



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 (PAIS)

September 30, 2002

Mark Pattillo
Regulatory Branch, CESWG-PE-RB
U.S. Army Corps of Engineers
5151 Flynn Parkway, Suite 306
Corpus Christi, Texas 78411-4318

Dear Mark Pattillo:

The National Park Service (NPS) has reviewed the Public Notice, dated August 27, 2002, for U. S. Army Corps of Engineers, Permit Application No. 22754. BNP Petroleum Corporation (BNP) has requested this permit to conduct activities associated with the exploration of oil and gas adjacent and within Padre Island National Seashore. BNP would directionally drill for and develop non-federally owned oil and gas resources underlying Padre Island National Seashore from a surface location west of the park boundary. Padre Island National Seashore is concerned with the potential environmental indirect effects of the proposal, while protection and prevention of impairment to park resources and values, and continued enjoyment of park recreational opportunities.

While the permit addresses the placement of an access channel and a beneficial use island, the permit does not include other connected actions such as the locations of pipelines, flowlines, and production facilities. Without including these connected actions as a probable scenario with this permit, the NPS feels that the environmental analysis will not provide a full analysis and understanding of the impacts associated with the project. It is possible that by addressing certain portions of this entire project one piece at a time, each relative piece could have minimal impacts, but as a whole the impacts could be much greater. The NPS respectfully requests that all connected actions associated with this project be addressed together in subsequent environmental analysis.

We are also concerned with other environmental impacts that could occur with this project. These include direct and indirect impacts on park resources such as threatened and endangered species, seagrasses, the visitor experience, and water quality.

The National Park Service takes exception to the Public Notice statement on page four that states, "no known threatened and/or endangered species or their critical habitat will be affected by the proposed work". We know of at least two species of sea turtles, the threatened green turtle (*Chelonia mydas*) and endangered Kemp's ridley (*Lepidochelys kempii*) inhabiting the Laguna Madre in the area of the proposed project. Both of these turtles utilize the Laguna Madre for foraging and resting, but the green turtle is the most common species. The Kemp's ridley is more rarely seen in the Laguna Madre.

Studies show that the juvenile green turtle forages on marine algae that is attached to rocky substrates and on seagrasses. It is therefore likely that these protected species could be impacted through activities associated with this project.

While the creation of an access channel involves dredging, different types of hydraulic dredges can be used with varying affects to sea turtles. The National Park Service would oppose the use of a hopper dredge to create this channel due to its high sea turtle injury rate. The ability of green turtles to forage could be impacted by the turbidity created through initial dredging process or periodic maintenance dredging. The availability of food could be affected by suspended sediments, which indirectly could affect sea turtles. Depending on the timing, the physical activity of dredging could affect sea turtles by causing them to unnecessarily expend additional energy during foraging or resting.

Other state or federally protected species that could be affected by this project include the Reddish Egret (*Egretta rufescens*), White-faced Ibis (*Plegadis chihi*), Interior Least Tern (*Sterna antillarum*), and Black Tern (*Chlidonias niger*). These species would be in directly impacted by this project, and but their ability to utilize the beneficial use island may be questionable.

There are several design issues related to the beneficial use island. Its current design includes a hardened concrete berm, which will help retain the dredge material. However, this berm will prevent ground nesting species such as the Interior Least Tern and Black Tern from viewing the water and thereby guarding themselves against predators. Additionally, if these species produce fledglings, the berm will preclude the fledglings from accessing the shoreline, which is necessary for their development.

Other concerns include the possibility of accelerated erosion due to hydrologic changes with a concrete hardened berm and the placement of a dredge material island where one does not currently exist. The placement of an island in shallow water fairly close to the barrier island may allow predator access, which will prevent nesting. We suggest that colonial waterbird professionals that are familiar with the nesting requirements of these species should review the design criteria for the beneficial use island.

The proposed location for this project is included within a popular fishing area known as the "Meadows". This area there is an extremely popular fishing spot in the Coastal

Bend. The seagrass beds that comprise the "meadows" are essential fish habitat that provides nursery and foraging areas for numerous fish species. The environmental analysis for this permit should address the impacts to the recreational use of this area with respect to boater access, changes to seagrass beds, changes to dynamics of fish species present, and changes in predator/prey relationships. Impacts to night sky and natural soundscapes and visitor safety during well development should also be addressed.

The proposed access channel appears to be placed in an un-vegetated portion of the area. Analysis should include an understanding of why this area is not vegetated or sparsely vegetated and how this particular area relates to the importance of the "meadows" ecosystem. It is possible that this un-vegetated area is necessary for the functionality of the "meadows". One possibility could be poor quality, high rates of erosion, etc.... This project has the potential to impact more seagrass acreage than the acreage affected by the removal of seagrasses through dredging an access channel. Analysis of these impacts is necessary to determine the full range of environmental impacts from this project.

It is possible that the proposed project will have important environmental impacts that need to be addressed in an environmental document whether it is an Environmental Assessment or Environmental Impact Statement. It is therefore the opinion of the National Park Service that this permit not be approved as currently proposed pending the outcome of adequate environmental analysis. The National Park Service appreciates the opportunity to comment on this project. If we can provide any additional information, please do not hesitate to contact Mr. Ken McMullen, Chief of Science and Resources Management at 361-949-8173 ext. 227.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. Whitworth", with a long, sweeping horizontal line extending to the right.

Jock F. Whitworth,
Superintendent

*** TX REPORT ***

TRANSMISSION OK

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CONNECTION TEL		8145912
CONNECTION ID		
ST. TIME	09/30 14:24	
USAGE T	01'50	
PGS.	4	
RESULT	OK	

FAX

Cover Sheet



U.S. Department of the Interior
National Park Service
Padre Island National Seashore
P.O. Box 181300
Corpus Christi, Texas 78480-1300
Tel. 361-949-8173 Fax 361-949-8286

FAX RECIPIENT: Marek Rottillo 361-814-5912

FROM: Padre Island National Seashore

SUBJECT: Comment of BWP Application # 22753

DATE: 30 Sept 02

COMMENTS: A hard copy is in the mail

FAX

Cover Sheet



U.S. Department of the Interior
National Park Service
Padre Island National Seashore
P.O. Box 181300
Corpus Christi, Texas 78480-1300
Tel. 361-949-8173 Fax 361-949-8286

FAX RECIPIENT: Marc R. Rattillo 361-814-5902

FROM: Padre Island National Seashore

Subject: Comment of BWP Application # 22754

Date: 30 Sept 02

COMMENTS: A hard copy is in the mail

Total Pages 4

U.S. DEPARTMENT OF THE INTERIOR NATIONAL PARK SERVICE PADRE ISLAND NATIONAL SEASHORE



Public Notice

**U.S. Army Corps
Of Engineers
Galveston District**

Permit Application No: 22754
Date Issued: August 27, 2002
Comments Due: September 30, 2002

U.S. ARMY CORPS OF ENGINEERS, GALVESTON DISTRICT

PURPOSE OF PUBLIC NOTICE: To inform you of a proposal for work in which you might be interested. It is also to solicit your comments and information to better enable us to make a reasonable decision on factors affecting the public interest. We hope you will participate in this process.

AUTHORITY: This application will be reviewed pursuant to Section 10 of the Rivers and Harbors Act of 1899 and Section 404 of the Clean Water Act.

APPLICANT: BNP Petroleum Corporation
500 North Water Street, Suite 1000
Corpus Christi, TX 78471-0035

AGENT: Belaire Environmental, Inc.
P.O. Box 741
Rockport, TX 78381-0741
Telephone 361-729-2948
POC: Mr. Charles Belaire

LOCATION: The project is located in the Laguna Madre in ST 211 approximately 14.5 miles south of the Bird Island basin boat ramp. The project can be located on the U.S.G.S. quadrangle map entitled: Point of Rocks, TX. Approximate UTM Coordinates: Zone 14; Easting: 658750; Northing: 3109875.

PROJECT DESCRIPTION: The applicant proposes to install, operate, and maintain structures and equipment necessary for oil and gas drilling, production, and transportation activities for the Plum/Peach well site. Such activities include installation of typical marine barges and keyways, access channels with basins, and production structures with attendant facilities. Approximately 89,382 cubic yards of material will be hydraulically dredged to create an access channel and basin and pumped into an armored levee site located in ST 214 in the Laguna Madre approximately 0.4 mile south of the basin area. The access channel will be

12,110 feet long, have a bottom width of 60 feet, and be approximately -7 feet MLT. Four three-pile clusters will be temporarily located along the access channel to provide two mooring locations during project construction and will be removed within 60 days after completion of the drilling operation if the well is a dryhole or within 60 days after construction of the production facilities if the well is productive. Two additional clusters will be permanently located in the basin to provide mooring. The basin will be irregularly shaped with a maximum length of 435 feet and a maximum width of 210 feet. The excavated material will be used to create a 14-acre beneficial-use island for bird nesting in unvegetated shallow water approximately -3 feet MLT. The island will be contoured so that approximately 30% of its area will be at an elevation suitable for trees such as honey mesquite and spiny hackberry. Another 30% will be at elevations that will support sparse to no vegetation. Herbaceous species such as sea ox-eye daisy and Carolina wolfberry are expected to grow in the area beneath the trees and the sparsely vegetated area. The applicant's plans are enclosed in 14 sheets.

NOTES: This public notice is being issued based on information furnished by the applicant. This information has not been verified.

A preliminary review of this application indicates that an Environmental Impact Statement (EIS) is not required. Since permit assessment is a continuing process, this preliminary determination of EIS requirement will be changed if data or information brought forth in the coordination process is of a significant nature.

Our evaluation will also follow the guidelines published by the U.S. Environmental Protection Agency pursuant to Section 404 (b)(1) of the Clean Water Act (CWA).

OTHER AGENCY AUTHORIZATIONS: Texas Railroad Commission certification is required.

Texas Coastal Zone consistency certification is required. The applicant has stated that the project is consistent with the Texas Coastal Management Program goals and policies and will be conducted in a manner consistent with said Program.

NATIONAL REGISTER OF HISTORIC PLACES: The staff archaeologist has reviewed the latest published version of the National Register of Historic Places, lists of properties determined eligible, and other sources of information. The following is current knowledge of the presence or absence of historic properties and the effects of the undertaking upon these properties: The State tracts proposed for work under this permit application are not included in the Texas Antiquity Committee's list of tracts containing State Archaeological Landmarks. Therefore, the proposed activities are not likely to affect pre-20th-century shipwrecks.

THREATENED AND ENDANGERED SPECIES: Preliminary indications are that no known threatened and/or endangered species or their critical habitat will be affected by the proposed work.

ESSENTIAL FISH HABITAT: This notice initiates the Essential Fish Habitat consultation requirements of the Magnuson-Stevens Fishery Conservation and Management Act. Our initial determination is that the proposed action would not have a substantial adverse impact on Essential Fish Habitat or Federally managed fisheries in the Gulf of Mexico. Our final determination relative to project impacts and the need for mitigation measures is subject to review by and coordination with the National Marine Fisheries Service.

PUBLIC INTEREST REVIEW FACTORS: This application will be reviewed in accordance with 33 CFR 320-330, the Regulatory Programs of the Corps of Engineers, and other pertinent laws, regulations and executive orders. The decision whether to issue a permit will be based on an evaluation of the probable impacts, including cumulative impacts, of the proposed activity on the public interest. That decision will reflect the national concern for both protection and utilization of important resources. The benefits, which reasonably may be expected to accrue from the proposal, must be balanced against its reasonably foreseeable detriments. All factors, which may be relevant to the proposal, will be considered: among those are conservation, economics, aesthetics, general environmental concerns, wetlands, historic properties, fish and wildlife values, flood hazards, floodplain values, land use, navigation, shore erosion and accretion, recreation, water supply and conservation, water quality, energy needs, safety, food and fiber production, mineral needs and, in general, the needs and welfare of the people.

SOLICITATION OF COMMENTS: The Corps of Engineers is soliciting comments from the public, Federal, State, and local agencies and officials, Indian tribes, and other interested parties in order to consider and evaluate the impacts of this proposed activity. Any comments received will be considered by the Corps of Engineers to determine whether to issue, modify, condition or deny a permit for this proposal. To make this decision, comments are used to assess impacts on endangered species, historic properties, water quality, general environmental effects, and the other public interest factors listed above. Comments are used in the preparation of an Environmental Impact Assessment and/or an Environmental Impact Statement pursuant to the National Environmental Policy Act. Comments are also used to determine the need for a public hearing and to determine the overall public interest of the proposed activity.

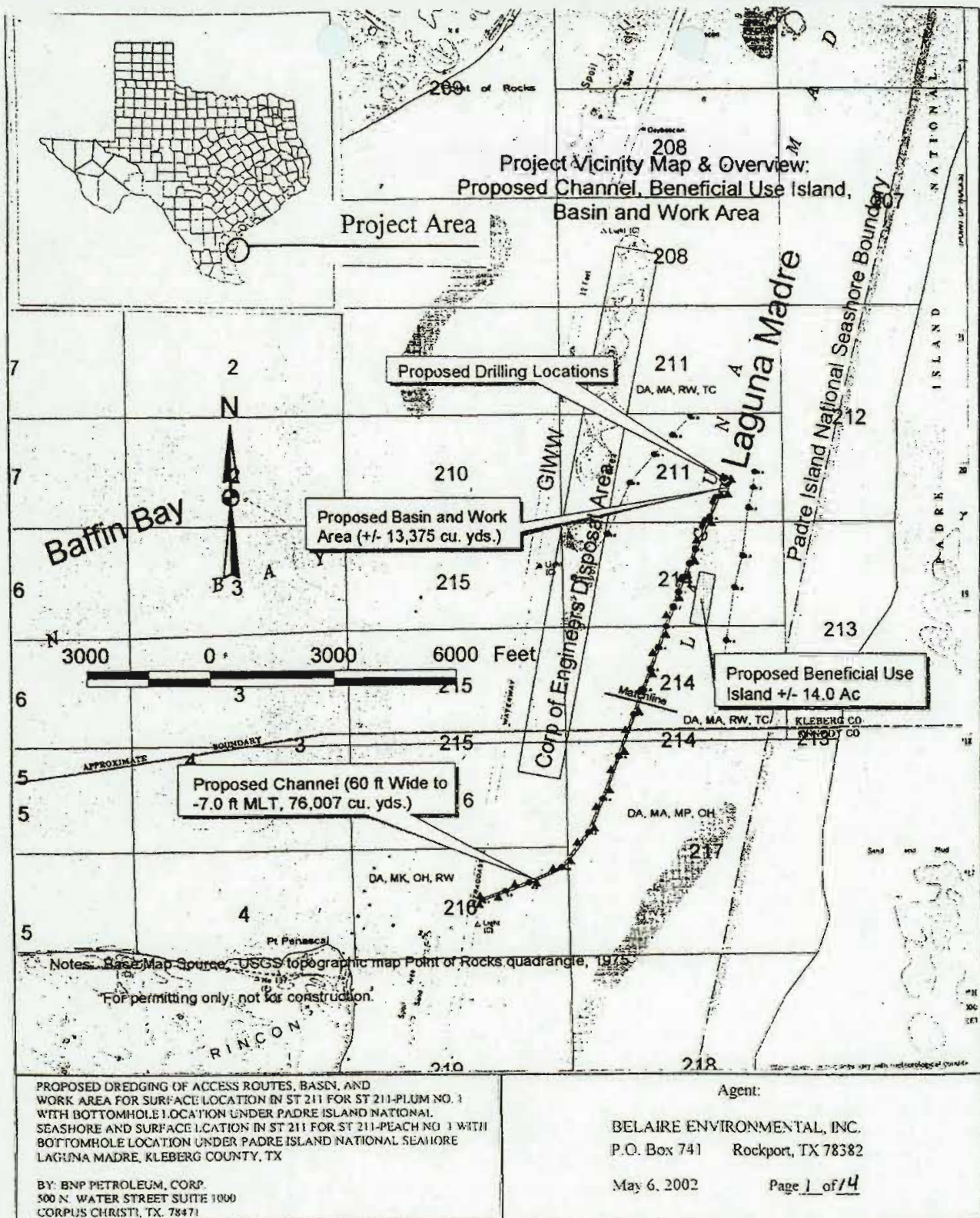
This public notice is being distributed to all known interested persons in order to assist in developing facts upon which a decision by the Corps of Engineers may be based. For accuracy and completeness of the record, all data in support of or in opposition to the proposed work should be submitted in writing setting forth sufficient detail to furnish a clear understanding of the reasons for support or opposition.

PUBLIC HEARING: Prior to the close of the comment period any person may make a written request for a public hearing setting forth the particular reasons for the request. The District Engineer will determine whether the issues are substantial and should be considered in the permit decision. If a public hearing is warranted, all known interested persons will be notified of the time, date, and location.

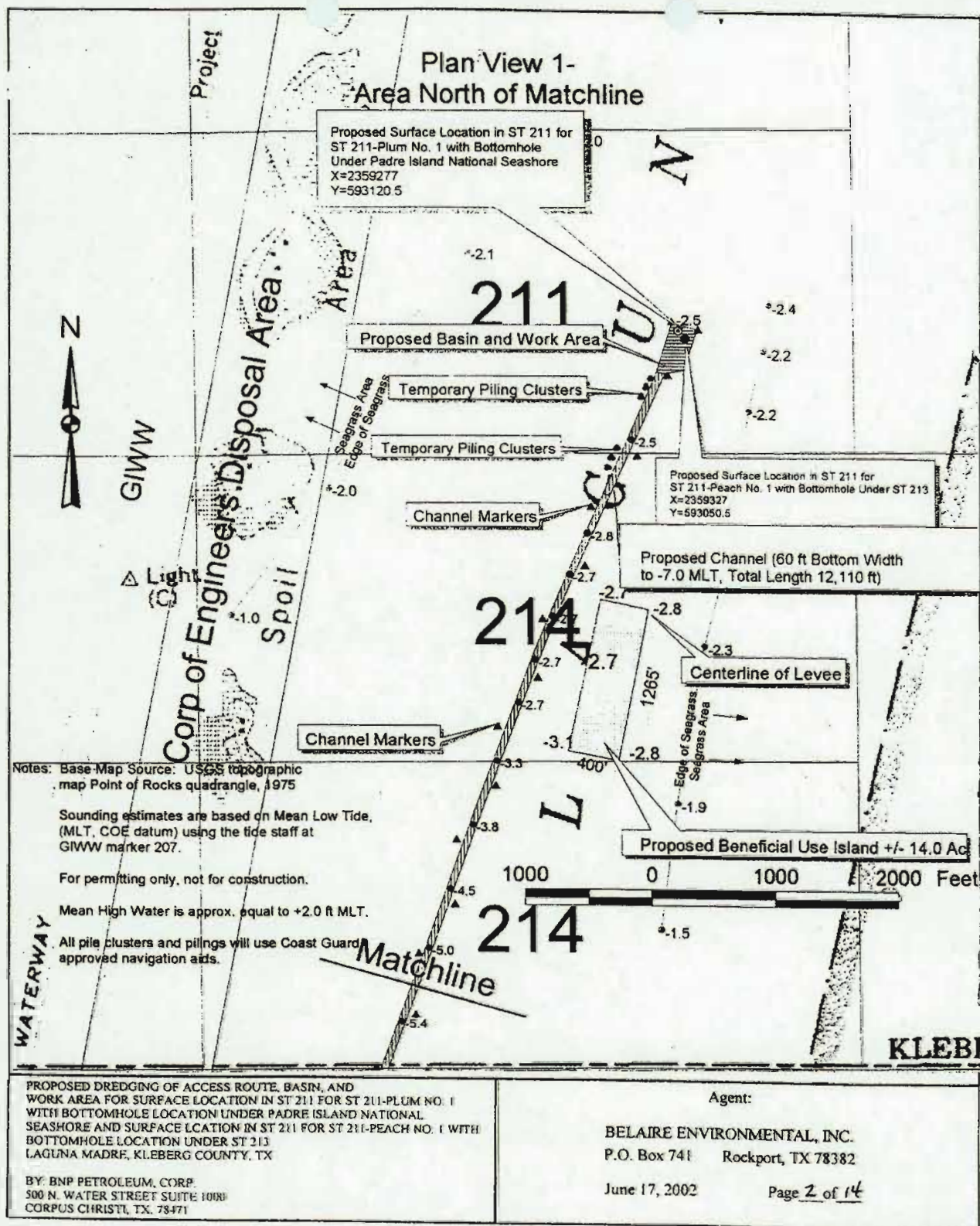
CLOSE OF COMMENT PERIOD: All comments pertaining to this Public Notice must reach this office on or before **September 30, 2002**. Extensions of the comment period may be granted for valid reasons provided a written request is received by the limiting date. **If no comments are received by that date, it will be considered that there are no objections.** Comments and requests for additional information should be submitted to:

MARK PATTILLO
Regulatory Branch, CESWG-PE-RB
U.S. Army Corps of Engineers
5151 Flynn Parkway, Suite 306
Corpus Christi, Texas 78411-4318
361-814-5847 Phone
361-814-5912 Fax

DISTRICT ENGINEER
GALVESTON DISTRICT
CORPS OF ENGINEERS

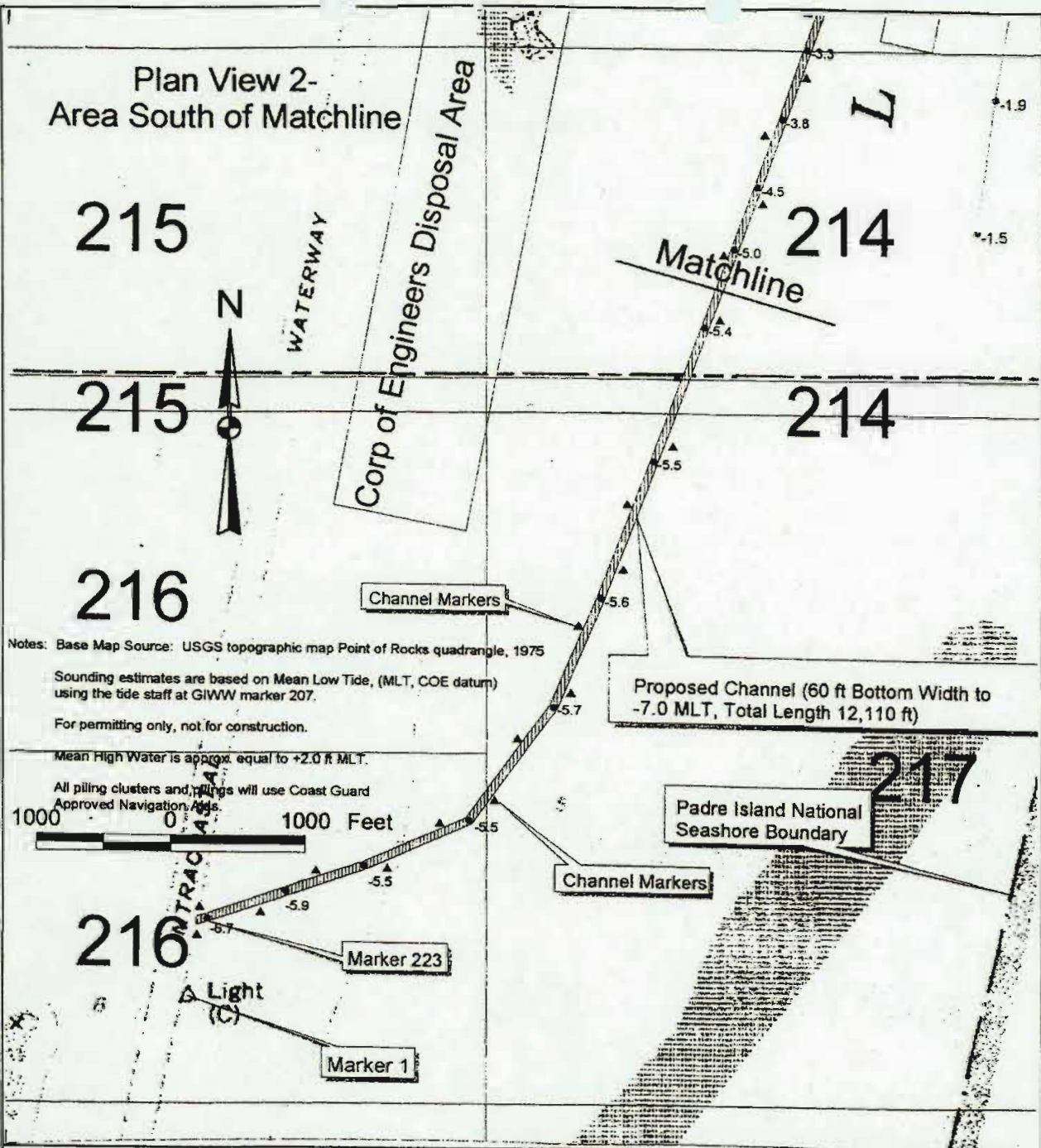


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Plan View 2-
Area South of Matchline



PROPOSED DREDGING OF ACCESS ROUTE, BASIN, AND WORK AREA FOR SURFACE LOCATION IN ST 211 FOR ST 211-PLUM NO. 1 WITH BOTTOMHOLE LOCATION UNDER PADRE ISLAND NATIONAL SEASHORE AND SURFACE LOCATION IN ST 211 FOR ST 211-PEACH NO. 1 WITH BOTTOMHOLE LOCATION UNDER ST 213 LAGUNA MADRE, KLEBERG COUNTY, TX

BY: BNP PETROLEUM, CORP
500 N. WATER STREET SUITE 1000
CORPUS CHRISTI, TX 78471

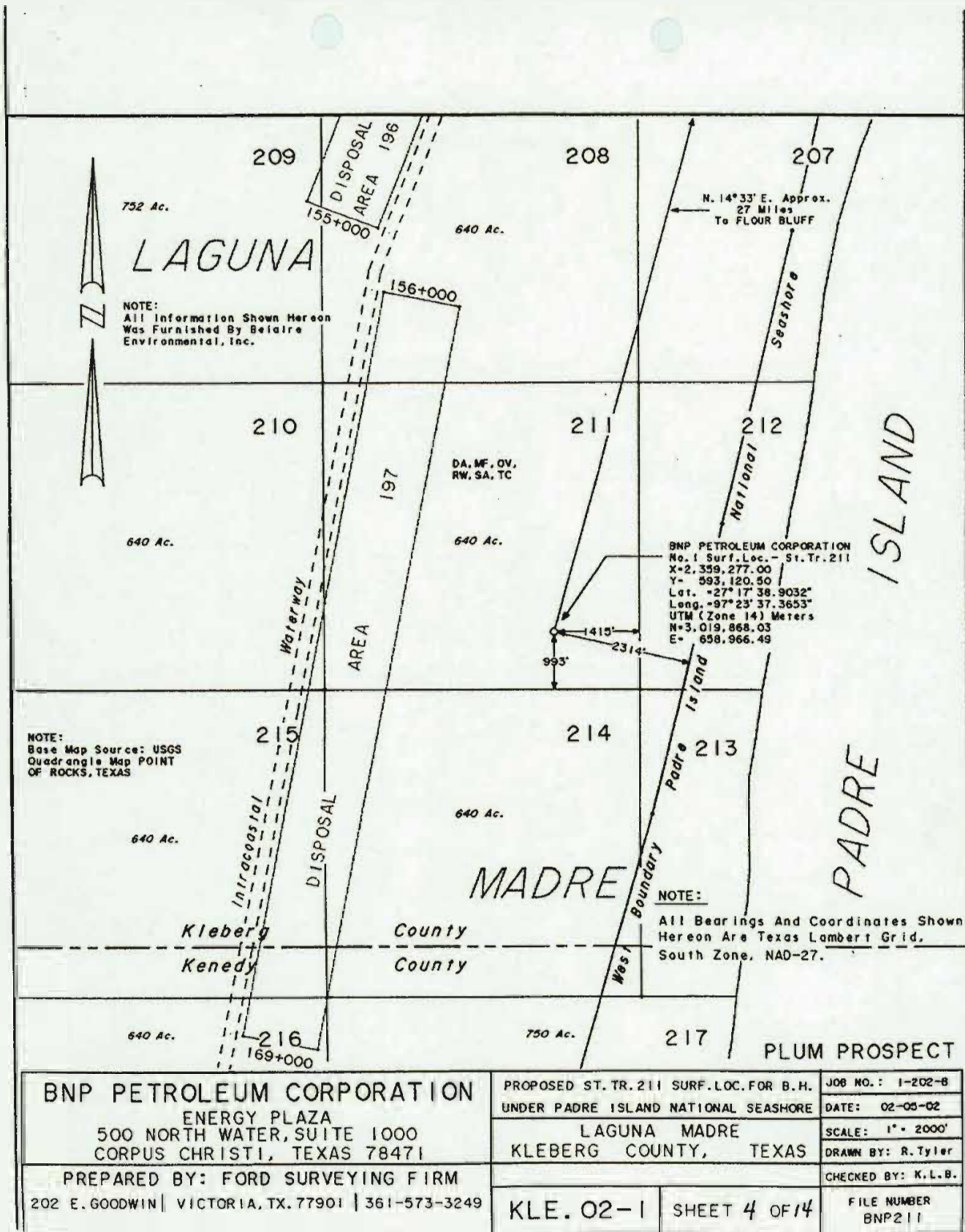
Agent:

BELAIRE ENVIRONMENTAL, INC.
P.O. Box 741 Rockport, TX 78382

June 17, 2002

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BNP PETROLEUM CORPORATION

ENERGY PLAZA
500 NORTH WATER, SUITE 1000
CORPUS CHRISTI, TEXAS 78471

PREPARED BY: FORD SURVEYING FIRM

202 E. GOODWIN | VICTORIA, TX. 77901 | 361-573-3249

PROPOSED ST. TR. 211 SURF. LOC. FOR B.H.
UNDER PADRE ISLAND NATIONAL SEASHORE

LAGUNA MADRE
KLEBERG COUNTY, TEXAS

KLE. 02-1

SHEET 4 OF 14

JOB NO.: 1-202-8

DATE: 02-05-02

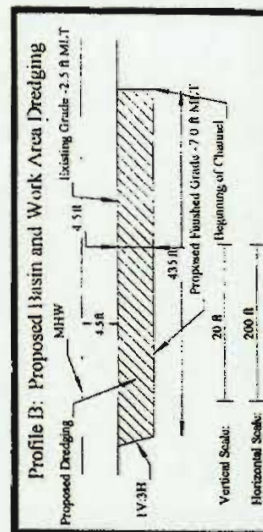
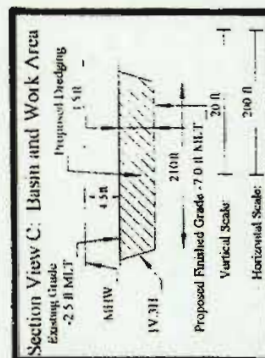
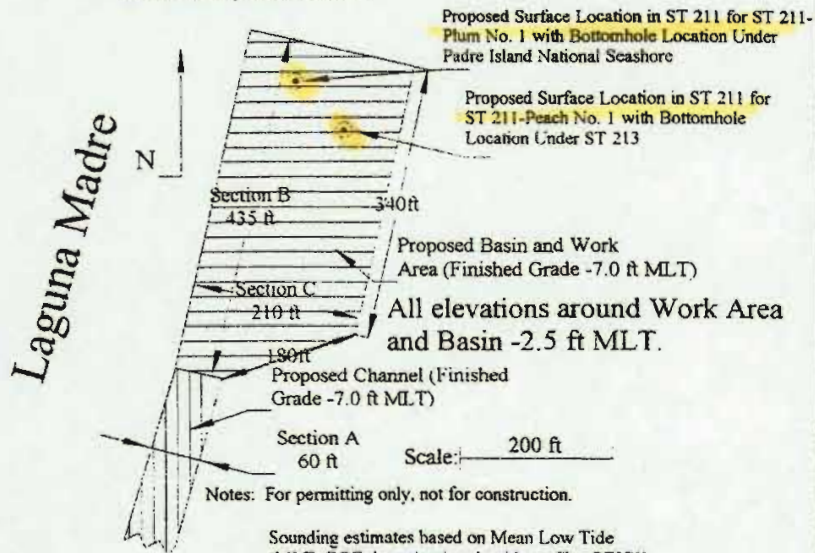
SCALE: 1" = 2000'

DRAWN BY: R. Tyler

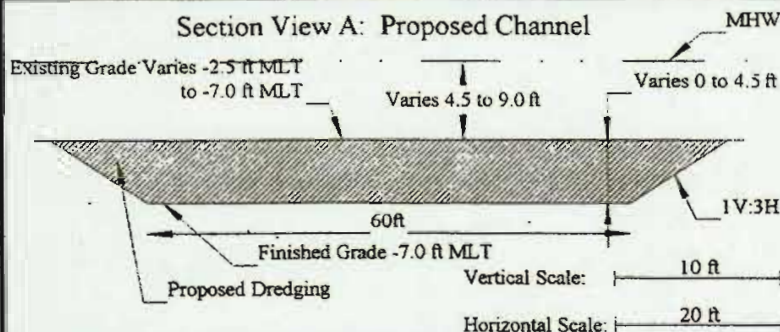
CHECKED BY: K.L.B.

FILE NUMBER
BNP211

Plan View: Proposed Channel, Work area, and Basin



Section View A: Proposed Channel



Notes: For permitting only, not for construction.

Sounding estimates based on Mean Low Tide (MLT, COE datum) using the tide staff at GFWW marker 207.

Mean High Water is approx. equal to +2.0 Mean Low Tide.

PROPOSED DREDGING OF ACCESS ROUTE, BASIN, AND WORK AREA FOR SURFACE LOCATION IN ST 211 FOR ST 211-PLUM NO. 1 WITH BOTTOMHOLE LOCATION UNDER PADRE ISLAND NATIONAL SEASHORE AND SURFACE LOCATION IN ST 211 FOR ST 211-PEACH NO. 1 WITH BOTTOMHOLE LOCATION UNDER ST 213 LAGUNA MADRE, KLEBERG COUNTY, TX

BY: BNP PETROLEUM, CORP
500 N. WATER STREET SUITE 1000
CORPUS CHRISTI, TX 78471

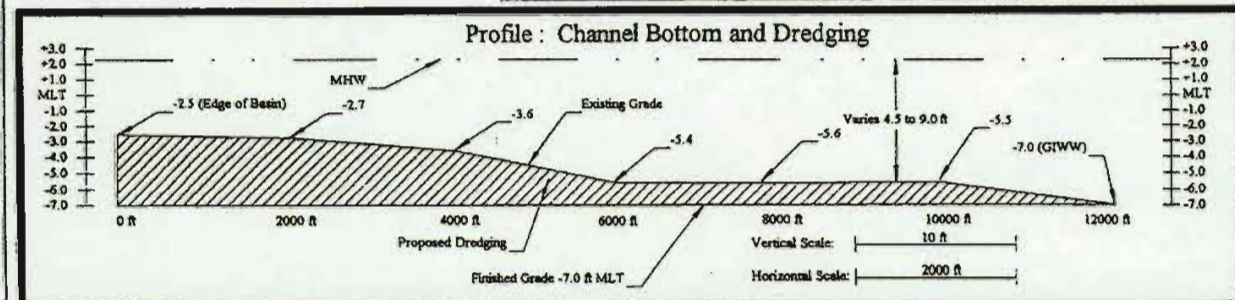
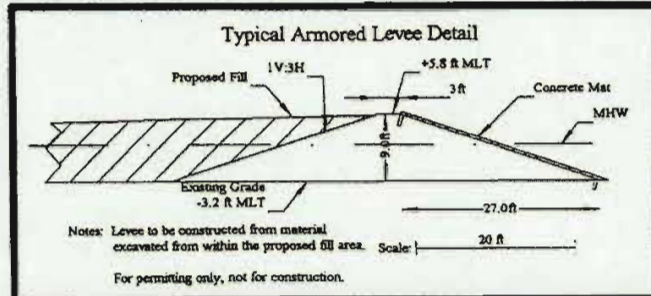
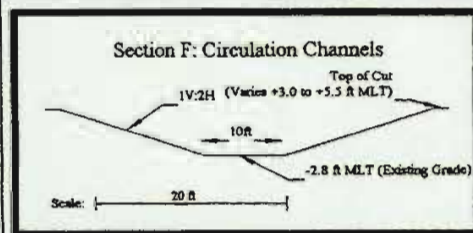
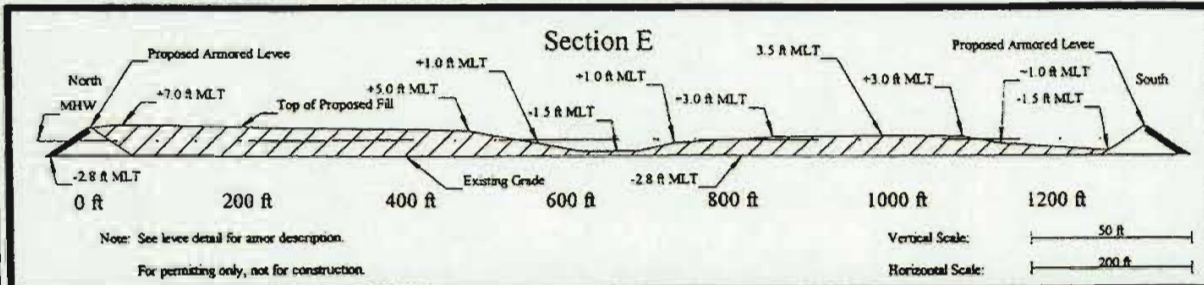
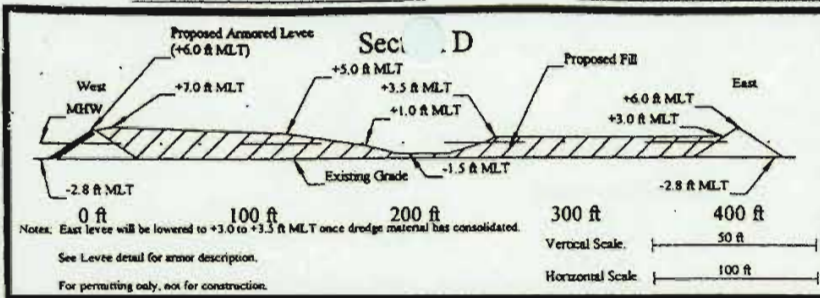
Agent:

BELAIRE ENVIRONMENTAL, INC.
P.O. Box 741 Rockport, TX 78382

June 17, 2002

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Notes: For permitting only, not for construction.

Sounding estimates based on Mean Low Tide (MLT, COE datum) using the tide staff at GIWW marker 207.

Mean High Water is approx. equal to +2.0 Mean Low Tide.

PROPOSED DREDGING OF ACCESS ROUTES, BASIN, AND WORK AREA FOR SURFACE LOCATION IN ST 211 FOR ST 211-PLUM NO 1 WITH BOTTOMHOLE LOCATION UNDER PADRE ISLAND NATIONAL SEASHORE AND SURFACE LOCATION IN ST 211 FOR ST 211-PEACH NO. 1 WITH BOTTOMHOLE LOCATION UNDER PADRE ISLAND NATIONAL SEASHORE LAGUNA MADRE, KLEBERG COUNTY, TX

BY: BNP PETROLEUM, CORP.
500 N. WATER STREET SUITE 1000
CORPUS CHRISTI, TX 78471

Agent:

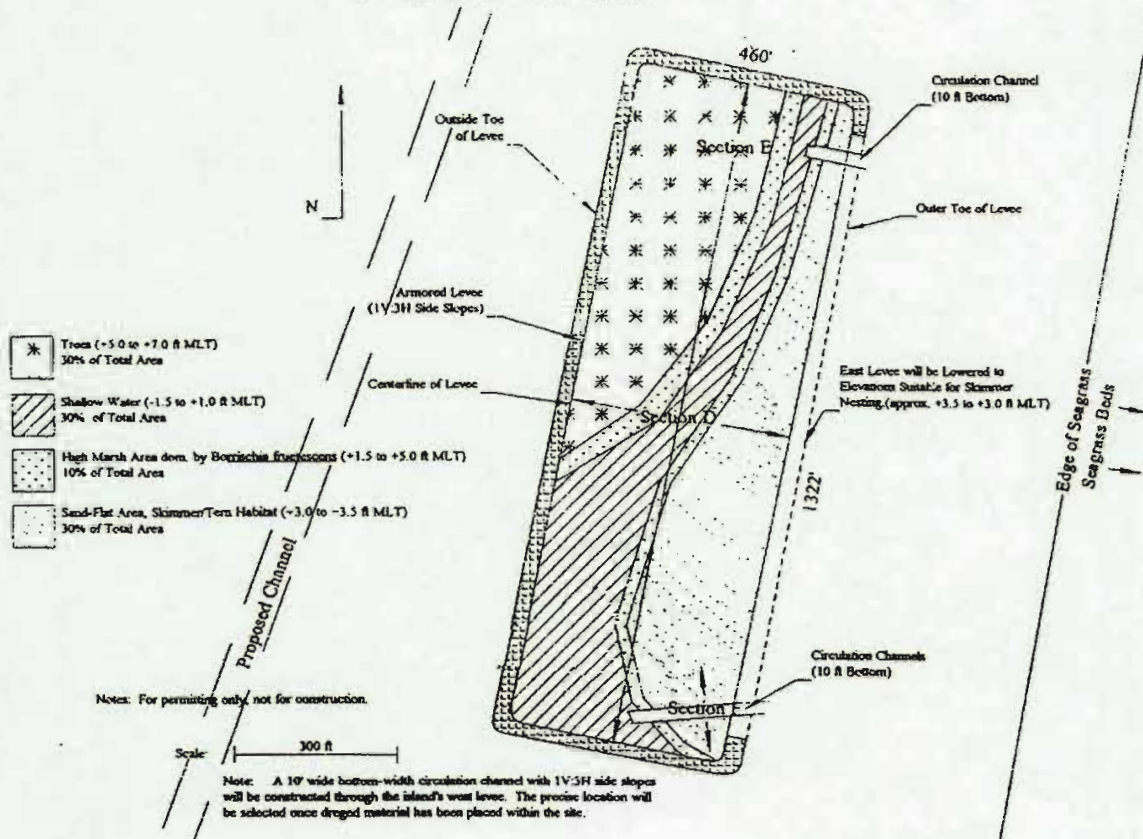
BELAIRE ENVIRONMENTAL, INC.
P.O. Box 741 Rockport, TX 78382

May 6, 2002

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Plan View-Proposed Beneficial Use Island
+/- 14.0 Acres Total Area



PROPOSED DREDGING OF ACCESS ROUTE, BASIN, AND WORK AREA FOR SURFACE LOCATION IN ST 211 FOR ST 211-PLUM NO 1 WITH BOTTOMHOLE LOCATION UNDER PADRE ISLAND NATIONAL SEASHORE AND SURFACE LOCATION IN ST 211 FOR ST 211-PEACH NO 1 WITH BOTTOMHOLE LOCATION UNDER ST 213 LAGUNA MADRE, KLEBERG COUNTY, TX

BY: BNP PETROLEUM, CORP.
500 N WATER STREET SUITE 1000
CORPUS CHRISTI, TX 78471

Agent:

BELAIRE ENVIRONMENTAL, INC.
P.O. Box 741 Rockport, TX 78382

June 17, 2002

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BNP PETROLEUM CORPORATION
NOTES: BENEIFCIAL USE OF DREDGED MATERIAL

1. The applicant proposes to beneficially use the dredge material. The applicant will hydraulically dredge approximately 89,382 cu yds of material from the channel and basin to access drilling for S.T. 211-Plum No.1 and S.T. 211-Peach No. 2. The material will be pumped into an armored, leveed site. The dredged material will be placed to create nesting habitat for a variety of bird species.
2. Approximately 30 % of the site will be at elevations sufficient to support trees such as honey mesquite (*Prosopis glandulosa*) and spiny hackberry (*Celtis pallida*). Another approximately 30% of the site will be at elevations that will support sparse or no vegetation. The area at elevations below the tree habitat and the predominantly unvegetated area will support salt marsh species such as sea ox-eye daisy (*Borrchia frutescens*) and Carolina wolfberry (*Lycium carolinianum*). It is anticipated that the tree and woody habitats will serve as nesting sites for herons, egrets, and associated species. The lower, predominantly unvegetated habitat is expected to provide nesting areas for terns, skimmers, and associated species.
3. The actual locations and surface area of habitats on the beneficial use island may vary somewhat from those stated in no. 2, above, due to the difficulty in shaping hydraulically dredged material. The above percentages should be considered approximations.
4. Planting will occur in the first growing season after consolidation of the dredge material. Trees will be planted on 20-ft centers. Salt marsh species will be planted on 3-ft centers. Trees will be installed in late winter or early spring. If necessary, trees and salt marsh species will be watered on a weekly basis during the initial six weeks after planting.
5. The planted trees and salt marsh species will be monitored for survival 60 days after planting. If fewer than 50 % of the transplants are living the areas will be replanted to original specifications within 60 days. The habitat will be monitored six months, one year, two years, and three years after initial planting. Reports, including complete photographic coverage, will be forwarded to the COE and resource agencies. Any unusual erosion or sedimentation patterns observed will be reported.
6. If 50 % of the trees are not living after two years they will be replanted to original specifications within 60 days. If salt marsh species have less than 50 % coverage at the two-year monitoring, the area will be replanted to original specifications within 60 days.
7. The proposed beneficial use site was planned and situated through the coordination with a number of experts. It is anticipated that the island will provide much needed nesting habitat that is free of significant predator activity.

PROPOSED DREDGING OF ACCESS ROUTES, BASIN, AND
WORK AREA FOR SURFACE LOCATION IN ST 211 FOR ST 211-PLUM NO. 1
WITH BOTTOMHOLE LOCATION UNDER PADRE ISLAND NATIONAL
SEASHORE AND SURFACE LOCATION IN ST 211 FOR ST 211-PEACH NO. 1 WITH
BOTTOMHOLE LOCATION UNDER ST 211
LAGUNA MADRE, KLEBERG COUNTY, TX

BY: BNP PETROLEUM, CORP.
500 N. WATER STREET SUITE 1000
CORPUS CHRISTI, TX. 78471

Agent:

BELAIRE ENVIRONMENTAL, INC.
P.O. Box 741 Rockport, TX 78382

May 6, 2002

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Recommended Resource Management Codes

ST 211

- DA-No dredging on this tract.
- MA-No special recommendations.
- RW-Navigational concerns such as navigational channels, dredge material placement areas, safety fairways, and anchorage areas exist within this tract.
- TC-Bird rookeries are located on or near this tract. No drilling, dredging, seismic exploration, construction activity, or watercraft landing within 1000 feet of a rookery during nesting season between February 15 and September 1.

ST 214

- DA-No dredging on this tract.
- MA-No special recommendations.
- MP-Work in this tract is subject to special recommendations, restrictions, or special use permits from federal or state agencies.
- RW-Navigational concerns such as navigational channels, dredge material placement areas, safety fairways, and anchorage areas exist within this tract.
- TC-Bird rookeries are located on or near this tract. No drilling, dredging, seismic exploration, construction activity, or watercraft landing within 1000 feet of a rookery during nesting season between February 15 and September 1.

ST 216

- DA-No dredging on this tract.
- MK-State Archeological Landmarks and/or other cultural resources protected by state law are known to be or may be located on this tract and should not be disturbed.
- OH-Drill only from water deeper than 6 feet as measured from mean low water, or from land above mean high water.
- RW-Navigational concerns such as navigational channels, dredge material placement areas, safety fairways, and anchorage areas exist within this tract.

ST 217

- DA-No dredging on this tract.
- MA-No special recommendations.
- MP-Work in this tract is subject to special recommendations, restrictions, or special use permits from federal or state agencies.
- OH-Drill only from water deeper than 6 feet as measured from mean low water, or from land above mean high water.

Notes Regarding Spill Containment

1. A minimum of 500 feet of 18 inch boom and 200 absorbent pad will be maintained on site during drilling operations.
2. There will be at least one employee on board at all times during drilling who is trained in boom deployment and oil spill responses.
3. Sufficient oil spill boom will be anchored and maintained across the keyway to contain un-anticipated upsets. The boomed keyway will be checked on a daily basis and changed as needed.
4. All hydrocarbon operation, including diesel fuel, motor oil and lubricants will be conducted during daylight hours.
5. In accordance with EPA NPDES General Permits TXG330000 and TXG290000 there will be no discharge of produced water, drilling muds, drill cuttings and other fluids associated with the drilling process into the waters of the Laguna Madre.

PROPOSED DREDGING OF ACCESS ROUTE, BASIN, AND WORK AREA FOR SURFACE LOCATION IN ST 211 FOR ST 211-PLUM NO. 1 WITH BOTTOMHOLE LOCATION UNDER PADRE ISLAND NATIONAL SEASHORE AND SURFACE LOCATION IN ST 211 FOR ST 211-PEACH NO. 1 WITH BOTTOMHOLE LOCATION UNDER ST 213 LAGUNA MADRE, KLEBERG COUNTY, TX

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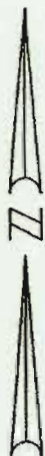
Agent:

BELAIRE ENVIRONMENTAL, INC.
P.O. Box 741 Rockport, TX 78382

May 6, 2002

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22754



LAGUNA

X=2,359,224.00
Y= 593,188.00

BNP PETROLEUM CORPORATION
No. 1 Surf. Loc. ST. Tr. 211
X=2,359,277.00
Y= 593,120.00

X=2,359,425.50
Y= 593,129.00

X=2,359,101.00
Y= 592,770.00

X=2,259,327.00
Y= 592,798.00

X=2,359,159.00
Y= 592,753.00

BASIN

MADRE

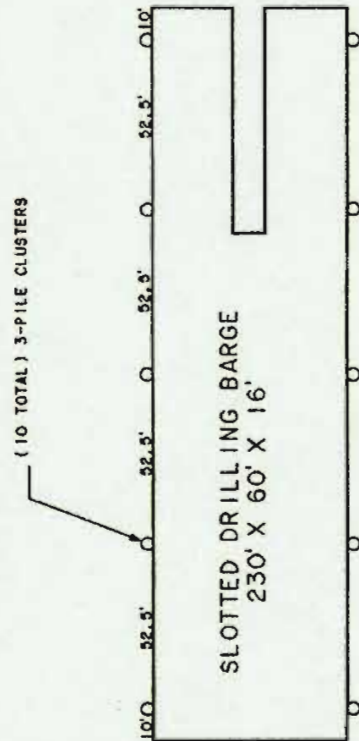
TYPICAL DRILLING RIG
& SUPPORT VESSELS

PLUM PROSPECT

BNP PETROLEUM CORPORATION ENERGY PLAZA 500 NORTH WATER, SUITE 1000 CORPUS CHRISTI, TEXAS 78471	PROPOSED ST. TR. 211 SURF. LOC. FOR B.H.		JOB NO.: 1-202-B
	UNDER PADRE ISLAND NATIONAL SEASHORE		DATE: 02-05-02
	LAGUNA MADRE KLEBERG COUNTY, TEXAS		SCALE: 1" = 100'
			DRAWN BY: R. Tyler
PREPARED BY: FORD SURVEYING FIRM 202 E. GOODWIN VICTORIA, TX. 77901 361-573-3249			CHECKED BY: K.L.B.
	KLE. 02-1	SHEET 10 OF 14	FILE NUMBER BNP211A

22754

TYPICAL SLOTTED DRILLING BARGE

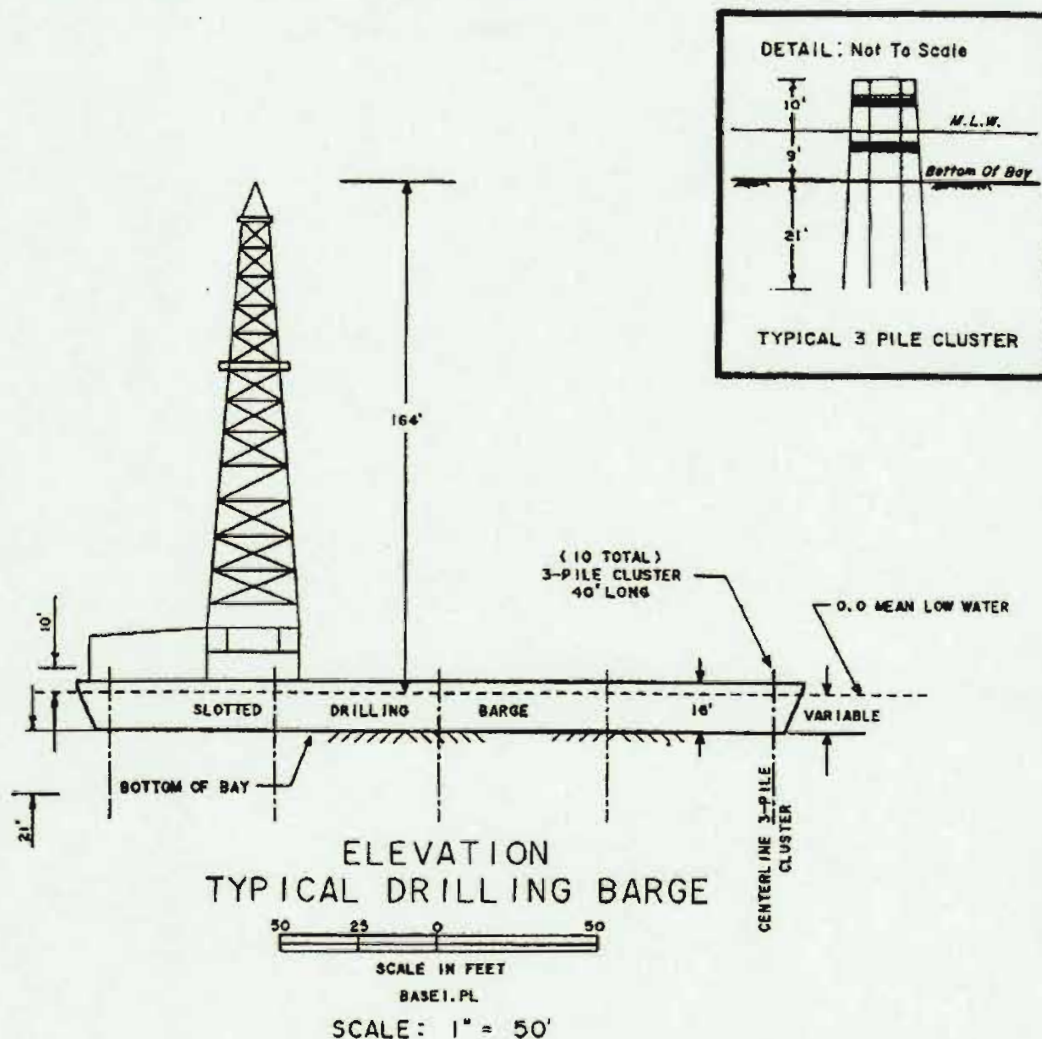


SCALE: 1" = 50'
BASE2.PL

PLUM PROSPECT

BNP PETROLEUM CORPORATION ENERGY PLAZA 500 NORTH WATER, SUITE 1000 CORPUS CHRISTI, TEXAS 78471	PROPOSED ST. TR. 211 SURF. LOC. FOR B.H. UNDER PADRE ISLAND NATIONAL SEASHORE		JOB NO.: 1-202-8 DATE: 02-05-02
	LAGUNA MADRE KLEBERG COUNTY, TEXAS		SCALE: SHOWN DRAWN BY: R. Tyler
PREPARED BY: FORD SURVEYING FIRM 202 E. GOODWIN VICTORIA, TX. 77901 361-573-3249			CHECKED BY: K.L.B.
	KLE. 02-1	SHEET 11 OF 14	FILE NUMBER BNP211

22754



PLUM PROSPECT

BNP PETROLEUM CORPORATION ENERGY PLAZA 500 NORTH WATER, SUITE 1000 CORPUS CHRISTI, TEXAS 78471	PROPOSED ST. TR. 211 SURF. LOC. FOR B.H. UNDER PADRE ISLAND NATIONAL SEASHORE		JOB NO.: 1-202-B
	LAGUNA MADRE KLEBERG COUNTY, TEXAS		DATE: 02-05-02
PREPARED BY: FORD SURVEYING FIRM 202 E. GOODWIN VICTORIA, TX. 77901 361-573-3249			SCALE: SHOWN
			DRAWN BY: R. Tyler
			CHECKED BY: K.L.B.
	KLE. 02-1	SHEET 12 OF 14	FILE NUMBER BNP211

22754



LAGUNA

X=2,359,224.00
Y= 593,188.00

BNP PETROLEUM CORPORATION
No. 1 Surf. Loc. ST. Tr. 211
X=2,359,277.00
Y= 593,120.00

X=2,359,425.50
Y= 593,129.00

WELL
PROTECTOR

BASIN

X=2,359,101.00
Y= 592,770.00

X=2,259,327.00
Y= 592,798.00

X=2,359,159.00
Y= 592,753.00

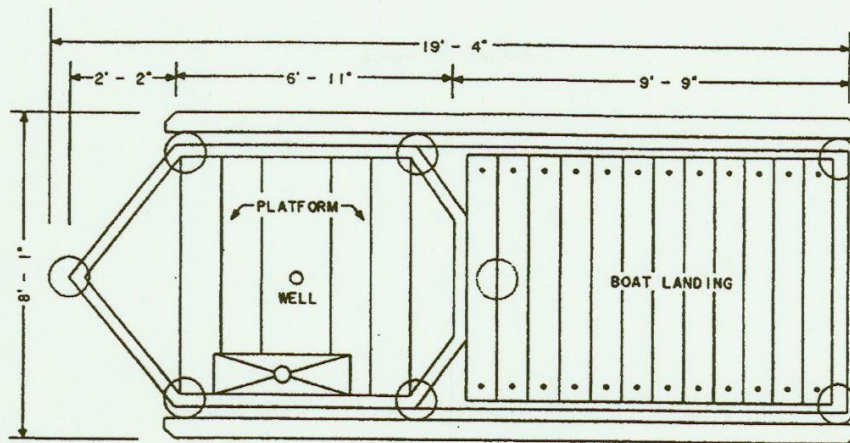
MADRE

PROPOSED
WELL PROTECTOR

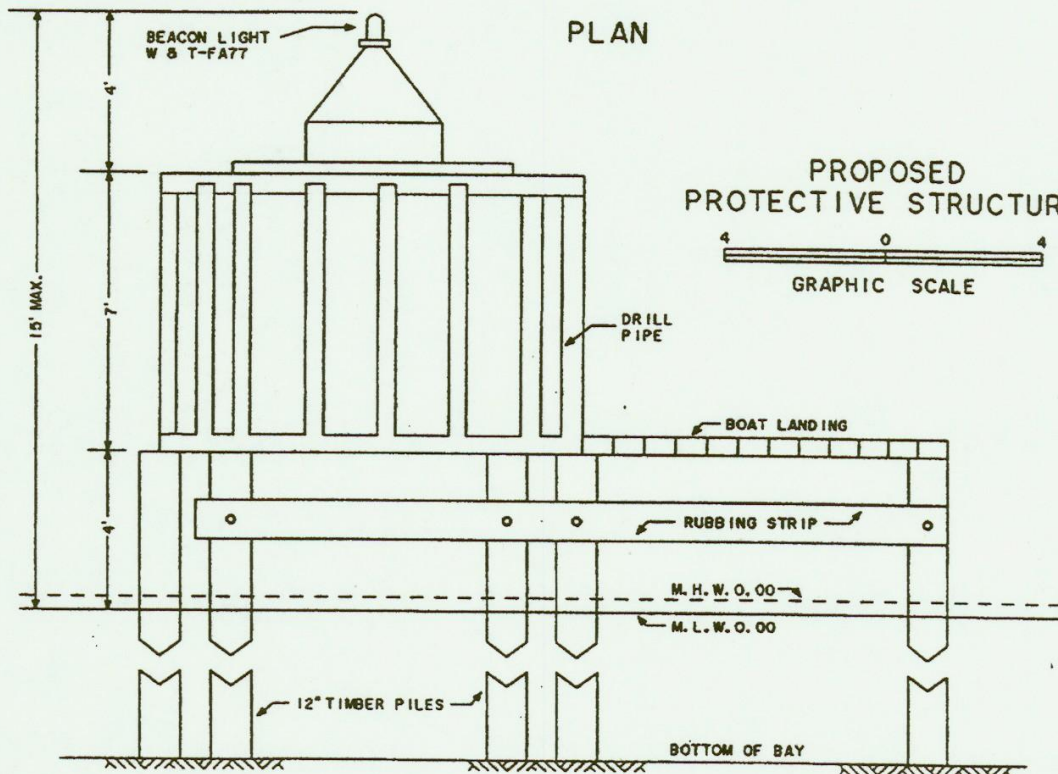
PLUM PROSPECT

BNP PETROLEUM CORPORATION ENERGY PLAZA 500 NORTH WATER, SUITE 1000 CORPUS CHRISTI, TEXAS 78471	PROPOSED ST. TR. 211 SURF. LOC. FOR B.H.		JOB NO.: 1-202-B
	UNDER PADRE ISLAND NATIONAL SEASHORE		DATE: 02-05-02
PREPARED BY: FORD SURVEYING FIRM 202 E. GOODWIN VICTORIA, TX. 77901 361-573-3249	LAGUNA MADRE KLEBERG COUNTY, TEXAS		SCALE: 1" = 100'
			DRAWN BY: R. Tyler
		CHECKED BY: K.L.B.	
KLE. 02-1		SHEET 13 OF 14	FILE NUMBER BNP211A

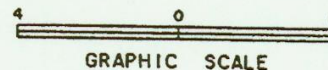
22754



PLAN



PROPOSED
PROTECTIVE STRUCTURE



PLUM PROSPECT

BNP PETROLEUM CORPORATION

ENERGY PLAZA
500 NORTH WATER, SUITE 1000
CORPUS CHRISTI, TEXAS 78471

PREPARED BY: FORD SURVEYING FIRM

202 E. GOODWIN | VICTORIA, TX. 77901 | 361-573-3249

PROPOSED ST. TR. 211 SURF. LOC. FOR B.H.
UNDER PADRE ISLAND NATIONAL SEASHORE

LAGUNA MADRE
KLEBERG COUNTY, TEXAS

JOB NO.: 1-202-B

DATE: 02-05-02

SCALE: SHOWN

DRAWN BY: R. Tyler

CHECKED BY: K.L.B.

KLE. 02-1

SHEET 14 OF 14

FILE NUMBER
BNP211

22754