United States Department of the Interior

BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
Oil Spill Response Division
Alaska Region Unit
3801 Centerpoint Drive, Suite 500
Anchorage, Alaska 99503-5823

Ms. Susan Childs
Shell Offshore, Inc.
3601 C Street, Suite 1000
Anchorage, Alaska 99503

28 March 2012

Dear Ms. Childs:

On 12 March 2012, Shell Offshore, Inc. submitted final amendments to the May 2011, Shell Beaufort Sea Regional Exploration Program Oil Spill Response Plan (OSRP) to the Bureau of Safety and Environmental Enforcement's (BSEE) Oil Spill Response Division (OSRD). You are hereby informed that the OSRP has been found to be in compliance with 30 CFR 254 – Oil Spill Response Requirements for Facilities Located Seaward of the Coastline – and is approved effective 28 March 2012.

Before any drilling operations commence in the Beaufort Sea, you will conduct training in accordance with 30 CFR 254.41, and exercises in accordance with 30 CFR 254.42. You must advise the Chief, OSRD, 30 days prior to scheduled training and exercises to provide an opportunity for staff to witness the activities. Also note that, in accordance with 30 CFR 254.42(g), OSRD may conduct unannounced oil spill drills to test spill response preparedness and knowledge of the approved OSRP. The drills may require mobilization of the spill management team to your pre-designated incident command post for a complex tabletop exercise, deployment of response equipment, or both. OSRD may also conduct unannounced inspections to verify the distribution, operability, and maintenance of response equipment listed in your OSRP. Should inadequacies in the OSRP be identified during equipment inspections or drills, the Chief, OSRD, may require revisions to the approved plan in accordance with 30 CFR 254.30(d) and (e).

Please be advised that the biennial review and update of your OSRP, as required by 30 CFR 254.30(a), must be submitted no later than 20 October 2013. Submit one copy of the findings of the review including any resulting updates to this office for approval. If no modifications are warranted, you must submit written notification that the plan has been reviewed and that there are no changes.

In addition, in accordance with 30 CFR 254.30(b), the OSRP must be revised and submitted to OSRD for approval within 15 days if (1) A change occurs which significantly reduces your response capabilities; (2) A significant change occurs in the worst case discharge scenario or in the type of oil being handled, stored or transported at the facility; (3) There is a change in the name(s) or capabilities of the oil spill removal organizations cited in the plan; or (4) There is a significant change to the Area Contingency Plan(s).

If you have any questions, please contact Ms. Christy Bohl, Senior Analyst, Alaska Region Unit, OSRD, at (907) 334-5309, or Christy.Bohl@bsee.gov.

Sincerely,

David M. Moore
Chief, Oil Spill Response Division
Bureau of Safety and Environmental Enforcement