



United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT
Alaska Outer Continental Shelf Region
3801 Centerpoint Drive, Suite 500
Anchorage, Alaska 99503-5823

JUL 18 2013

Memorandum

To: David Johnston, Regional Supervisor, Leasing and Plans

Through: Lisa Toussaint, Regional Supervisor, Environment

From: Mark Schroeder, Acting Chief, Environmental Analysis Section I

Subject: Categorical Exclusion Review of Ancillary Activities Notice, BP Exploration (Alaska) Inc., 2013 Geophysical Investigation

A Categorical Exclusion Review (CER) was used to evaluate the activities described in the ancillary activity notice, and we have determined the activities: (1) are eligible for categorical exclusion under 516 DM 15.4C; (2) do not implicate any extraordinary circumstances; and (3) therefore, will not have a significant effect on the human environment.

Description of BPXA's Proposed Ancillary Activities

Within a 14 day period beginning approximately July 20, 2013, BPXA proposes to conduct ancillary activities on a portion (approximately 2.0 mi²) of two BPXA OCS lease blocks (Lease Block Y1650 and Y1585) in the Beaufort Sea. The work would include three types of activities: (1) sub-bottom profiling; (2) side-scan sonar; and (3) single beam and multibeam bathymetry. This work will not involve an airgun or disturb the seabottom. Survey operations will be undertaken by two independent crews (approximately 10 total workers) on two survey vessels (the *R/V Annika Marie* and the *R/V Ukpik*).

BPXA's proposed ancillary activities include sub-bottom profiling, side-scan sonar, and single beam and multibeam bathymetry to support the following objectives:

Identification of possible future pad island locations

Evaluation of possible pipeline routes

Information about BPXA's proposed ancillary activities in the Beaufort Sea OCS was obtained from their 2013 Geophysical Investigation Project Description (dated June 6, 2013); Letter of Authorization for the incidental take of polar bears and Pacific walrus (dated July 3, 2013); BP Polar Bear and Walrus Interaction Plan for BPXA Areas of Operation; Mitigation Measures to Avoid Take of Marine Mammals during 2013 Liberty Summer Field Activities (received July 3, 2013); and emails received by BOEM from BPXA that provide further details on the specific activities to be conducted.

BPXA's ancillary activities are subject to Sale 144 lease stipulations 1 through 5, inclusive. Additionally, BPXA's proposed environmental protection includes specific conditions outlined in the FWS Letter of Authorization (dated July 3, 2013); mitigation measures as outlined in BPXA's "Mitigation Measures to Avoid Take of Marine Mammals during 2013 Liberty Summer Field Activities," and the relevant terms and conditions of the FWS BO (May 8, 2012).

Requirements for a Categorical Exclusion

A categorical exclusion is, by definition, “a category of actions which do not individually or cumulatively have a significant effect on the human environment...” (40 CFR 1508.4). DOI regulations (43 CFR 46.205) establishing categorical exclusions for BOEM activities are at 43 CFR 46.215 and 516 Departmental Manual (DM) 6, Chapter 15. The categorical exclusion listed in 516 DM 15 applies to the BP Exploration (Alaska) Inc. (BPXA) proposed 2013 ancillary activities (formerly known as preliminary activities) on the Beaufort Sea Outer Continental Shelf (OCS):

516 DM 15.4C. Permit and Regulatory Functions

(13) Preliminary activities conducted on a lease prior to approval of an exploration or development/production plan or a Development Operations Coordination Plan. These are activities such as geological, geophysical, and other surveys necessary to develop a comprehensive exploration plan, development/production plan, or Development Operations Coordination Plan.

Extraordinary Circumstance Review and Determination

Office of Environment subject matter experts reviewed BPXA’s ancillary activities notification and other relevant materials and considered whether any extraordinary circumstances—as established in 43 CFR 46.215—are implicated by the proposed activities. This review (available here as Attachment 1) concluded that no such extraordinary circumstances exist; therefore, these activities will not have a significant effect on the human environment.

Attachment

MMS ALASKA OCS - EXTRAORDINARY CIRCUMSTANCES REVIEW FOR CATEGORICAL EXCLUSION

PROJECT IDENTIFICATION

Operator/Project Name: BP Exploration (Alaska) Inc. / 2013 Geophysical Investigation

Date Project Submitted: June 6, 2013

Project Type: Ancillary Activities

Other Identifying Aspects:

Project Location: Beaufort Sea, On-lease: Side-scan sonar, sub-bottom profiling, multi/single beam bathymetry to support future pad island locations and pipeline routes.

The Department of the Interior's extraordinary circumstances for categorically excluded actions are found in 43 CFR 46.215

Extraordinary Circumstances (EC)	EC Present	Information Source							
		Federal/State Agency			Local & Private Correspondence	Prior NEPA	Other Studies & Reports	Staff Experts	Other (MMS Stips, staff memo)
		Correspondence (date)	Phone Check	Meeting (date)					
(a) Public Health and Safety	No					Beaufort Sea Planning Area Oil and Gas Lease Sale 144 EIS		Youngblood	
(b) Significant Impacts	No					Same as (a)		Holiday Youngblood Crews Schroeder Raps	
(c) Controversial Environmental Effects	No					Same as (a)		Holiday Youngblood Crews Schroeder Raps	
(d) Uncertain and Unknown Risks	No					Same as (a)		Holiday Youngblood Crews Schroeder Raps	
(e) Establishes Precedent	No					Same as (a)		Holiday Youngblood Crews Schroeder Raps	
(f) Cumulatively Significant	No					Same as (a)		Holiday Youngblood Crews Schroeder Raps	
(g) National Registry Historic Places	No					Same as (a)		Youngblood	

(h) Endangered/Threatened Species/Critical Habitats	No	BOEM determined that the noticed activities are covered by the existing FWS and the NMFS BOs for its Arctic Program.				Same as (a)		Schroeder Augustine Crews	Appropriate conditions are appended to Memos to File dated July 17, 2013 and July 18, 2013
(i) Violates Federal, State, Local Tribal Law or Requirement	No	LOA from FWS to BP dated 7/3/2013. NHPA consult not required.				Same as (a) and consultations listed in (h)		Schroeder Campbell	
(j) Environmental Justice	No					Same as (a)		Youngblood	
(k) Sacred Sites	No					Same as (a)		Campbell Youngblood	
(l) Invasive Species	No					Same as (a)		Holiday	

I have reviewed the proposal with respect to the criteria listed for extraordinary circumstances (43 CFR 46.215). This proposal would not meet any of these criteria and, therefore, does not represent an exception to the categorical exclusions.

Prepared By

Signature		Date	7/18/2013
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Concurrence

Signature Supervisor		Date	7-18-2013
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