



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Marine Region  
4665 Lampson Ave, Suite C  
Los Alamitos, CA 90720  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

ED. ED G. BROWN JR., Governor  
CHARLTON H. BONHAM, Director



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JAN 28 2013

BUREAU OF OCEAN ENERGY MANAGEMENT

January 24, 2013

Ms. Joan Barminski  
Regional Supervisor -Bureau of Ocean Resources Management  
Pacific OCS Region  
770 Paseo Camarillo, CM 215  
Camarillo, CA 93010-6064

**Subject: Plains Exploration and Production Company Platform Hidalgo  
Development and Production Plan**

Dear Ms. Barminski:

The California Department of Fish and Wildlife (Department) has received the November 16, 2012 letter addressed to Secretary Laird of the California Natural Resources Agency regarding the proposed development of the platform Hidalgo, located within the Point Arguello Unit (Project), by Plains Exploration and Production Company (PXP). This proposed Project involves a revision to the Development and Production Plan (DPP) to allow for the development of the Western Half of the NW/4 federal oil lease (number OCS-P 0450). Department staff has been in contact with Ms. Susan Zaleski with your Camarillo office, and has reviewed the information found on your website pertaining to the revisions. (See <http://boem.gov/Oil-and-Gas-Energy-Program/Leasing/Regional-Leasing/Pacific-Region/Arquello-DPP.aspx> ).

Based on our inquiries and review of information found on the above website, it appears the Project includes plans to utilize platform Hidalgo to drill two oil production wells into an oil-bearing formation located outside of the California three-mile territorial limit adjacent to the Vandenberg Air Force Base and the County of Santa Barbara. Drilling is expected to span a 6-12 month period. It is our understanding that your agency is in the beginning stages of doing the environmental assessments for the proposed Project. Department staff has reviewed the preliminary biological information provided by PXP and has the following comments and concerns.

- The Department requests the Bureau of Ocean Energy Management (BOEM) consult with the Department early in the planning process to determine the scope of any National Environmental Policy Act (NEPA) required environmental assessments or other environmental studies that will be conducted to assess the environmental impacts of the PXP proposal.
- The current PXP proposal may result in the extension or replacement of associated pipelines and offshore facilities, some of which are located on State lands and in State waters. If it is reasonably foreseeable that drilling into the new federal formation would lead to a need to replace any offshore or onshore components to

Ms. Joan Barminski

January 24, 2013

Page 2 of 2

platform Hidalgo, then an analysis of impacts should be included in the present studies before BOEM approves the proposed Project.

- As the State's trustee agency for wildlife resources, the Department appreciates the opportunity to provide input regarding any proposed mitigation measures for this Project, preferably, before any final measures have been chosen.
- The preliminary environmental information provided by PXP does not include an impact analysis of all state and federally listed species or other species of concern to the State of California. Department staff would be willing to assist BOEM in conducting impact analysis of all species of concern to the State of California. (See <http://www.dfg.ca.gov/wildlife/nongame/ssc/>).

We appreciate the opportunity to comment on this proposal prior to the completion of the required environmental studies. Should you have further questions regarding our comments and concerns, please contact Tom Napoli, Staff Environmental Scientist at 562-342-7164 or [Tom.Napoli@wildlife.ca.gov](mailto:Tom.Napoli@wildlife.ca.gov).

Sincerely,



Paul Hamdorf  
Acting Regional Manager  
Marine Region

ecc: Chris Potter, California Natural Resources Agency, [Chris.Potter@resources.ca.gov](mailto:Chris.Potter@resources.ca.gov)  
Alison Dettmer, California Coastal Commission, [ADettmer@coastal.ca.gov](mailto:ADettmer@coastal.ca.gov)  
Cy Oggins, California State Lands Commission, [Cy.Oggins@slc.ca.gov](mailto:Cy.Oggins@slc.ca.gov)  
Melissa Boggs, California Department of Fish and Wildlife-OSPR,  
[Melissa.Boggs@wildlife.ca.gov](mailto:Melissa.Boggs@wildlife.ca.gov)  
Becky Ota, California Department of Fish and Wildlife, [Becky.Ota@wildlife.ca.gov](mailto:Becky.Ota@wildlife.ca.gov)