

Jim C Woods

06/07/02 03:31 PM
MDT

To: Jock Whitworth/PAIS/NPS@NPS
cc: Ken McMullen/PAIS/NPS@NPS, Arlene Wimer/PAIS/NPS@NPS,
Carol McCoy/DENVER/NPS@NPS, Edward
Kassman/DENVER/NPS@NPS, Pat O'Dell/DENVER/NPS@NPS,
Lisa Norby/DENVER/NPS@NPS
Subject: Question/Issues for PAIS's Meeting on Plum

Jock,

Below is a list of questions/issues raised by GRD staff that you may want to discuss during the meeting next week regarding the BNP Plum/Peach proposed drilling operations. Please feel free to contact any of us if you have questions or want to discuss further. Have a great weekend!!

Jim

----- Forwarded by Jim C Woods/DENVER/NPS on 06/07/2002 03:24 PM -----



Pat O'Dell

06/07/2002 02:23 PM
MDT

To: Jim C Woods/DENVER/NPS@NPS
cc:
Subject: Question/Issues for PAIS's Meeting on Plum

Jim,

The questions/issues that PAIS might bring up with the other agencies and BNP at next week's meeting follow. Could you take a look at them and then forward them to PAIS. Let me know if you need anything else at this time. I left our names tied to the specific questions or items so that PAIS could call directly if they needed any clarification, etc.

Pat

The Division provides the following topics of discussion for your meeting with the COE concerning BNP's Plum and Peach prospects:

From Jim Woods:

- TX GLO involvement in scoping to determine applicability of State tract resource management codes and latitude for negotiation with BNP to mitigate potential impacts to state resources in Laguna Madre
- Methods to prevent/minimize silt distribution into park waters/seagrass beds resulting from dredging and spoil deposition.
- Oil spill contingency plan for drilling and production operations.
- Location of shorebase staging facility to service (equipment, supplies, crews, etc.) the drilling operation and wellhead.

From Pat O'Dell (these are questions for BNP):

- ✕ It seems to me that we are not hearing the whole story from BNP. The permitting and cost differences from drilling on the island and out in the Laguna Madre do not seem to automatically lead to a location out in the water – especially since production facilities will most likely need to be permitted and located on the seashore.
- Why the avoidance of the COE disposal area. Would the COE rather permit a much longer route and thus more

disturbance rather than provide access to BNP through their disposal area? Or perhaps is BNP thinking about future offshoots for additional well locations along the dredged route?

our
EA

Should one or both of the wells drilled from the surface location in State Tract 111 be successful, what does BNP anticipate in terms of field delineation and development? How does this drilling location fit in with possible development of each of the prospects if they are proved up? Are there any other prospects in the immediate area that BNP may propose in the foreseeable future?

Yes - but not to discuss here -
Later proposal.

From Lisa Norby:

Is there a possibility that the Plum prospect could be drilled onshore from a previously disturbed Vector site? The threat of impacts to park resources could be less and the NPS would have more control over requiring mitigation and monitoring of the operation. Also, additional wells could possibly be drilled from a single pad, reducing future surface disturbance in the park.

Pad the island is
1200-1500' - 2300' to boundary

clarify

What is the actual distance of the surface location of the Plum well from the land in the park? In the COE application (sheet 16 of 21), it appears that the island is located approximately 3400 feet from the surface location rather than the 7000 feet that is stated in BNP's letter to Supt. Whitworth dated May 15, 2002. If this is true, the potential impacts on park resources are greater than are presented by BNP due to the proximity to park resources.

no

Does the COE have a problem with BNP constructing a spoil island ("beneficial use island") outside of their current designated disposal area? Rte vs Federal Area

?

Does the GLO have a problem with allowing an operation (dredging, construction activities, drilling etc.) that are clearly in conflict with their recommended resource management codes for state tracts 211, 214, 216, and 217?

Will the levees preclude the formation of beach / shoreline over time? If so, it is recommended that the design of the levee be revised. They say no - water is 3.0-3.5 ft. below beach.

To work w/ experts to design final island.

yes

If future wells are drilled in the Laguna Madre will the advance compensation allow impacts to seagrass beds that could be located within the park's boundaries without requiring any additional compensation?

X

What are the potential long-term impacts on birds and other wildlife that could inhabit the beneficial use island? The well location is relatively close to the proposed beneficial use island, and the proposed channel is directly adjacent to the western boundary of the proposed advanced compensation portion of the island. There could be impacts from noise, boat traffic (human presence), spills from boats and the producing well etc.

○

Will the drilling barge be stabilized and safe in the event of a hurricane?

Built to withstand winds.

Notes:

1.) 3:1 mitigation is probably too low (given past efforts success.

2.)