



United States Department of the Interior

NATIONAL PARK SERVICE

Padre Island National Seashore

P. O. Box 181300

Corpus Christi, Texas 78480-1300



IN REPLY REFER TO:

L3025

October 10, 2007

Mr. Allan M. Strand
U.S. Fish and Wildlife Service-Ecological Services
C/o Texas A&M University - Corpus Christi
6300 Ocean Drive, Campus Box 338
Corpus Christi, TX 78412

Dear Mr. Strand:

BNP Petroleum Corporation (BNP) submitted to the National Park Service (NPS) a plan of operations to drill and produce three natural gas wells, known as ST 991 #1, Dunn-McCampbell 11A, and Dunn-McCampbell 12A, within Padre Island National Seashore (PAIS). The NPS has prepared an Environmental Assessment to analyze the effects of the proposed operations on park visitors and resources, and a Biological Assessment to analyze the projects effect on listed and proposed species within PAIS. The NPS submitted the Biological Assessment to your office earlier this year; however, upon further conversation with your office it appears that existing consultation could be amended to include the proposed operation and expedite the consultation process.

The project area for the proposed drilling operation includes Park Road 22 from the park entrance to the beach and along the Gulf of Mexico beachfront 6.9 miles. At that point, BNP would use the Pan Am Road through the dunes to access the existing Dunn-McCampbell A8 surface location, approximately 2,900 feet west of the Gulf beach.

In accordance with subsection 7(a)(2) of the Endangered Species Act and the implementing regulations found at 50 C.F.R. Part 402 (2002), we hereby request re-initiation of consultation for the Dunn-Peach #1 and Dunn-Manzano #1 wells (Consultation #2-11-04-F-0050), which was further amended for the Dunn-Peach #2-6 wells on December 22, 2004 and the Dunn-Peach #7 well on February 14, 2007.

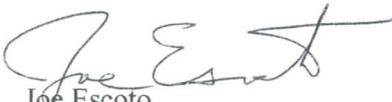
The NPS has concluded that the proposed operation to drill the ST 991 #1, Dunn-McCampbell 11A, and Dunn-McCampbell 12A wells may affect, but would not likely adversely affect protected species and request concurrence with our determination. This determination is based on several factors that are presently in place to reduce the impact to Threatened or Endangered Species. These factors include:

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- The original Dunn-Manzano #1 well location has been modified by moving the location westward to an existing wellpad. All other aspects of the Dunn-Manzano #1 well reviewed in the previous consultation remain the same.
- The new location requires an expansion of 0.83 acres instead of the original proposed disturbance of 2.0 acres and reduces the amount of vehicular traffic and time necessary to build a new pad, which reduces potential impacts to protected species.
- The proposed drilling operation would occur outside of the sea turtle nesting season and would not impact the five species of sea turtles that utilize the park.
- A drilling rig is currently near the proposed location, which would be moved approximately three miles from its present location. This will reduce the overall vehicle traffic along 6.9 miles of Gulf Beach and thereby reduce impacts to protected species.
- The drilling operation is expected to require 120 days to drill and complete three wells, which would occur during the winter months, and therefore minimize impacts to protected species.
- The existing 51 mitigation measures that have been employed for all oil and gas operations occurring within the park since 2000 would also be required for this operation. These mitigation measures have proven to be successful at reducing impacts to protected species.
- A take of an adult Kemp's ridley sea turtle has not occurred, which is allowed through the approved incidental take statement associated with BO #2-11-04-F-005 for the Dunn-Peach wells 1-7 and Dunn-Manzano #1 well.

By re-initiating consultation, the NPS seeks an amendment to address modifications to the originally proposed action for the addition of three wells, since impacts will be similar to those addressed in BO #2-11-04-F-005. If you need any additional information, please contact Mr. Darrell Echols, Chief of the Science and Resources Management Division, at (361) 949-8173, extension 223.

Sincerely,



Joe Escoto
Superintendent