

United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT. REGULATION AND ENFORCEMENT

7300

Pacific OCS Region 770 Paseo Camarillo, 2nd Floor Camarillo, California 93010-6064

Memorandum

To:

Regional Supervisor, Office of Field Operations

From:

Regional Supervisor, Office of Leasing and Environment

Subject:

Finding of No Significant Impact (FONSI), Dos Cuadras Offshore Resources, LLC (DCOR) Proposal – Platforms A, B and Hillhouse Riser Repair Project, Leases OCS-P 0241 and OCS-P 0240, Dos Cuadras Field, Offshore Santa Barbara

County

The Office of Leasing and Environment (OLE) has reviewed DCOR's proposal to perform topsides modifications and replace risers on Platforms A, B and Hillhouse offshore Santa Barbara County (Leases OCS-P 0241 and OCS-P 0240). This proposal was submitted to the Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE) in June 2010. The OLE has developed an Environmental Assessment (EA) which examined the potential impacts from the proposal on the human, coastal and marine environments.

Based on the attached EA, we have determined that the topsides modifications and riser replacements, as described, will not result in significant environmental impacts provided DCOR fulfills the environmental commitments stated in their proposal and complies with all required mitigations and conditions of approval.

The Proposed Action. DCOR is proposing to perform modifications to, and install several risers and clamps on, Platforms A, B and Hillhouse in the Dos Cuadras Field. These activities are in preparation for the proposed future installation of several pipeline segments to repair existing pipeline anomalies and improve pipeline integrity. DCOR proposes to make modifications to existing Platforms A, B and Hillhouse, by removing approximately six linear feet of marine growth from 32 underwater clamp locations, adding 40 additional clamps and 8 additional risers to these platforms. Four moorings are proposed during riser installation activities: three temporary moorings set near each platform, and the use of the existing mooring at Platform Hillhouse. The platform modification and riser replacement activities will be conducted concurrently and take approximately 22 days to complete late in the third quarter or beginning of the fourth quarter of 2011.

Summary of Impact Analyses and Conclusions. The BOEMRE has determined that the following environmental resources could be potentially affected by the proposed project: air quality, water quality, benthic resources, fishes, commercial and recreational fishing, marine and coastal birds and marine mammals. The EA assessed the project's potential effects on these resources and performed a cumulative analysis of the expected impacts from the proposed project when added incrementally to past, present, and reasonably foreseeable projects. The BOEMRE concluded that potential environmental impacts from the proposed Project will be

Environmental Assessment

Platforms A, B and Hillhouse Riser Repair Project

Dos Cuadras Offshore Resources, LLC.



Bureau of Ocean Energy Management, Regulation and Enforcement Pacific OCS Region

September 2011

Environmental Assessment (Final) September 8, 2011

Proposed Action: Bureau of Ocean Energy Management, Regulation and Enforcement's Concurrence with the Dos Cuadras Offshore Resources, LLC Proposal to Perform Modifications and Install Risers on Platforms A, B and Hillhouse.

Operator: Dos Cuadras Offshore Resources, LLC. (hereafter DCOR)

Area: Leases OCS-P 0240 and OCS-P 0241, Dos Cuadras Field, offshore Santa Barbara County, California

Responsible Agency: Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE)

Pacific OCS Region

Office of Leasing and Environment

Abstract: The BOEMRE proposed action is to evaluate and concur with DCOR's proposal to make platform modifications and replace risers on Platforms A, B and Hillhouse in the Dos Cuadras Field in preparation for replacing portions of the existing DCOR pipelines, to repair existing pipeline anomalies and to improve pipeline integrity. DCOR proposes to make modifications to Platforms A, B and Hillhouse by removing approximately six linear feet of marine growth at each of 32 underwater clamp locations, and adding 40 additional clamps and 8 additional risers to these platforms. The platform modification and riser replacement activities will be conducted concurrently and take approximately 22 days to complete late in the third or beginning of the fourth quarter of 2011. Environmental resources examined in this Environmental Assessment (EA) are: Archaeological Resources, Benthic Resources, Air Quality, Water Quality, Fishes, Commercial and Recreational Fishing, Marine Mammals and Sea Turtles, Marine and Coastal Birds and Environmental Justice. The primary potential impacting agents are: air emissions, sedimentation, lighting, noise and space-use conflicts. No permanent or longterm effects of the proposed action were identified in this assessment. As such, the proposed action, when added to other activities is not expected to result in any measurable cumulative effects.

The EA is available via the following ways:

On the Web: http://www.boemre.gov/omm/pacific

By Mail:

Bureau of Ocean Energy Management, Regulation and Enforcement, Pacific OCS Region Attn: Platforms A, B and Hillhouse Riser Repair Project EA (2011) c/o Ms. Janice Hall, Public Information Officer 770 Paseo Camarillo, 2nd floor Camarillo, CA 93010-6064

By Phone: 800.672.2627

For further information contact: Mark Eckenrode, EA Coordinator, Office of Leasing and Environment, 770 Paseo Camarillo, 2nd floor, Camarillo, CA 93010-6064; Phone: 805.389.7827; e-mail: mark.eckenrode@boemre.gov.

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Introduction

The Dos Cuadras field includes Platforms A, B, C¹ and Hillhouse, which are located approximately 10 kilometers (km) (6.2 miles) offshore of Santa Barbara, California. These platforms and a series of connecting pipelines and power cables are operated by Dos Cuadras Offshore Resources, LLC (DCOR). Platforms A and B were installed in 1968 on Lease OCS-P 0241. Platform Hillhouse was installed in 1969 on Lease OCS-P 0240. The platforms are in water depths from approximately 49 to 64 meters (160 to 210 ft.).

DCOR has identified anomalies in several of the pipelines associated with the Dos Cuadras infrastructure that could potentially affect the integrity of these pipelines. In preparation for replacing portions of existing DCOR pipelines with new segments (based on the availability of a dynamically positioned (DP) pipe-laying vessel on the west coast), DCOR has submitted a plan to make modifications and to install risers on Platforms A, B and Hillhouse. This plan was submitted to the Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE) in June 2011.

Purpose and Need

DCOR is proposing to make modifications to, and install several risers and clamps on, Platforms A, B and Hillhouse in the Dos Cuadras Field. These activities are in preparation for the proposed future installation of several pipeline segments, to repair existing pipeline anomalies and to improve pipeline integrity. Approval of this proposed action does not assume approval of the pipeline replacement project which will be assessed at a later date as a separate project.

The purpose of the BOEMRE is to balance orderly and optimal energy resource development with protection of the human, marine and coastal environment consistent with the requirements of the 1978 Outer Continental Shelf Lands Act (OCSLA), as amended. The OCSLA directs the Secretary of the Department of the Interior to establish policies and procedures that expedite exploration and development of the OCS in order to achieve national energy goals, assure national security, reduce dependence on foreign sources and maintain a favorable balance of payments in world trade. The Secretary's responsibilities under OCSLA have been delegated to the BOEMRE. This project will allow DCOR to continue to produce oil and gas in an environmentally sound manner which will help to reduce dependence on foreign energy sources, which has led to an unfavorable balance of payments and a less secure national economy. A secondary benefit is the collection of royalties, bonuses, and rents. These monetary benefits represent a significant source of revenue for the Federal government.

Proposed Action and Other Alternatives Considered

Proposed Action

DCOR proposes to make modifications to existing Platforms A, B and Hillhouse, by removing approximately six linear feet of marine growth from 32 underwater clamp locations, and adding 40 additional clamps and 8 additional risers to these platforms. Each riser will be installed in three sections and supported by four underwater support clamps and one topside support clamp. Four moorings are proposed during riser installation activities: three temporary moorings set near each platform, and the use of the existing mooring at Platform Hillhouse. The moorings will be utilized by the M/V *Danny C*, which is 77 feet long. One of the two DCOR crew boats, *Alan T* or *Ryan T*, will also be utilized as a logistics support vessel to the M/V *Danny C*. Divers will be

¹ Platform C was installed in 1969; however no activities are proposed for Platform C at this time.

deployed from the M/V *Danny C* to remove approximately 6 linear feet of growth from each location (3 feet on either side of the center-point) using a water jet. Divers will also inspect and remove appurtenances. The upper riser section will be installed first and the +15 foot elevation clamp will be welded on prior to the installation of the lower two sections. Construction during riser installation will occur 24 hours per day until completed. The platform modification and riser installation activities will be conducted concurrently and take approximately 22 days to complete late in the third or beginning of the fourth quarter of 2011. The M/V *Danny C* will mobilize out of and come to Santa Barbara Harbor approximately three times during the construction period.

Other Alternatives Considered

No-Action – If no action is taken, DCOR will not be able to pursue a separate undertaking to replace existing pipeline segments that will ensure pipeline integrity and the safe flow of fluids from the DCOR facilities.

No other alternatives were considered in this analysis.

Affected Environment

Impacting Factors

The proposed action may affect the environment in several ways:

- Temporary installation of moorings will result in localized disturbance of the benthic environment which may affect biological resources;
- Air emissions from vessels may temporarily increase;
- Water quality may be temporarily affected by bottom disturbance resulting from the installation and removal of the temporary moorings and from platform cleaning activities;
- Commercial fishing activities may be temporarily excluded within the immediate vicinity of the temporary moorings; and,
- Marine mammals, birds, and fish may be affected by the increase in activities in the area, the increase in lighting and disturbance of seafloor sediments, respectively.

An assessment of each of these areas of the affected environment is provided below.

Archaeological Resources: A sonar survey was completed in May 2011, which confirmed that no cultural or archaeological resources are present in the areas that may be affected by the riser and clamp installation activities. Given the absence of cultural and archaeological resources in the project area, we conclude that the proposed action will not have significant impacts to these resources.

Mitigation Measures: No mitigation measures for archaeological resources were proposed by either DCOR or BOEMRE.

Benthic Environment: The sonar surveys conducted in May 2011, also confirmed that the seafloor in the project area is dominated by soft (unconsolidated) sediments and associated fauna. Soft sediments are the most common habitat type on the continental shelf in the Santa Barbara Channel and organisms are dispersed throughout. DCOR's anchor mitigation strategy, project design, post-construction surveys and the mitigation measures proposed by DCOR and BOEMRE will further ensure that seafloor disturbance is minimized. Reporting of the GPS locations of the temporary moorings at deployment and upon retrieval will confirm that anchors were not displaced during

proposed activities. Given the absence of unique or unusual biological resources and the measures taken to reduce impacts to the seafloor, we conclude that the proposed action, including the associated mitigation measures, will not have significant impacts on the benthic environment.

Mitigation measures:

Mitigation Measures Proposed by DCOR

- Develop and implement an anchor mitigation plan.
- A Notice to Mariners will be submitted to the 11th Coast Guard District approximately 10 to 14 days prior to the start of the project for the temporary mooring. The project Mooring Operations Plan will also be submitted to the Private Aids to Navigation, Commander, 11th Coast Guard District.
- Conduct a final ROV survey to verify that no rigging or equipment used during the installation is left on the seafloor.

Mitigation Measures Proposed by BOEMRE

• DCOR must report to BOEMRE the GPS locations of anchors at the time moorings are placed and again when the moorings are removed.

Air Emissions: DCOR will designate the M/V Danny C as the approved project supply boat operating under the DCOR Dos Cuadras Field Santa Barbara County Air Pollution Control District (SBCAPCD) stationary source permits for Platforms A, B, C, Hillhouse and Henry. The DCOR crew boats Alan T or Ryan T may also be utilized as support vessels for the Danny C. All other internal combustion engines utilized to install the risers are included under DCOR's existing air permits. Equipment and personnel will be transported through existing vessel traffic corridors. Fuel consumption for the supply boats as well as equipment on the platform and work barge will be measured and recorded daily, as required under existing SBCAPCD permits, rules and regulations. Air emissions will be minimal due to the small amount of equipment required and the short duration of installation activities, and will be in full compliance with SBCAPCD rules and regulations. We therefore conclude that the proposed action will not have significant impacts to these resources.

Mitigation measures: No mitigation measures for air quality were proposed by either DCOR or BOEMRE.

Water Quality: Removal of six linear feet of marine growth from 32 underwater clamp locations will create short-term turbidity in the water column. In addition, the placing and retrieving of the temporary moorings will briefly disturb sediments creating sediment clouds which are expected to settle out of the water column quickly with minimal changes to water quality. We therefore conclude that water quality will not be significantly affected because of the short term and transient nature of these effects.

Mitigation measures: No mitigation measures for water quality were proposed by either DCOR or BOEMRE.

Fish Resources: Proposed project activities may disturb seafloor sediments, add additional organic matter to the shell mound habitat beneath the platforms, and increase turbidity levels within the water column. These effects would be localized and occur within a short time frame and we therefore conclude that the proposed action will not have significant impacts to these resources.

Mitigation measures: No mitigation measures for fish resources were proposed by either DCOR or BOEMRE.

Commercial and Recreational Fishing: Because large marine vessels are prohibited from entering the exclusion zone around offshore platforms and commercial fishing activity from smaller vessels rarely occurs because of the multiple known obstructions in the project area, we therefore conclude that commercial fishing will not be significantly impacted by this project. The mitigation measure proposed by DCOR will further minimize effects to commercial fishing. Recreational fishing vessels could still fish in the project area during proposed activities and therefore would not be affected.

Mitigation measures

Mitigation Measures Proposed by DCOR

• Notify the Joint Oil-Fisheries Liaison Office (JOFLO) and contact the Coast Guard for publication of a Notice to Mariners.

Marine Mammals and Sea Turtles: Several species of marine mammals may occur within the vicinity of Platforms A, B and Hillhouse including sea lions, seals, dolphins and whales. The riser installation activities are proposed to be conducted at the platforms from a moored vessel, the Danny C. Neither the mooring of this vessel nor other vessel operations are expected to result in a strike risk to marine mammals. Underwater sound production is expected to be minimal. Divers may attract the attention of curious sea lions with no risk to this species. The mitigation measures proposed by DCOR and BOEMRE will further reduce the likelihood of impacts to marine mammals or sea turtles from the proposed activities. We therefore conclude that the proposed action will not have significant impacts to these resources.

Mitigation measures

Mitigation Measures Proposed by DCOR

All vessel operators shall observe the following guidelines:

- Make every effort to maintain a distance of 300 feet from whales and other marine wildlife (e.g., sea turtles) (per NOAA requirements).
- Do not cross directly in front of (perpendicular to) migrating whales or any other marine mammal or turtle.
- When paralleling whales, vessels will operate at a constant speed that is not faster than that of the whales.
- Care will be taken to ensure that female whales are not separated from their calves.
- If a whale engages in evasive or defensive action, vessels will reduce speed or stop until the animal calms or moves out of the area.

Mitigation Measures Proposed by BOEMRE

• Provide marine mammal awareness training to all personnel participating in the installation project, including viewing of the BOEMRE-approved Wildlife and Fisheries Training video (2009).

Marine and Coastal Birds: Birds found within the vicinity of Platforms A, B and Hillhouse may be affected by lighting of the work vessel during night time operations becoming disoriented by the additional lighting in the area. Mitigation measures proposed by DCOR and BOEMRE to

minimize the potential effects of project-related artificial lighting during night operations to birds will minimize or avoid those effects. Noise from construction operations is not expected to affect marine birds. Endangered or threatened birds are not expected to occur in the project area during the third and fourth quarter of the year when project activities are expected to occur, so it is unlikely that any would be affected by the proposed activities. We therefore conclude that the proposed action will not have significant impacts to these resources.

Mitigation measures

Mitigation Measures Proposed by DCOR

- Whenever possible, lighting will be directed inboard and downward to reduce the potential for seabirds to be attracted to the work area.
- Where possible, cabin windows will be equipped with shades, blinds or shields that block exiting light.
- The onboard monitor will routinely inspect lighted vessels for birds that may have been attracted to the lighted vessels.
- A log of all seabirds found onboard vessels will be maintained with the status and health of birds on retrieval and release. The log will be provided to the BOEMRE when the project has been completed.
- If an injured bird is discovered on a vessel, the bird will be transported on the next returning work vessel to an approved wildlife care facility.

Mitigation Measures Proposed by BOEMRE:

• DCOR shall immediately report to BOEMRE any birds that are found injured or dead during installation operations.

Environmental Justice: Impacts on minority and low-income populations were considered in accordance with Executive Order 12898. The onshore areas that will be affected by the proposed project are Port Hueneme and the Santa Barbara Harbor. Using Council on Environmental Quality guidance and U.S. Census Bureau data, a significant Hispanic/Latino minority population (greater than 50%) was identified in the city of Port Hueneme. However, the proposed action will not result in any adverse effects at Port Hueneme or the Santa Barbara Harbor; therefore there will be no disproportionately high adverse human health or environmental effects to this minority population.

Mitigation measures: No mitigation measures were proposed by either DCOR or BOEMRE.

Cumulative Effects

No permanent or long-term effects of the proposed action were identified in this assessment. As such, the proposed action, when added to other activities, is not expected to result in any measurable cumulative effects.

Consultation and Coordination

The BOEMRE considered information from recent consultations and larger projects in this area. Given the lack of any significant impacts the proposed project will have on marine mammals, fishes and their habitat, BOEMRE did not conduct either an essential fish habitat consultation or a section 7 consultation endangered species with NMFS regarding the proposed project activities. BOEMRE did not conduct a section 7 endangered species consultation with the U.S.

Fish and Wildlife Service. BOEMRE discussed the project with the SBCAPCD and confirmed the project emissions will be included under DCOR's existing air permits and the project will be in full compliance with SBCAPCD rules and regulations. The United States Coast Guard will require a Mooring Operations Plan to be submitted prior to temporary mooring installation.

insignificant based on significance criteria used in the analyses and the negligible incremental increase of the proposed action to cumulative impacts.

Determination of Significance - Resources Examined and Mitigation Measures

Archaeological Resources: A sonar survey was completed in May 2011, which confirmed that no cultural or archaeological resources are present in the areas that may be affected by the riser and clamp installation activities. Given the absence of cultural and archaeological resources in the Project area, we conclude that the proposed action will not have significant impacts to these resources.

Mitigation measures: No mitigation measures for archaeological resources were proposed by either DCOR or BOEMRE.

Benthic Environment: The sonar surveys conducted in May 2011 also confirmed that the seafloor in the Project area is dominated by soft (unconsolidated) sediments and associated fauna. Soft sediments are the most common habitat type on the continental shelf in the Santa Barbara Channel and organisms are dispersed throughout. DCOR's anchor mitigation strategy, project design, and post-construction surveys will ensure that seafloor disturbance is minimized. Given the absence of unique/unusual biological resources and the measures taken to reduce impacts to the seafloor, we conclude that the proposed action will not have significant impacts on the benthic environment.

Mitigation measures:

Mitigation Measures Proposed by DCOR

- Develop and implement an anchor mitigation plan.
- ♦ A Notice to Mariners will be submitted to the 11th Coast Guard District approximately 10 to 14 days prior to the start of the project for the temporary mooring. The Project Mooring Operations Plan will also be submitted to the Private Aids to Navigation, Commander, 11th Coast Guard District.
- ♦ Conduct a final ROV survey to verify that no rigging or equipment used during the installation is left on the seafloor.

Mitigation Measures Proposed by BOEMRE

• DCOR must report to BOEMRE the GPS locations of anchors at the time moorings are placed and again when the moorings are removed.

Air Emissions: DCOR will designate the M/V Danny C as the approved project supply boat operating under the Santa Barbara County Air Pollution Control District (SBCAPCD) stationary source permits for DCOR Dos Cuadras Field Platforms A, B, C, Hillhouse and Henry. Equipment and emissions from the topsides modifications and riser installation activities have been reviewed and analyzed by the SBCAPCD and will be in full compliance with SBCAPCD rules and regulations and existing DCOR air quality permits. Equipment and personnel will be transported through existing vessel traffic corridors. Fuel consumption for the supply boats as well as equipment on the platform and work barge will be measured and recorded daily, as required under existing SBCAPCD permits, rules and regulations. Air emission impacts will be negligible due to the small amount of equipment required and the short duration of installation activities. We therefore conclude that the proposed action will not have significant impacts to these resources.

Mitigation measures: No mitigation measures for air quality were proposed by either DCOR or BOEMRE.

Water Quality: Removal of six linear feet of marine growth from 32 underwater clamp locations will create short-term turbidity in the water column. In addition, the placing and retrieving of moorings will temporarily disturb sediments creating sediment clouds which are expected to settle out of the water column with minimal changes to water quality. We therefore conclude that water quality will not be significantly impacted because of the short term and transient nature of these effects.

Mitigation measures: No mitigation measures for water quality were proposed by either DCOR or BOEMRE.

Fishes: Proposed project activities may disturb seafloor sediments, add additional organic matter to the shell mound habitat beneath the platforms and increase turbidity levels within the water column. These effects would be localized and occur within a short timeframe; we therefore conclude that the proposed action will not have significant impacts to these resources.

Mitigation measures: No mitigation measures for fish resources were proposed by either DCOR or BOEMRE.

Commercial and Recreational Fishing: Because large marine vessels are prohibited from entering the exclusion zone around offshore platforms and commercial fishing activity from smaller vessels rarely occurs because of the multiple known obstructions in the project area, we therefore conclude that commercial fishing will not be significantly impacted by this project. Recreational fishing vessels could still fish in the project area during proposed activities and therefore would not be affected.

Mitigation measures:

Mitigation Measures Proposed by DCOR

• Notify the Joint Oil-Fisheries Liaison Office (JOFLO) and contact the Coast Guard for publication of a Notice to Mariners.

Marine Mammals and Sea Turtles: The riser installation activities are proposed to be conducted at the platforms from a moored vessel, and other vessel operations are not expected to result in a strike risk to marine mammals or effects to sea turtles. The mitigation measures proposed by DCOR will help to further reduce the likelihood of impacts to result in no adverse effects to marine mammals from the proposed activities. We therefore conclude that the proposed action will not have significant impacts to these resources.

Mitigation measures:

Mitigation Measures Proposed by DCOR

All vessel operators shall observe the following guidelines:

- Make every effort to maintain a distance of 300 feet from whales and other marine wildlife (e.g., sea turtles) (per NOAA requirements).
- Do not cross directly in front of (perpendicular to) migrating whales or any other marine mammal or turtle.
- When paralleling whales, vessels will operate at a constant speed that is not faster than that of the whales.

- Care will be taken to ensure that female whales are not separated from their calves.
- If a whale engages in evasive or defensive action, vessels will reduce speed or stop until the animal calms or moves out of the area.

Mitigation Measures Proposed by BOEMRE

 Provide marine mammal awareness training to all personnel participating in the installation project, including viewing of the BOEMRE-approved Wildlife and Fisheries Training video (2009).

Marine and Coastal Birds: Birds found within the vicinity of Platforms A, B and Hillhouse may be affected by lighting of the work vessel during night time operations or by noise from the construction operations. Endangered or threatened birds are not expected to occur in the project area during the third and fourth quarter of the year when project activities are expected to occur, so it is unlikely that any listed birds would be affected by the proposed activities. We therefore conclude that the proposed action will not have significant impacts to these resources.

Mitigation measures:

Mitigation Measures Proposed by DCOR

- Whenever possible, lighting will be directed inboard and downward to reduce the potential for seabirds to be attracted to the work area.
- Where possible, cabin windows will be equipped with shades, blinds or shields that block exiting light.
- The onboard monitor will routinely inspect lighted vessels for birds that may have been attracted to the lighted vessels.
- A log of all seabirds found onboard vessels will be maintained with the status and health of birds on retrieval and release. The log will be provided to the BOEMRE when the Project has been completed.
- If an injured bird is discovered on a vessel, the bird will be transported on the next returning work vessel to an approved wildlife care facility.

Mitigation Measures Proposed by BOEMRE

• DCOR shall immediately report to BOEMRE any birds that are found injured or dead during installation operations.

Environmental Justice: Impacts on minority and low-income populations were considered in accordance with Executive Order 12898. The proposed action will not result in any adverse effects at Port Hueneme or Santa Barbara Harbor and there will be no disproportionately high adverse human health or environmental effects to this minority population.

Mitigation measures: No mitigation measures were proposed by either DCOR or BOEMRE.

Finding Statement

Based on the evaluation of DCOR's proposal and the potential impacts discussed in the attached EA, the BOEMRE has determined that concurrence with DCOR's Riser Repair Project (the Proposed Action) will not significantly affect the quality of the human environment pursuant to the National Environmental Policy Act §102 (2)(C) and therefore no Environmental Impact Statement is required.

Lynnette L. Vesco

Regional Supervisor, Office of Leasing and Environment

Pacific OCS Region

Bureau of Ocean Energy Management, Regulation and Enforcement

Attachment

bcc: Subject File: 1703-02a(1) - Field Development (Dos Cuadras) (vault)

102-01b Chron

ecc: Subject File: 1102-01b - Field Development (Dos Cuadras) (OLE)

OEMM Pac Managers, without attachment

Chief, EAS w/attach/ Chief, OSES w/attach M. Eckenrode w/attach

T. Bell w/attach.L. Gilbane w/attach

OLE:DP:pfr\p:1102-01b - Field Development - Dos Cuadras Field (Platforms A, B, C, Hillhouse) \Platform A Riser Repair CER_2009-06-30.doc