



United States Department of the Interior
BUREAU OF OCEAN ENERGY MANAGEMENT
Alaska OCS Region
3801 Centerpoint Drive, Suite 500
Anchorage, Alaska 99503-5823

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FEB 6 2014

Regional Director, Alaska OCS
Bureau of Ocean Energy Management
Anchorage, Alaska

Memorandum

FEB 6 2014

To: Regional Supervisor, Leasing and Plans

Through: Regional Supervisor, Environment *[Signature]*

From: Chief, Environmental Analysis Section *[Signature]*

Subject: Categorical Exclusion Review of Ancillary Activities Notice, BP Exploration (Alaska) Inc. (BPXA), 2014 Winter Geotechnical and Seabottom 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

BPXA's noticed ancillary activities include drilling up to twenty 8-10 inch boreholes, deploying a remote operated vehicle (ROV), and conducting Cone Penetration Tests (CPT) in the Outer Continental Shelf (OCS), with the following objectives:

- Provide soils information for the possible future pad locations
- Provide soils information for evaluating proposed pipeline routing
- Provide a visual inspection of the sea bottom environment

Information about BPXA's noticed ancillary activities in the Beaufort Sea OCS was obtained from their 2014 Winter Geotechnical & Seabottom Investigation Project Description / Plan of Operations (dated December 18, 2013); Request for Letter of Authorization for the Incidental Take of Polar Bears and Pacific Walrus, and Request to Take Polar Bears by Harassment (Deterrent Activities) while conducting activities in Foggy Island Bay, Alaska; and BPXA Spill Emergency Response Plan (dated March 11, 2013).

Within the period beginning March 2014 and continuing through early May 2014, BPXA advised it intends to conduct ancillary activities within the Liberty Unit and portions of the Duck Island Unit, as well as non-unit areas. The work would include two types of activities: (1) collecting soils information by drilling up to twenty 8-10 inch geotechnical boreholes from sea ice to depths of 100 feet below the seabottom; (2) possible seabottom inspection using a remotely operated vehicle (ROV); and 3) CPT. The CPT's entail advancing the cone from the

mudline to approximately 50 feet to record tip resistance, sleeve friction, dynamic pore pressure, temperature and cone inclination, all of which further characterize soil properties.

To collect soils information, a drill specifically configured for shallow soils exploration will be used for the project. The drill will be mounted in an enclosed trailer so that the drill and work area are protected from the weather by an enclosure. A roller-driven Rolligon would be used to pull the enclosed drill trailer. A generator and all support tools will be carried on the trailer or the accompanying Rolligon. A second Rolligon will provide support including fuel tanks for fuel resupply, and a Tucker vehicle will be used for personnel support and environmental observations. Using the same access routes and work areas, an ROV will be lowered through ice holes and will search the seafloor to define its local characteristics.

BPXA's proposed environmental protection includes the use of Protected Species Observers (PSOs) to establish a travel route to avoid seal lairs, measures provided by their Polar Bear and Walrus Interaction Plan for BPXA Areas of Operation (pending approval of an LOA by the USFWS), and a Spill Emergency Response Plan for refueling of Tuckers and Rolligons.

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 (46 CFR 205) establishing categorical exclusions for BOEM activities are at 46 CFR 215 and 516 Departmental Manual (DM) 6, Chapter 15. The categorical exclusion listed in 516 DM 15 applies to the BPXA's noticed 2013 ancillary activities (formerly known as preliminary activities) on the Beaufort Sea Outer Continental Shelf (OCS):

The categorical exclusion applies to:

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.

In order to conduct the noticed activities, BPXA must:

1. Provide BOEM with confirmation from Environmental Protection Agency that the activities would not result in an unauthorized discharge under Section 402 of the Clean Water Act.
2. Provide to BOEM and the Alaska SHPO an archaeological report, completed by a DOI qualified marine archaeologist, providing analysis of the geotechnical boreholes.
3. Consider conservation recommendations, if any, from NMFS through the EFH consultation process, which is currently ongoing.
4. Obtain all necessary permits from the State of Alaska with regard to water discharges/withdrawals, if required.

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 Deschu	
(c) Controversial Environmental Effects	No					Same as (a)		Holiday Youngblood Crews Schroeder Raps Deschu	
(d) Uncertain and Unknown Risks	No					Same as (a)		Holiday Youngblood Crews Schroeder Raps Deschu	
(e) Establishes Precedent	No					Same as (a)		Holiday Youngblood Crews Schroeder Raps	
(f) Cumulatively Significant	No					Same as (a)		Holiday Youngblood Crews Schroeder Raps Deschu	

(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 <i>M. H. Hutter</i>	Date 2/7/14
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Concurrence

Signature Supervisor <i>Li Lit</i>	Date 2/7/14
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