UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT

NTL No. 2012-N06

Effective Date: August 10, 2012

NATIONAL NOTICE TO LESSEES AND OPERATORS OF FEDERAL OIL AND GAS LEASES AND PIPELINE RIGHT-OF-WAY HOLDERS

<u>Guidance to Owners and Operators of Offshore Facilities Seaward of the Coast Line</u> <u>Concerning Regional Oil Spill Response Plans</u>

This Notice to Lessees and Operators of Federal Oil and Gas Leases and Pipeline Right-of-Way Holders (NTL) supersedes NTL No. 2006-G21, effective October 26, 2006, and NTL No. 2009-P03, effective October 28, 2009, on this subject. This NTL provides clarification, guidance, and information concerning the preparation and submittal of a regional Oil Spill Response Plan (OSRP) for owners and operators of oil handling, storage, or transportation facilities, including pipelines, located seaward of the coast line (facilities).¹ Lessees (State or Federal), designated operators, or pipeline right-of-way holders, as appropriate, (you) are responsible for preparing and submitting the OSRP. The Oil Spill Response Division, within the Bureau of Safety and Environmental Enforcement (BSEE), will review and approve OSRPs that are in compliance with 30 CFR Part 254. Some of the clarifications and encouraged practices in this NTL are based on lessons learned from the *Deepwater Horizon* oil spill response. Adherence to encouraged practices will facilitate BSEE's review of OSRPs but is not required to obtain approval.

Background

In accordance with the Oil Pollution Act,² as implemented by 30 CFR Part 254, BSEE requires owners or operators of facilities to submit OSRPs to BSEE for review and approval. A regional OSRP is defined in § 254.6 as a spill response plan that "covers multiple facilities or leases of an owner or operator, including affiliates, which are located in the same... [BSEE] Region." In accordance with § 254.3(d), the Regional Supervisor may specify how to address the elements of a regional OSRP. This authority has now been delegated to the Oil Spill Response Division (OSRD) Chief.

BSEE encourages you to specifically describe your planned response strategy for each Worst Case Discharge (WCD) scenario included in your regional OSRP. You should consider the following factors when developing a response strategy: location of the potential WCD,

¹ Refer to 30 CFR 254.6 for the definitions of "oil," "facility," and "coast line".

² Pub. L. No. 101-380 §4202, 104 Stat. 484 (1990), codified at 33 U.S.C. 1321(j)(5)(E). The President delegated authority regarding review and approval of OSRPs for offshore facilities to the Secretary of the Interior. Executive Order 12777, 56 FR 54757 (Oct. 22, 1991).

proximity to sensitive resources, nature of the event, estimated discharge volume, oil characteristics, appropriate source control, containment methods, weathering (including natural dispersion), and other resources at risk. The response strategy should also consider the potential for use of surface and subsea dispersants, *in-situ* burning, mechanical recovery, wildlife protection, rescue and rehabilitation strategies and real-time response capability.

OSRP Submission Considerations

BSEE encourages you to submit a regional OSRP that covers all of your facilities in a particular BSEE OCS Region, including Mobile Offshore Drilling Units (MODUs) that will be used to conduct operations on your behalf. BSEE encourages you to incorporate new facilities into your existing regional OSRP in order to meet the requirements in 30 CFR Part 254 for that facility.

For facilities located in State waters seaward of the coast line, you may choose one of three methods to comply with the OSRP requirement described in §§ 254.51, 254.52, and 254.53. You are encouraged to choose the option to modify an existing regional OSRP and include facilities in State offshore waters seaward of the coastline.

OSRP Content Considerations

During BSEE's review of regional OSRPs, OSRD staff will analyze the content to ensure that you demonstrate the ability to respond quickly and effectively whenever oil is discharged from a covered facility as required by 30 CFR Part 254. BSEE OSRD staff will consider the factors described above in evaluating and determining the adequacy of your planned response to a WCD. BSEE will evaluate whether you have demonstrated that sufficient measures are in place to ensure that all spill response efforts are efficient, coordinated, and effective as required by the National Contingency Plan.

The goal for this NTL is to clarify the requirements in 30 CFR Part 254 and ensure national consistency in regional OSRP preparation. This NTL is also designed to encourage you to include in your OSRPs flexible and innovative offshore oil spill response techniques, particularly for a continuous high-rate spill.

To accomplish this, this notice attaches Instructions for Preparing Regional Oil Spill Response Plans (Instructions), which are intended to do the following:

1. Clarify that BSEE will evaluate the description of the OSRP WCD scenario response strategy by carefully weighing all factors addressed in § 254.26 to determine if the strategy is sufficient to contain and recover the discharge to the maximum extent practicable. These factors include the total Effective Daily Recovery Capacity (EDRC), as calculated in accordance with § 254.44(a), and the suitability of equipment within the limits of current technology as required in § 254.26(e). BSEE review of OSRPs is necessarily informed by information obtained during the *Deepwater Horizon* oil spill response, during which the total EDRC calculated for all equipment listed in the OSRP overestimated the amount of oil that could be removed from the water.

BSEE review of OSRPs is not limited to assessing whether the calculated EDRC for the listed mechanical equipment equals the WCD volume. A fully developed response strategy includes a list of all dedicated recovery equipment and the operating characteristics of the systems associated with each skimmer. The plan should demonstrate the ability to contain and recover the WCD to the maximum extent practicable based on the descriptions of the response equipment and other available response elements, functioning together. BSEE encourages you to use new technology and response systems that will increase the effectiveness of mechanical recovery tactics. OSRPs should be prepared by first developing a strategy that would respond to the WCD to the maximum extent practicable, then identifying the resources that would be required to implement the strategy, and finally identifying equipment (including mechanical recovery equipment) and logistics that would meet those resource requirements.

2. Clarify that, when determining whether you have demonstrated that you can respond quickly and effectively whenever oil is discharged, as required by § 254.1(a), BSEE also considers other methodologies and equipment that do not have an associated EDRC calculation. BSEE review will be based on the complete response strategy, including, but not limited to, descriptions of response equipment, personnel, materials, support vessels, transit times and staging locations, as well as the methods and procedures described to contain and recover the discharged oil to the maximum extent practicable. Such methods and procedures could include, but are not limited to:

a. Source control strategies for subsea containment equipment, when appropriate;

b. Response strategies for when and how you plan to use other containment and recovery methodologies (e.g., aerial dispersant application), the effectiveness of which cannot be measured using EDRC calculations, as well as a description of the anticipated effect these strategies will have on discharged oil and the assumptions relied on, including but not limited to, the encounter rate and the effectiveness of these methodologies; and

c. Response strategies for when and how you plan to use subsea dispersants, as well as a discussion of any relevant Federal or State agency approval processes that would apply.

3. Clarify that the qualified individual (QI) identified in the regional OSRP, in accordance with § 254.23(a), must have full authority to implement the deployment of surface and subsea containment resources. BSEE has determined that these actions fall within the definition of "removal actions," which a QI must have authority to implement. The term "remove" is defined at § 254.6 as "containment and cleanup of oil from water and shorelines or the taking of other actions as may be necessary to minimize or mitigate damage to the public health or welfare, including, but not limited to, fish, shellfish, wildlife, public and private property, shorelines, and beaches."

4. Clarify that, in accordance with §§ 254.5(d), 254.23, 254.24, BSEE may evaluate whether you have the ability to access and deploy subsea containment resources to assure compliance

with the requirements of § 254.26(d). As part of these evaluations, BSEE will consider the proposed strategies for the use of all available equipment, technologies, and practices addressing intervention and recovery specified in the OSRP, including, but not limited to, cap and collect, cap and contain, mechanical recovery, *in-situ* burning, dispersants (including subsea), and surveillance (including surveillance and operations at night, if equipment is available (e.g., X-band radar)).

5. Highlight response coordination issues that you should address when demonstrating that your regional OSRP is consistent with the National Contingency Plan and all applicable Area Contingency Plans (ACP), in accordance with § 254.5(b). Specifically:

a. The methods you describe in your OSRP for identifying and prioritizing shoreline resources that require protection under § 254.23(g)(3) and (4) must be consistent with all applicable ACPs (e.g., protection strategies for areas of special economic or environmental importance). Applicable ACPs may cover more than just the area where the spill originates. ACPs may also include shoreline areas that could potentially be impacted by a spill.

b. The Designated Spill Management Team organization and training that you describe in your OSRP, as required by § 254.23(b), must be consistent with the Incident Command System (ICS) structure (as described in Appendix B of the current version of the National Incident Management System (NIMS) under the National Response Framework set forth by Homeland Security Presidential Directive No. 5 (HSPD-5), dated February 28, 2003).

6. Clarify that, if a State requires additional information related to oil spill response, that information may be incorporated into your OSRP in a way that does not reduce the ability to easily use the document or to identify the sections that are required under §§ 254.21 and 254.23.

7. Encourage you to identify sources for supplies and materials that can support a response to an uncontrolled spill lasting longer than 30 days. Although § 254.26(d)(1) only requires that the WCD scenario show plans to support operations for a blowout lasting 30 days, the *Deepwater Horizon* spill response demonstrated that a response may exceed 30 days. Examples of supplies and materials necessary to support a response to a spill that extends more than 30 days could include:

a. Fire boom sources and supplies available that are sufficient to last the duration of a response, taking into account the operational service life of the response equipment; and

b. Dispersant sources and supplies available that are sufficient to last the duration of a response.

8. Encourage you to explore options that overcome response limitations and will improve

the oil spill response capability and effectiveness. Options identified by BSEE include, but are not limited to:

a. Planning to use remote sensing technologies to increase oil detection and improve thickness determination for ascertaining the effectiveness of response strategies;

b. Increasing response operational hours by planning to use remote sensing technologies as a tool for safe night operations; and

c. Increasing spill response operational time for skimmers by reducing transit times to disposal locations and decontamination equipment (e.g., offshore collection and decontamination equipment).

9. Encourage you to specify primary and alternate communications technology and software you may use when coordinating and directing spill-response operations systems and/or providing a common operating picture to all spill management and response personnel, including the Federal On-Scene Coordinator and participating Federal and State government officials.

10. Provide a simplified rating system (see the attached instructions) you may use when listing facilities in the regional OSRP. BSEE may use this information to identify higher risk facilities based on potential discharge volume.

11. Simplify the WCD scenario comparison between the WCD scenarios in EPs, DPPs, and DOCDs with the WCD scenarios in regional OSRPs (see requirements under BOEM at 30 CFR 550.219 and 550.250) by providing you with a table to use as a template for listing the relevant information in the regional OSRP (see attached instructions).

12. Clarify that, when identifying adequate provisions for monitoring the movement of a spill under 254.23(g)(2), you should use the distance of facilities farthest from shore.

The Instructions attached to this NTL provide additional details for you to consider when preparing regional OSRPs.

OSRP Review and Revision Procedures

Once BSEE approves your regional OSRP, you must review it at least every 2 years and submit all resulting modifications to the appropriate BSEE office in accordance with § 254.30(a). If your biennial review does not result in modifications, you must inform the appropriate BSEE office in writing that there are no changes, as required by § 254.30(a). If a change occurs that requires revisions to your regional OSRP, submit the required revisions to the appropriate BSEE office for approval within 15 days of the change, as required by § 254.30(b).

Submit all new and revised regional OSRPs to the following offices for approval:

For the Gulf of Mexico OCS Region:	Bureau of Safety and Environmental Enforcement Oil Spill Response Division Gulf of Mexico OCS Region Branch 1201 Elmwood Park Boulevard New Orleans, Louisiana 70123-2394
For the Pacific OCS Region:	Bureau of Safety and Environmental Enforcement Oil Spill Response Division Pacific Region Unit 770 Paseo Camarillo, 2 nd Floor Camarillo, California 93010-6064
For the Alaska OCS Region:	Bureau of Safety and Environmental Enforcement Oil Spill Response Division Alaska Region Unit 3801 Centerpoint Drive, Suite 500 Anchorage, Alaska 99503-5820

Submit one copy of each regional OSRP and any subsequent revisions. When you submit revisions to your OSRP, list the pages that have been changed.

In order to expedite review, BSEE encourages electronic submission of your regional OSRP. If you do, ensure that all files are in a portable document format (PDF) and include a hotlinked index in the same order as the table of contents in your OSRP. Ensure that the index identifies the location for each section in the OSRP.

Once we have approved your regional OSRP, BSEE encourages you to provide BSEE with an electronic "Public Version" of the plan that proposes to redact material that you understand may be exempt from disclosure under applicable Federal and/or State Freedom of Information and Privacy Laws. This includes, but is not limited to, materials concerning trade secrets, confidential commercial information, and personally identifiable information. BSEE will evaluate your proposed redactions and, as appropriate, will make a copy of the OSRP available for public viewing on the BSEE website at the conclusion of its evaluation.

Guidance Document Statement

The BSEE issues NTLs as guidance documents under the authority of the Administrative Procedure Act, 5 U.S.C. 553 (interpretive rules), to clarify and provide more detail about certain BSEE regulatory requirements and to outline the information you must provide in your various submittals. Under that authority, this NTL sets forth a policy on and an interpretation of regulatory requirements that provides a clear and consistent approach to complying with those requirements.

Paperwork Reduction Act of 1995 Statement

The collection of information referred to in this NTL provides clarification, description, or interpretation of requirements in 30 CFR Part 254 and 30 CFR 250, Subpart B. The Office of Management and Budget (OMB) approved the information collection requirements in this regulation under OMB control numbers 1014-0007 and 1010-0151. This NTL does not impose additional information collection requirements subject to the Paperwork Reduction Act.

Questions

If you have any questions regarding this NTL, please contact the Chief, Oil Spill Response Division, Bureau of Safety and Environmental Enforcement, 381 Elden Street, HE3227 Herndon, Virginia 20191, by writing, or by telephone at (703) 787-1637.

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James A. Watson Director

Attachment

Instructions for Preparing Regional Oil Spill Response Plans

U.S. Department of the Interior Bureau of Safety and Environmental Enforcement Oil Spill Response Division XXX, 2012

General Preparation Instructions

These Instructions provide relevant information for you to consider when preparing your regional Oil Spill Response Plan (OSRP) to assure that you can respond quickly and effectively whenever oil is discharged from your facility using a response strategy that is safe, efficient, and well-coordinated. Your OSRP must also be consistent with the National Response Framework (NRF), the National Incident Management System (NIMS), the National Contingency Plan (NCP), and the appropriate Area Contingency Plans (ACPs).

BSEE encourages you to organize and number the sections of your regional OSRP to coincide with the format outlined in the following pages. This recommended outline is in compliance with 254.21(a) and does not need a cross-reference table under 254.22(d). Please ensure all sections are represented even if not applicable to maintain consistency in numbering. You may also use an alternate format, such as the Integrated Contingency Plan format, if you include a detailed cross-reference table that identifies the location of required sections as required under 254.22(d). It is recommended that you use bookmarks or tabs as your section markers, referenced to the Table of Contents, to identify each section of your OSRP. Numbering every page of your OSRP, including text, maps, tables, and other exhibits including a notation on each page of your OSRP that indicates the date of its latest revision will also add to an easy-to-use format.

If you include additional information in your regional OSRP that is characteristic of, or desired by your organization, but is not addressed by these instructions, include this information in a manner that does not substantially alter the outline.

Whether or not you choose to follow the format in these instructions, we encourage you to address all required items by providing the necessary information in discussions, listings, or by reference in a regional OSRP that is an independent document, free from involved extracts from other data sources. Inclusion of separate planning documents, research results, or oil spill response organizations or cooperative's manuals is not recommended where such documents are relied on as substitutes for the individual organizing and planning necessary for the adequate preparation of your OSRP.

It is recommended that the references you use in your OSRP are readily accessible to your management and field personnel. For each reference, include the title of the publication and the specific sections or page numbers of the referenced document. List each referenced publication in your "Appendix K. Bibliography." It is recommended that you ensure all hyperlinks, references, and citations are up-to-date when you submit an OSRP for review.

ACRONYMS

ACP	Area Contingency Plan
AOCSR	Alaska OCS Region
BOEM	Bureau of Ocean Energy Management
BSEE	Bureau of Safety and Environmental Enforcement
DOCD	Development Operations Coordination Document
DPP	Development and Production Plan
EDRC	Effective Daily Recovery Capacity
EP	Exploration Plan
GOMR	Gulf of Mexico OCS Region
GRP	Geographic Response Plan
IAP	Incident Action Plan
IC	Incident Commander
ICP	Incident Command Post
ICS	Incident Command System
NIMS	National Incident Management System
NCP	National Contingency Plan
NRF	National Response Framework
NRT	National Response Team
NTL	Notice to Lessees and Operators of Federal Oil and Gas Leases and Pipeline Right-of-
	Way Holders
OSRAM	Oil Spill Risk Analysis Model
OCS	Outer Continental Shelf
OSRC	Oil Spill Response Coordinator
OSRD	Oil Spill Response Division
OSRO	Oil Spill Removal Organization
OSRP	Oil Spill Response Plan
POCSR	Pacific OCS Region
QI	Qualified Individual
ROW	Right-of-way
RRT	Regional Response Team

- SMT Spill Management Team
- SROC Spill Response Operations Center
- SROT Spill Response Operating Team

Contents of a Regional OSRP

Section 1. OSRP Quick Guide (Optional)

Provide a concise set of easy-to-follow instructions you will adhere to in the event of an oil spill. Instructions should include all immediate actions and notifications that you are required to take or make. You may use flow charts, check lists, and tables as you deem appropriate.

Section 2. Preface (30 CFR 254.22(b))

a. <u>Table of Contents</u> - Provide a table of contents. The section titles and numbering should be consistent with the following outline:

Section 1. OSRP Quick Guide (Optional)

Section 2. Preface

- a. Table of Contents
- b. Record of Revisions
- c. Cross-Reference Table

Section 3. Introduction

- a. Companies Covered
- b. Purpose and Use
- c. Types of Facilities
- d. Facility Information Statement
- e. Coverage Area
- f. Area Contingency Plans
- g. Contract Certification Statement

Section 4. Organization

- a. Qualified Individual
- b. Spill Management Team
- c. Spill Response Operating Team
- d. Oil Spill Removal Organizations
- e. Support Services
- Section 5. Spill Response Operations Center and Communications
 - a. Spill Response Operations Center
 - b. Communications

- Section 6. Spill Detection and Source Identification and Control
 - a. Spill Detection
 - b. Pipeline Spill Detection and Location
 - c. Source Control
- Section 7. QI, SMT, SROT, and OSRO Notifications
 - a. Reporting Procedures
 - b. Company Contact Information
 - c. SROT Contact Information
 - d. OSRO Contact Information
 - e. Subsea Containment Organization Information
 - f. Internal Spill Reporting Documents
- Section 8. External Notifications
 - a. Reporting Procedures
 - b. External Contact Information
 - c. External Spill Reporting Documents
- Section 9. Available Technical Expertise
- Section 10. Strategic Response Planning
- Section 11. Spill Assessment
 - a. Locating a Spill
 - b. Determining the Size and Volume of a Spill
 - c. Predicting Spill Movement
 - d. Monitoring and Tracking Spill Movement
- Section 12. Resource Identification and Prioritization for Protection
- Section 13. Resource Protection Methods
- Section 14. Mobilization and Deployment Methods
- Section 15. Oil and Oiled Debris Removal Procedures
 - a. Offshore Procedures
 - b. Shallow Water and Shoreline Procedures
 - c. Response Efficiency
- Section 16. Oil and Oiled Debris Disposal Procedures
- Section 17. Wildlife Rescue and Rehabilitation Procedures

Section 18. Dispersant Use Plan

- a. Dispersants Inventory
- b. Toxicity Data
- c. Application Equipment
- d. Application Methods
- e. Conditions for Use
- f. Approval Procedures and Documents
- Section 19. In-Situ Burning Plan
 - a. In-Situ Burning Equipment
 - b. Procedures
 - c. Environmental Effects
 - d. Safety Provisions
 - e. Conditions for Use
 - f. Decision Processes
 - g. Approval Procedures and Documents
- Section 20. Other Strategies (Optional)
 - a. Product Inventory
 - b. Toxicity Data
 - c. Application Equipment
 - d. Application Methods
 - e. Conditions for Use
 - f. Approval Procedures and Documents Forms
- Section 21. Documentation
- Section 22. Prevention Measures for Facilities Located in State Waters

Appendix A. Facility Information

- a. Table 1
- b. Table 2
- c. Table 3
- d. Table 4

Appendix B. Training Information

a. OSRC/IC, SMT, and QI

- b. Other SMT Members
- c. SROT
- d. Location of Records
- Appendix C. Drill Information
- Appendix D. Contractual Agreements
- Appendix E. Response Equipment
 - a. Spill Response Equipment Inventory
 - b. Inspection and Maintenance Programs
- Appendix F. Support Services and Supplies
- Appendix G. ICS Compliant Notification and Reporting
 - a. Internal Spill Reporting
 - b. External Spill Reporting
- Appendix H. Worst Case Discharge Scenarios
 - a. Determination of volume for WCD Scenarios
 - b. Choice of WCD Scenarios to include in your OSRP
 - c. WCD Scenario Discussion
- Appendix I. Subsea Containment Information
 - a. Organizations
 - b. Coordination
 - c. Materials, supplies, and equipment
 - d. Contractual agreements
 - e. Operating team
 - f. Equipment inventory
- Appendix J. Oceanographic and Meteorological Information
 - a. Oceanographic information
 - b. Meteorological information
- Appendix K. Bibliography

b. <u>Record of Revisions</u> - Provide a record of revisions you have made to the regional OSRP. Indicate when each revision was made, the section and pages affected, and the type of revision, i.e., biennial update, amendment (a change to a regional OSRP pending approval), or modification (a change to an approved regional OSRP). c. <u>Cross-Reference Table</u> - Provide a cross-reference table that identifies the location of the required sections if you use an alternative format. Present the cross-reference table in the same order as the table of contents outlined in paragraph "a" above.

Section 3. Introduction (30 CFR 254.22)

a. <u>Companies Covered</u> - List the corporate name and BSEE or State company identification number for all companies covered by your OSRP. If the OSRP is being submitted by a parent company, or if multiple companies are listed, describe the corporate relationship among the companies.

b. <u>Purpose and Use</u> - Provide a paragraph describing the purpose of your regional OSRP and, if appropriate, brief instructions for its use during an oil spill response.

c. <u>Types of Facilities</u> – Under § 254.3, your OSRP may be for a single lease or facility or a group of leases or facilities. Indicate the types of facilities (e.g., MODUs that will be used to conduct proposed exploration drilling, OCS facilities, OCS ROW pipelines, State facilities, State ROW pipelines) that are covered by your regional OSRP. The following table is an example of a suggested format for presenting this information.

Type of Facility	Yes	No
MODUs that will be used to conduct		
proposed exploration drilling.		
OCS oil handling, storage, or		
transportation facilities.		
OCS ROW pipelines.		
State oil handling, storage, or		
transportation facilities.		
State pipelines.		

d. <u>Facility Information Statement</u> - State that your "Appendix A. Facility Information" includes the listing of all of your facilities covered by your regional OSRP (see Appendix A for details).

e. <u>Coverage Area</u> - Describe the geographic boundaries of the area that is covered by the regional OSRP. Include a list of your leases (including Area and Block No.) that are in the covered area.

f. <u>Area Contingency Plans</u> - Identify the appropriate ACPs that you will use to respond to a discharge from the facilities covered by your regional OSRP. Include ACP information you will use for wildlife and shoreline protection measures, if necessary, even if the ACP you will rely on is not within the same U.S. Coast Guard Captain of the Port Zone as your facility. For example, ACPs contain important information on protection strategies for areas of special economic or environmental importance.

g. <u>Contract Certification Statement</u> – Under § 254.25, your OSRP must include an appendix for contractual agreements. In the "Introduction," certify that contracts/agreements are in effect that will provide immediate access to appropriate spill response equipment and personnel. Provide the name of your primary spill response equipment provider(s) required in § 254.24(a).

Section 4. Organization (30 CFR 254.23(a)-(c))

a. <u>Qualified Individual</u> - Provide the name, position, and describe the duties and responsibilities of your designated, trained, QI who has full authority to obligate funds and implement response actions. Authority for removal actions should include those necessary to access and deploy surface and subsea containment resources when applicable, and to immediately notify appropriate Federal officials and response organizations. Express this delegation of authority to the QI clearly in this section. Make reference to your "Appendix B. Training Information" for a description of the training the QI has received (see Appendix B on what to include).

b. Spill Management Team

i. In accordance with HSPD-5, dated February 28, 2003, and under the NRF you should structure your SMT using the NIMS format (e.g., Incident Command, Logistics, Operations, Planning, Finance). Within this structure, include members who will direct and coordinate source control activities during a spill response. Provide the names and describe the duties, responsibilities, and authorities of each SMT member. Designate a sufficient number of members who are readily available to ensure the duties of each individual position on the SMT can be fulfilled on a 24-hour per day basis.

ii. Include a designated trained OSRC/IC and alternate(s) who have been delegated the responsibility and authority to direct and coordinate response and source control operations. The QI and the OSRC/IC may be the same individual.

iii. For any members of the SMT who are not employees of your organization, it is recommended that you briefly discuss the terms of the contracts/agreements you have with them if this detail is not include in your "Appendix D. Contractual Agreements" (see Appendix D on what to include).

iv. Identify the training received by the SMT members responsible for spill management and source control decision making and coordination by making reference to your "Appendix B. Training Information."

c. <u>Spill Response Operating Team</u> - Describe the makeup of your SROT. This team consists of trained, prepared, and available (on a 24-hour per day basis) personnel and their field supervisors who will deploy and operate oil spill response equipment and materials. Identify the organizations that will provide personnel for this team and include the number and types of personnel available from each. It is recommended that you briefly discuss the terms of the contracts/agreements you have with them and make reference to applicable "Appendix D. Contractual Agreements." Describe the training your SROT members have received in your "Appendix B. Training Information".

d. Oil Spill Removal Organizations

Identify and describe the OSRO that will provide you with oil spill response materials and supplies, equipment, and dedicated vessels in the event you have an oil spill. A complete description should demonstrate that the supplied equipment, materials, and vessels are of sufficient quantity and capacity and are suitable within the limits of current technology to respond effectively to oil spills within the range of anticipated environmental conditions at the facilities and leases covered by your regional OSRP. Make reference to your "Appendix E. Response Equipment" for a current inventory of supplied equipment and materials (see Appendix E on what to include). It is recommended that you briefly discuss the terms of the contracts/agreements you have with OSROs and make reference to applicable "Appendix D. Contractual Agreements."

e. Support Services

Briefly describe the support services you may need in the event you have an oil spill. Make reference to your "Appendix F. Support Services and Supplies" for a directory of these services (see Appendix F on what to include).

Section 5. Spill Response Operations Center and Communications (30 CFR 254.23(d))

a. <u>Spill Response Operations Center</u> - Discuss the features and capabilities of your prearranged spill response operations center/incident command post (SROC/ICP). Include the street address and a map pinpointing the center's location.

b. <u>Communications</u> - Describe the primary and alternate communication systems you will use to direct and coordinate your response to an oil spill. Include the telephone number(s) of the SROC/ICP, other telephone numbers, the fax numbers, and primary and secondary radio frequencies you will use.

Section 6. Spill Detection and Source Identification and Control (30 CFR 254.23(f) and (g))

a. <u>Spill Detection</u> - Describe the general procedures that your organization has developed and instituted to ensure that oil spills are detected as soon as possible after they occur. We encourage you to consider using available new technology, including remote sensing equipment, when practicable.

b. <u>Pipeline Spill Detection and Location</u> - If your regional OSRP covers pipelines, briefly describe the procedures you will use to verify whether pipeline integrity has been breached and how you will determine the exact location of the leak.

c. <u>Source Control</u> - Briefly describe the general procedures that have been developed and instituted by your organization to ensure that the source of a discharge is controlled as soon as possible after a spill occurs. If applicable, briefly describe the steps you have taken, or will take, to demonstrate adequate ability to access and deploy surface and subsea containment resources when applicable. Make reference to your "Appendix I. Subsea Containment Information" for additional information (see Appendix I on what to include).

Section 7. QI, SMT, SROT, and OSRO Notifications (30 CFR 254.23(g)(1))

a. <u>Reporting Procedures</u> - Describe the procedures by which an oil spill is reported from the field to responsible company officials. Include a description of the procedures you will use to mobilize your QI, SMT, and SROT. Where appropriate, make sure that the procedures show spill notification and response levels for differing spill sizes.

b. <u>Company Contact Information</u> - List the names of the following individuals and include the work address, work and off-duty telephone numbers, fax number, and email address(es) (as appropriate) for each.

- i. QI and alternate(s)
- ii. OSRC/IC and alternate(s)
- iii. SMT members and alternates
- iv. Company SROT members

c. <u>SROT Contact Information</u> - List the firms that you will contact to provide personnel for your SROT and include each firm's address, work and off-duty telephone numbers, fax number, and email address(es) (as appropriate).

d. <u>OSRO Contact Information</u> - List the names, telephone numbers, addresses, and a brief description of the primary organizations that provide you with oil spill response materials and supplies, equipment, and trajectory simulation services in the event of an oil spill. Make reference to your "Appendix F. Support Services and Supplies" for a directory of additional personnel, materials and supplies, equipment, and services (see Appendix F on what to include).

e. <u>Subsea Containment Organization Information</u> - List the name(s), telephone number(s), address(es), and a brief description of the primary organization(s) that provide you with subsea containment equipment, materials and supplies, and support services in the event they are necessary to respond to an oil spill. Make reference to your "Appendix I. Subsea Containment Information" for a directory of additional personnel, materials and supplies, equipment, and services (see Appendix I on what to include).

f. <u>Internal Spill Reporting Documents</u> - Include a reference to your OSRP, "Appendix G. ICS Compliant Notification and Reporting Documents". **Section 8. External Notifications (30 CFR 254.23(g)(1))**

a. <u>Reporting Procedures</u> - Describe the procedures you will use to report an oil spill to the Federal, State, and local regulatory agencies you must contact. As applicable, indicate time-frames within which the regulations require you to make verbal notifications and submit written reports.

b. External Contact Information - Provide the following contact information:

i. The telephone number of the U.S. Coast Guard National Response Center (see § 254.46(a) for requirements).

ii. The telephone numbers, emergency cell phone numbers, and addresses of the BSEE offices that you will notify when you have an oil spill of one barrel or more (see § 254.46(b) for requirements).

c. <u>External Spill Reporting Documents</u> - Include a reference to your company's "Appendix G. ICS Compliant Notification and Reporting Documents" for copies of spill incident reporting documents. Make sure these documents are consistent with those included in applicable ACPs (see Appendix G).

Section 9. Available Technical Expertise (30 CFR 254.23(g)(1)(ii)(B))

Provide a current list of the names, telephone numbers, and addresses of Federal, State, and local agencies and other entities that you may consult to obtain site-specific environmental information when you have an oil spill. These may include the U.S. Fish and Wildlife Service, NOAA National Marine Fisheries Service, academia, consultants, and various refuge, sanctuaries, and park managers.

Section 10. Strategic Response Planning (30 CFR 254.23(g)(3))

Discuss the process you will use to determine your response priorities and strategies. In this discussion, indicate how you will establish initial objectives and develop subsequent incident action plans. As part of this discussion, include procedures to prioritize beaches, waterfowl, other marine and shoreline resources, and areas of special economic or environmental importance. Also, discuss how you will integrate data from an ongoing response into an overall plan (i.e., a common operating picture) to maximize use of available response resources.

Section 11. Spill Assessment (30 CFR 254.23(g)(2))

In your OSRP, when practicable, BSEE encourages you to consider including remote sensing technology for the following.

a. <u>Locating a Spill</u> - Describe the methods you will use to locate an oil spill. Since oil spills in the OCS are beyond the plain sight of the shore, we will be looking for information in your OSRP that details how you will comply with this section of the regulations. An example would be your ability to deploy aircraft capable of observing a spill from the facility covered by your regional OSRP which is farthest from the shoreline.

b. <u>Determining the Size and Volume of a Spill</u> - BSEE will look for a description of the methods you will use to determine an oil spill's size and volume. Include charts or other aids (e.g., remote sensing equipment) you use in this process. Also describe any methods or equipment you will use to estimate true and/or relative oil thickness on the water.

c. <u>Predicting Spill Movement</u> - Discuss how you will monitor and predict the movement of an oil spill. If you use tools such as real-time oil spill trajectory simulations, it is recommended that you describe the input variables required (e.g., wind, current, sea state, spill size), the means

by which this information will be obtained, and the communications network for the transmission of the information. Include copies of your company's data collection documents pertaining to trajectory information requests.

If you have leases or facilities in the Flower Garden Banks Oil Spill Planning Area (see explanation in Appendix H), make sure that you have provisions for obtaining real-time on-site meteorological information to use in your trajectory simulations in the event of a spill. Consider obtaining this meteorological information by joining and using an established and recognized data gathering system (such as that developed by the "Flower Garden Banks Oil Spill Planning Area Joint Industry Project" or equivalent system) or by installing the necessary equipment at your facility.

d. <u>Monitoring and Tracking Spill Movement</u> - Discuss the methods and techniques you will use to track and monitor an oil spill's movement. Also explain any provisions you have made to use remote thickness detection systems (such as integrated X-band radar/IR systems) to track the slick and increase the encounter rate. Also describe other remote sensing systems and techniques that you may use, including satellite, side-looking airborne radar, aerial photographs, radiometers, fluorosensors, and others not specifically stated.

Section 12. Resource Identification and Prioritization for Protection (30 CFR 254.23(g)(3))

Discuss the process you will use during a response to identify beaches, waterfowl, other marine and shoreline resources, and areas of special economic or environmental importance that could be impacted by an oil spill. You should consider including sources for maps, databases, or other resources you will use in carrying out this process during a response. Ensure that your process includes coordination with appropriate government agencies (see Section 9), and that these resources you identify during the response are compatible with the applicable ACPs.

Section 13. Resource Protection Methods (30 CFR 254.23(g)(4))

Briefly summarize the methods you will use to protect beaches, waterfowl and other wildlife, other marine and shoreline resources, and areas of special economic or environmental importance. Describe the conditions under which the identified methods would be applicable (e.g., sea condition, spill size, beach environment, oil type). Ensure that your methods are compatible with those described in the appropriate ACP(s).

Section 14. Mobilization and Deployment Methods (30 CFR 254.23(g)(5))

Discuss your methods to ensure that containment and recovery equipment, as well as response personnel, are mobilized and deployed at the spill site and projected impact locations. The ability to comply with this requirement in the shortest possible time will help maximize containment and recovery. This discussion should include details about your selection of appropriate vessels of opportunity, equipment base locations, transportation methods and routes, and other logistical support. Discuss how you will use vessel tracking systems for real time command and control of vessels and fleets during the response.

Section 15. Oil and Oiled Debris Removal Procedures (30 CFR 254.23(g)(5) and (g)(7))

a. <u>Offshore Procedures</u> - Discuss your procedures to contain and remove oil and oiled debris from offshore waters. Include a description of removal alternatives and the advantages and disadvantages associated with each.

b. <u>Shallow Water and Shoreline Procedures</u> - Discuss your procedures to remove oil and oiled debris from shallow waters and along shorelines. Include a description of removal alternatives for various shoreline habitats and the advantages and disadvantages associated with each.

c. <u>Response Efficiency</u> - Describe the methods and equipment necessary to maximize the effectiveness and efficiency of the response equipment used to recover the discharge on the water's surface. The discussion should include methods to increase encounter rate, the use of vessel tracking, and the use of remote sensing technologies.

Ensure that the equipment, materials, and vessels described above are of sufficient quantity and capacity and are suitable within the limits of current technology to respond effectively within the range of anticipated environmental conditions. Use standardized, defined terms to describe the range of environmental conditions anticipated and the capabilities of response equipment. Examples of acceptable terms include those defined in American Society for Testing of Materials (ASTM) publication F625–94, *Standard Practice for Describing Environmental Conditions Relevant to Spill Control Systems for Use on Water*, and ASTM F818–93, *Standard Definitions Relating to Spill Response Barriers*.

Section 16. Oil and Oiled Debris Disposal Procedures (30 CFR 254.23(g)(6) and (g)(8))

Discuss your procedures to store, transfer, and dispose of recovered oil and oil-contaminated materials and to ensure that all disposals are in accordance with Federal, State, and local requirements. The discussion of your disposal procedures should also include your procedures for obtaining authorization to decant water collected during removal operations. Discuss your methods to ensure that devices for the storage of recovered oil are sufficient to allow containment and recovery operations to continue without interruption. It would aid BSEE's analysis of your OSRP if you included a discussion of your methods to increase the efficiency and effectiveness of offloading and storage of oily water and material collected offshore in order to minimize the amount of time required for offloading skimming vessels. If you include a description of the various equipment, methods, and contractors that would be employed for the offshore and onshore transport of such materials and a listing of potential disposal sites, including their locations and the types of materials they will accept, it would help us understand how you intend to comply with the regulatory requirements of this section.

Section 17. Wildlife Rescue and Rehabilitation Procedures (30 CFR 254.23(g)(7))

Discuss your procedures to rehabilitate waterfowl and other wildlife that have become oiled. Include in your discussion how you will obtain authorization to initiate capturing and cleaning of oiled wildlife. A thorough discussion of your wildlife rehabilitation procedures should include a plan identifying the personnel, equipment, and supplies that will be used to establish and operate a rehabilitation station and the source of those personnel, equipment, and supplies.

Section 18. Dispersant Use Plan (30 CFR 254.23(g)(9) and 254.27)

Provide your dispersant use plan. Ensure that it is consistent with the NCP and the appropriate ACP(s). Ensure that all dispersants cited in your plan are included on the NCP Product Schedule. Include the following information in your dispersant use plan:

a. <u>Dispersants Inventory</u> - An inventory showing type, quantity, and location of the dispersants that you might use on an oil spill. Identify the quantities of dispersants that are specifically available for subsea use in your inventory. BSEE encourages you to describe your maximum expected daily dispersant consumption rate. BSEE also encourages you to discuss procedures for maintaining dispersant inventory necessary to support a response to a spill that extends more than 30 days.

b. <u>Toxicity Data</u> - A summary of toxicity data for these products.

c. <u>Application Equipment</u> - An inventory that includes a description and a location of dispersant application equipment and estimate of the time to commence application after approval is obtained.

d. <u>Application Methods</u> - A discussion of the application procedures, including dispersant application rates. Include information about the use of subsea and vessel dispersant application as a method to reduce exposure to volatile organic compounds (VOC) and allow vertical access during well control and containment activities.

e. <u>Conditions for Use</u> - A discussion of the conditions under which you may request dispersant use. Include your considerations of dispersant effectiveness over time.

f. <u>Approval Procedures and Documents</u> - An outline of the procedures you will follow in obtaining approval for product use that aligns with National Response Team (NRT) or appropriate Regional Response Team (RRT) guidance. Include copies of the applicable up-to-date RRT reporting document that you will use in the approval process. If applicable, include guidance you plan to use during a response to communicate response actions from the NRT or appropriate RRT on the use of subsea dispersants. For example, include the process you will use during a response to request approval and any required monitoring protocols you plan to implement concurrently with the subsea dispersant application.

The following are examples of what you should include in your dispersant use plan:

- i. The dispersants listed in your inventory that are specifically for subsea use.
- ii. A discussion of your assumptions on dispersant effectiveness over time.

iii. Your planned dispersant application rates.

iv. A discussion of any preapproval process for product use. Include copies of the applicable up-to-date RRT documents for the approval process.

v. If applicable, describe your understanding and applicability of guidance from the NRT or appropriate RRT on the use of subsea dispersants, including the process for approval, and any required monitoring protocols to be implemented concurrently with subsea dispersant application. Include information about the use of subsea and vessel dispersant application as a method to reduce exposure to VOCs and allow vertical access during well control and containment activities.

Section 19. In-Situ Burning Plan (30 CFR 254.23(g)(9) and 30 CFR 254.28)

Provide your *in-situ* burning plan. Ensure that your *in-situ* burning plan is consistent with any guidance from the NCP and the appropriate ACP(s). Include the following information in your *in-situ* burning plan:

a. <u>In-Situ Burn Equipment</u> - A description of the *in-situ* burn equipment, including its availability, location, and owner. BSEE encourages you to describe the operational service life of this burn equipment. BSEE also encourages you to discuss procedures for maintaining *in-situ* burn equipment necessary to support a response to a spill that extends more than 30 days.

b. <u>Procedures</u> - A discussion of your *in-situ* burning procedures, including provisions for igniting an oil spill.

c. <u>Environmental Effects</u> - A discussion of environmental effects of an *in-situ* burn.

d. <u>Safety Provisions</u> - Your guidelines for ensuring personnel and property safety during an *in-situ* burn.

e. <u>Conditions for Use</u> - A discussion of the circumstances in which *in-situ* burning may be appropriate.

f. <u>Decision Processes</u> - Your guidelines for making the decision to ignite.

g. <u>Approval Procedures and Documents</u> - An outline of the procedures you will follow to obtain approval for an *in-situ* burn. It is recommended that you include a discussion of any preapproval process and copies of the applicable up-to-date RRT documents that you will use in the approval process.

Section 20. Other Strategies (30 CFR 254.23(g))

In the event you choose to plan for the use of other response procedures that are not discussed elsewhere in these instructions (e.g., the use of collecting agents, herders, bioremediation, etc.),

you should provide information about the response strategy and how it aligns with the applicable NCP requirements and ACP(s). The following information will help BSEE ensure that alternative strategies comply with required regulatory procedures:

a. <u>Product Inventory</u> - An inventory showing type, quantity, and location of the products that you might use on an oil spill.

b. <u>Toxicity Data</u> - A summary of toxicity data for these products.

c. <u>Application Equipment</u> - An inventory that includes a description and a location of product application equipment.

d. <u>Application Methods</u> - A discussion of the application procedures including, if applicable, information on rates of application.

e. <u>Conditions for Use</u> - A discussion of the conditions under which product use may be requested.

f. <u>Approval Procedures and Documents Forms</u> - An outline of the procedures you will follow in obtaining approval for product use, including discussion of any pre-approval process. Include copies of the applicable up-to-date documents that you will use in the approval process.

Section 21. Documentation (30 CFR 254.46(b)(2))

You are encouraged to describe your procedures for documenting the response as required in § 254.46(b)(2). The SMT should be prepared to implement these procedures using NIMS ICS. BSEE recommends that these procedures include the following:

- a. Your procedures to record your discussions and actions taken during the response; and
- b. Your procedures to retain and preserve copies of your internal reporting documents including your source for obtaining them.

Section 22. Prevention Measures for Facilities Located in State Waters (30 CFR 254.54)

If your OSRP covers facilities in State waters:

a. Describe the steps you are taking to prevent oil spills or to mitigate the substantial threat of such a discharge.

b. Identify all State or Federal safety or pollution prevention requirements that apply to the prevention of oil spills from the facilities and demonstrate your compliance with these requirements.

c. Describe the industry safety and pollution prevention standards the facilities meet.

Guidance for Appendices

Appendix A. Facility Information (30 CFR 254.22(a) and 30 CFR 254.23(e))

As noted in Section 3, you should list all of the facilities covered by your regional OSRP in Appendix A. Also, provide one or more maps at an appropriate scale depicting the relationship of the listed facilities to the shoreline. The following information should be adequate to describe and identify your facility:

Oil Handling, Storage, and Transportation Facilities

- 1. Provide the 2-letter BSEE area designation of the facility (e.g., MP, PS, WC).
- 2. Provide the OCS or State Block No. of the facility (e.g., 25, 251, A-375).
- 3. Provide the OCS or State Lease No. of the facility (e.g., 091, 0425, G 10112).
- 4. Provide the facility designation (e.g., No. 2, A, JA).
- 5. Provide the 5-digit BSEE complex identification number or State-assigned identification number for the facility.
- 6. Provide the water depth at the site of the facility in feet.
- 7. Provide the latitude and longitude of the facility in degrees and decimal minutes (e.g.,

28°25.35'N, 90°09.08'W).

- 8. Provide the distance from the facility to the nearest shoreline in miles.
- 9. Provide the API Gravity of the densest oil being produced or stored at the facility.

Pipelines

- 1. Provide the 2-letter BSEE area designation and the OCS Block No. of the originating point of the pipeline (e.g., WC 425, HI A-375).
- 2. Provide the latitude and longitude of the originating point of the pipeline in degrees and decimal minutes (e.g., 28°25.35'N, 90°09.08'W).
- 3. Provide the 2-letter BSEE area designation and the OCS or State Block No. of the terminus of the pipeline (e.g., WC 425, HI A-375).
- 4. Provide the latitude and longitude of the terminus of the pipeline in degrees and decimal minutes (e.g., 28°25.35'N, 90°09.08'W).

5. Indicate whether the pipeline either terminates or originates at the Federal/State boundary (i.e., yes, no).

6. Provide the 5-digit BSEE Segment No. or State-assigned identification number, as applicable, of the pipeline (e.g., 00006, 01234, 11456).

7. Provide the OCS ROW No. or the State-assigned ROW No., as applicable, of the pipeline (e.g., 092, 0436, G 10992).

- 8. Provide the length of the pipeline in feet.
- 9. Provide the internal diameter of the pipeline in inches.
- 10. Provide the API Gravity of the oil being transported by the pipeline.
- 11. Indicate whether the pipeline is monitored by a leak detection system (i.e., yes, no).
- 12. Provide the highest measured oil flow rate over the preceding 12-month period (new
- facilities use the predicted oil flow rate) in barrels of oil per day of the pipeline.

13. Provide the distance to shore of the point of the pipeline that is nearest to the shoreline in miles.

14. Indicate whether the pipeline has an associated appurtenance platform(s) (i.e., yes, no).

The following tables are examples of a suggested format for presenting this information.

a. <u>Table 1</u> - List your existing OCS oil handling, storage, or transportation facilities alphabetically by area designation and numerically by OCS Block for each company or subsidiary covered by the OSRP.

b. <u>Table 2</u> - List your existing OCS ROW pipelines by departing area/block for each company or subsidiary covered by the OSRP.

c. <u>Table 3</u> - List your existing oil handling, storage, or transportation facilities in State waters seaward of the coast line alphabetically by area designation and numerically by block for each company or subsidiary covered by the OSRP.

d. <u>Table 4</u> - List your existing State pipelines in State waters seaward of the coast line by departing area/block for each company or subsidiary covered by the OSRP.

Note that Tables 1 and 3 include determinations of a potential WCD category. To determine the appropriate category, estimate the facility daily worst-case discharge volume, select the appropriate category from below, and enter the category in column 10. Estimate volumes using the criteria in § 254.47. If your daily WCD volume is in excess of 10,000 barrels (Category C or D), complete Columns 11, 12, and 13 of Tables 1 and 3 for that facility.

Category	Volume (Barrels/Day)
А	Less than 1,000
В	1,000 - 10,000
С	10,001 - 50,000
D	More than 50,000

FACILITY INFORMATION – OIL HANDLING, STORAGE, OR TRANSPORTATION FACILITIES IN OCS WATERS

1	2	3	4	5	6	7	8	9	10	11	12	13
AREA	BLOC K	LEASE	FAC NAME	FAC ID	WATER DEPTH	LAT LONG	DIST SHORE	API GRAV	CATEGORY	HIGH WELL	ALL STOR	THRU VOL

- 1. Provide the 2-letter BSEE area designation of the facility (e.g., MP, PS, WC).
- 2. Provide the OCS Block No. of the facility (e.g., 25, 251, A-375).
- 3. Provide the OCS Lease No. of the facility (e.g., 091, 0425, G 10112).
- 4. Provide the facility designation (e.g., No. 2, A, JA).
- 5. Provide the 5-digit BSEE complex identification number for the facility.
- 6. Provide the water depth at the site of the facility in feet.
- 7. Provide the latitude and longitude of the facility in degrees and decimal minutes (e.g.,

28°25.35'N, 90°09.08'W).

- 8. Provide the distance from the facility to the nearest shoreline in miles.
- 9. Provide the API Gravity of the densest oil being produced or stored at the facility.
- 10. Enter the appropriate worst case discharge volume rating (e.g., A, B, C, or D).
- 11. If "Category" in column 10 is "C" or "D", if applicable, provide in barrels the daily production volume from an uncontrolled blowout of the highest capacity well associated with the facility.

12. If "Category" in column 10 is "C" or "D", if applicable, provide the total maximum capacity in barrels of all oil storage tanks and flow lines on the facility including oil used for operations or other purposes (e.g., fuel oil (including diesel fuel), corrosion inhibitors). Flow line volume may be estimated.

13. If "Category" in column 10 is "C" or "D", if applicable, provide the throughput volume in barrels of oil per day of the lease term pipelines that depart the facility.

7 9 4 5 6 8 10 11 12 13 14 2 3 FROM LAT. ТО F/S SEG ROW LENGTH SIZE API. THRU. DIST. APPURT. LAT. LEAK LONG LONG. BOUND. GRAV. DETECT. VOL SHORE PLATFOR NO. NO SYSTEM М

FACILITY INFORMATION - ROW PIPELINES IN OCS WATERS

- 1. Provide the 2-letter BSEE area designation and the OCS Block No. of the originating point of the ROW pipeline (e.g., WC 425, HI A-375).
- 2. Provide the latitude and longitude of the originating point of the ROW pipeline in degrees and decimal minutes (e.g., 28°25.35'N, 90°09.08'W).
- 3. Provide the 2-letter BSEE area designation and the OCS Block No. of the terminus of the ROW pipeline (e.g., WC 425, HI A-375).
- 4. Provide the latitude and longitude of the terminus of the ROW pipeline in degrees and decimal minutes (e.g., 28°25.35'N, 90°09.08'W).
- 5. Indicate whether the ROW pipeline either terminates or originates at the Federal/State boundary (i.e., yes, no).
- 6. Provide the 5-digit BSEE Segment No. of the ROW pipeline (e.g., 00006, 01234, 11456).
- 7. Provide the OCS ROW No. of the ROW pipeline (e.g., 092, 0436, G 10992).
- 8. Provide the length of the ROW pipeline in feet.
- 9. Provide the internal diameter of the ROW pipeline in inches.
- 10. Provide the API Gravity of the oil being transported by the ROW pipeline.
- 11. Indicate whether the ROW pipeline is monitored by a leak detection system (i.e., yes, no).
- 12. Provide the highest measured oil flow rate over the preceding 12-month period (new
- facilities use the predicted oil flow rate) in barrels of oil per day of the ROW pipeline.
- 13. Provide the distance to shore of the point of the ROW pipeline that is nearest to the shoreline in miles.

14. Indicate whether the ROW pipeline has an associated appurtenance platform(s) (i.e., yes, no).

FACILITY INFORMATION - OIL HANDLING, STORAGE, OR TRANSPORTATION FACILITIES IN STATE WATERS SEAWARD OF THE COAST LINE

1	2	3	4	5	6	7	8	9	10	11	12	13
AREA	BLOCK	LEASE	FAC. NAME	FAC. ID	WATER DEPTH	LAT. LONG	DIST. SHORE	API. GRAV.	CATE- GORY	HIGH. WELL	ALL STOR.	THRU. VOL.

- 1. Provide the 2-letter BSEE area designation of the State facility (e.g., MP, PS, WC).
- 2. Provide the State Block No. of the State facility.
- 3. Provide the State Lease No. of the State facility.
- 4. Provide the State facility designation.
- 5. Provide the State-assigned identification number for the facility.
- 6. Provide the water depth at the site of the State facility in feet.

7. Provide the latitude and longitude of the State facility in degrees and decimal minutes (e.g., 28°25.35'N, 90°09.08'W).

- 8. Provide the distance from the facility to the nearest shoreline in miles.
- 9. Provide the API Gravity of the densest oil being produced or stored at the State facility.
- 10. Enter the appropriate worst case discharge volume rating (e.g., A, B, C, or D).
- 11. If "Category" in column 10 is "C" or "D", if applicable, provide in barrels the daily production volume from an uncontrolled blowout of the highest capacity well associated with the facility.
- 12. If "Category" in column 10 is "C" or "D", if applicable, provide the total maximum capacity in barrels of all oil storage tanks and flow lines on the facility including oil used for operations or other purposes (e.g., fuel oil (including diesel fuel), corrosion inhibitors). Flow line volume may be estimated.
- 13. If "Category" in column 10 is "C" or "D", if applicable, provide the throughput volume in barrels of oil per day of the lease term pipelines that depart the facility.

FACILITY INFORMATION - PIPELINES IN STATE WATERS SEAWARD OF THE COAST LINE

1	2	3	4	5	6	7	8	9	10	11	12	13	14
FRO M	LAT/ LONG	ТО	LAT. LONG.	F/S BOUND.	ID. NO.	ROW NO.	LENGTH	SIZE	API. GRAV.	LEAK DETECT. SYSTEM	THRU VOL.	DIST. SHORE	APPURT. PLATFORM

- 1. Provide the 2-letter BSEE area designation and the Block No. of the originating point of the State pipeline (e.g., SP 2, EI 21).
- 2. Provide the latitude and longitude of the originating point of the State pipeline in degrees and decimal minutes (e.g., 28°25.35'N, 90°09.08'W).
- 3. Provide the 2-letter BSEE area designation and the Block No. of the terminus of the State ROW pipeline or the point at which the pipeline crosses the coast line (e.g., HI 96, SS 10).
- 4. Provide the latitude and longitude of the terminus of the State pipeline (if in State waters) or the point at which the pipeline crosses the coast line in degrees and decimal minutes (e.g., 28°25.35'N, 90°09.08'W).
- 5. Indicate whether the pipeline either terminates or originates at the Federal/State boundary (i.e., yes, no).
- 6. Provide the State-assigned identification number of the State pipeline, if assigned.
- 7. Provide the State-assigned ROW No. of the State pipeline if applicable.
- 8. Provide the length of the State pipeline in feet.
- 9. Provide the internal diameter of the State pipeline in inches.
- 10. Provide the API Gravity of the oil being transported by the State pipeline.
- 11. Indicate whether the State pipeline is monitored by a leak detection system (i.e., yes, no).
- 12. Provide the throughput volume in barrels of oil per day of the State pipeline.
- 13. Provide the distance to shore of the point of the pipeline that is nearest to the shoreline in miles.
- 14. Indicate whether the pipeline has an associated appurtenance platform(s) (i.e., yes, no).

Appendix B. Training Information (30 CFR 254.29)

a. <u>QI, OSRC/IC, and SMT</u> - Identify and include the date of the most recent annual classroom training taken by the QI, OSRC/IC, Operations Section Chief, and Planning Section Chief, members of your SMT responsible for spill management decision making, and alternates. The training requirements for these individuals are specified in § 254.41(b). This training must include instruction on all responsibilities the SMT may have, including the responsibility to implement subsea well control and containment systems. Also, ensure that the QI, IC, and SMT are proficient in ICS (as described in Appendix B of the current version of NIMS under the National Response Framework in accordance with Homeland Security Presidential Directive No. 5 (HSPD-5) dated February 28, 2003)).

If the subsea well control and containment training was conducted separately from the annual SMT training, provide the dates of the most recent training, or reference existing documents with this information.

b. <u>Other SMT Members</u> - Describe the types of training given to the other members of your SMT.

c. <u>SROT</u> - Describe the training given to the members of your SROT. The training requirements for your SROT are specified in 254.41(a).

d. <u>Location of Records</u> - Identify the location(s) where you keep course completion certificates or attendance records for all required training.

Appendix C. Drill Information (30 CFR 254.29)

Describe in detail your plans for satisfying the exercise requirements of § 254.42 for your OSRP. Identify the location where you keep the records of these exercises. Conduct the notification exercise required by § 250.42(b)(3) for each facility that is manned on a 24-hour basis in a timely manner after you acquire or install the facility or after you become the designated lease operator for the facility (no specific time period is associated with this requirement, but BSEE encourages you to conduct the exercise promptly, e.g., within 15 days from installation or operator designation.)

Appendix D. Contractual Agreements (30 CFR 254.25)

Furnish proof of any contracts or membership agreements with any organizations, OSROs, cooperatives, SROT organizations, and spill management team members who are not your employees that will provide the equipment, personnel, materials, and support vessels you will use to contain and recover your WCD, and protect the nearshore/shoreline environment (e.g. wildlife rehabilitation organizations). To provide this proof, include copies of the contracts or membership agreements or certify that contracts or membership agreements are in effect. For each contract or membership agreement, include provisions for ensuring the availability of the personnel and/or equipment on a 24-hour per-day basis.

If you choose to provide a copy of a contract or membership agreement, ensure that the document clearly identifies the parties and the term and contains signatures of authorized company representatives. If applicable, you should ensure your contract or membership agreement also specifically states that contracted SMT members have been delegated the commensurate authority to fulfill their assigned SMT responsibilities.

If you choose to certify that contracts or membership agreements are in effect, and you only have one such contract or membership agreement in place, provide the following statement on company letterhead and signed by the authorizing company representative:

"I hereby certify that (*company name*) currently has a contract or membership agreement with (*provider name*). It is effective from (*beginning date*) to (*ending date*). The subject contract or membership agreement provides immediate access to available personnel and/or equipment on a 24-hour per-day basis."

If applicable, also ensure your certification states:

"All contracted SMT members have been delegated the commensurate authority to fulfill their assigned SMT responsibilities."

In this certification statement, include the name of each organization, OSRO, cooperative, SROT organization, and provider of SMT members that will provide equipment, personnel, materials, and support vessels that you will use to contain and recover your WCD.

If you choose to certify that contracts or membership agreements are in effect, and you have more than one such contract or membership agreement in place, provide the following statement on company letterhead and signed by the authorizing company representative:

"I hereby certify that (*company name*) currently has contracts or membership agreements with the service providers listed below:

Service Provider Begin Date End Date

The subject contracts or membership agreements provide immediate access to available personnel and/or equipment on a 24-hour per-day basis."

If applicable, also ensure your certification states:

"All contracted SMT members have been delegated the commensurate authority to fulfill their assigned SMT responsibilities."

In this certification statement, include each OSRO, cooperative, SROT organization, and provider of SMT members that will provide equipment, personnel, materials, and support vessels that you will use to contain and recover your WCD.

Appendix E. Response Equipment (30 CFR 254.24)

a. <u>Spill Response Equipment Inventory</u> - Provide a current inventory of oil spill response materials and supplies, equipment, and dedicated response vessels available locally and regionally from the primary spill response equipment provider(s) cited in your OSRP. As applicable, include equipment to be used for wildlife rehabilitation and shoreline protection. Sort the inventory by location. Also sort by type, except in cases where dissimilar pieces of equipment form a response package. As appropriate, describe the capacities for each piece of equipment, including skimmers, prime movers, and storage containers. For items that do not have an associated capacity, such as boom, provide a description that aligns with response strategy requirements (e.g., 42-inch offshore inflatable boom, 18-inch shallow-water boom).

An equipment inventory may also be provided as hyper-links to each equipment provider's website if the website identifies their equipment and provides the same information (locations, types, capacities, and descriptions) as summarized in the preceding paragraph for a written inventory. Per § 254.30(b) you must submit revisions to your OSRP for approval within 15 days of when changes to your inventory significantly reduce your response capabilities (e.g., changes the equipment type and/or quantity specifically listed for your WCD response in Appendix H).

b. <u>Inspection and Maintenance Programs</u> - Describe the inspection and maintenance programs required by § 254.43 and include the intervals in which inspections are conducted. Confirm that the inspections and maintenance records are retained as required and indicate where they are located.

Appendix F. Support Services and Supplies (30 CFR 254.24)

Provide a directory of sources of key personnel, materials and supplies, equipment, and services available locally and regionally that includes names of organizations, description of services available, and telephone and telefax numbers. As applicable, include wildlife rescue and rehabilitation services; air, land, and marine transportation suppliers; onshore disposal sites; barge suppliers; food services; consultants; labor pools; lodging facilities; diving companies; remote sensing services; chemical and biological product and service providers; etc.

Appendix G. ICS Compliant Notification and Reporting (30 CFR 254.23(g)(1))

a. <u>Internal Spill Reporting</u> - Provide copies of appropriate internal company spill incident reporting documents.

b. <u>External Spill Reporting</u> - Describe the external (Federal, State, and local regulatory agencies) spill incident reporting documents that are consistent with those included in applicable ACPs.

Appendix H. Worst Case Discharge Scenarios (30 CFR 254.3(c)(4) and 30 CFR 254.26)

BSEE regulations at § 254.3 allow you to group your leases and facilities when preparing a Regional OSRP. While other grouping methods will be considered, BSEE approves of the following WCD response scenario categories. These categories are principally based on the type of activities proposed, the proximity to areas of special economic or environmental importance, and the characteristics of the oil that could potentially be discharged. You should describe a scenario for each category that represents the most comprehensive response within that category. This scenario will represent all potential WCD scenarios within that category. If your lease or facility does not fall into one of these categories, contact the OSRD Chief for further guidance.

BSEE will review the description of each OSRP WCD scenario response strategy based on the elements in § 254.26 to determine if the strategy is sufficient to contain and recover the discharge to the maximum extent practicable. These elements include the total EDRC, as calculated in accordance with § 254.44, and suitability of equipment within limits of current technology as required in § 254.26(e). BSEE's review of OSRPs is informed by information obtained during the *Deepwater Horizon* oil spill response where the total EDRC calculated for all equipment listed did not directly relate to the amount of oil that was actually removed from the water.

A fully developed response strategy, which includes a list of mechanical recovery equipment, is likely to result in a total calculated EDRC that exceeds the WCD calculation. BSEE also encourages you to use new technology and response systems that will increase the effectiveness of mechanical recovery. You should first develop your strategy to respond to each WCD scenario to the maximum extent practicable, and then identify the resources that are required to implement the strategy and finally identify the specific response equipment (including mechanical recovery equipment) and logistics you will use to meet these resource requirements.

BSEE will consider dispersants and *in-situ* burning when reviewing OSRPs as response methods. BSEE may consider these response methods in addition to, or partially in lieu of containment and/or mechanical recovery. For WCD scenarios that involve a drilling or production facility, BSEE will assess how you plan to cope with the initial spill volume upon arriving at the scene. BSEE will also consider your plan to support operations for a long-term response including offshore (onsite) transfer and storage of recovered oil, and availability of dispersants and fire boom.

a. Determination of volume for WCD Scenarios

Determine your WCD scenario oil volume using the criteria in § 254.47. Provide any assumptions you make and the supporting calculations you use to determine this volume (§ 254.26(a). If you have previously provided this information as part of an EP, DPP, or DOCD, you may reference it.

i. <u>Production Scenarios</u> - If the WCD scenario is an oil discharge from an oil production facility, calculate the initial volume of the WCD in accordance with the requirements of § 254.47(a). If operating from a production platform, also include the volume of all storage

tanks and flowlines, and the volume of oil calculated to leak from a break in any pipelines connected to the facility. If the WCD scenario is an oil discharge from a pipeline, calculate the initial volume of the scenario in accordance with the requirements of § 254.47(c).

ii. <u>Drilling Scenarios</u> - If the WCD scenario is an oil discharge during exploratory or development drilling operations, calculate the initial volume of the WCD in accordance with the requirements of § 254.47(b).

For exploratory or development drilling operations, determine the daily volume possible from an uncontrolled blowout by calculating the sum of uncontrolled flow from all producible reservoirs into the open wellbore. Consider the package of reservoirs in any interval between casing setting depths with the greatest discharge potential when exposed to an open borehole to be the WCD. Do not consider shallower producible reservoirs isolated by casing and cement in the uncontrolled flow.

b. Choice of WCD Scenarios to include in your OSRP

When you group leases and facilities in each BSEE OCS Region under § 254.3(c)(4), use the following guidelines to choose which WCD response scenarios to include and address in your OSRP:

i. Where applicable, select at least one drilling and one production WCD scenario for your leases and facilities located within 10 miles seaward of the coast line.

ii. Where applicable, select at least one drilling and one production WCD scenario for your leases and facilities located beyond 10 miles seaward of the coast line.

iii. Where applicable based on established agreements between stakeholders (e.g. the Flower Garden Banks Oil Spill Planning Area in the Gulf of Mexico OCS Region (GOMR) (see description below), select at least one WCD scenario for your leases and facilities located in areas of special economic or environmental importance, other marine sanctuaries or parks, marine traffic lanes and/or safety fairways, significant socioeconomic resources and areas, etc.

iv. Where applicable, you may address state-specific requirements in your WCD scenario(s) (e.g. State of Florida). Contact the OSRD Region for additional guidance on choosing WCD scenarios for this section.

Provide a detailed discussion of the factors you considered when choosing the WCD response scenarios included in your OSRP (e.g., type of operation; volume of oil; type of oil; seasonal variations; proximity to beaches, waterfowl, other marine and shoreline resources, and areas of special economic or environmental importance).

c. <u>WCD Scenario Discussion</u> - A thorough discussion for each of your WCD scenario(s) selected in section b above would include all of the following elements:

(i) <u>Facility Information</u> - The type of operation, the facility name and identification number or the pipeline segment/identification number, the area and block number where the facility is located, the distance in miles from shore, the components that make up your calculated WCD volume, the type of oil, and the API gravity. The following table is an example of a suggested format for presenting this information.

Type of Operation	Production
Facility Designation	Platform A
	(Complex ID 9999)
Facility Location (area/block)	MC 900
Distance to Nearest Shoreline (miles)	160 miles
Volume	
Storage tanks (total)	200 bbls
Flowlines (on facility)	15 bbls
Lease term pipelines	400 bbls
Uncontrolled blowout (volume per day)	600 bbls
Total Volume	1,215 bbls
Type of Oil(s) - (crude oil, condensate, diesel)	Crude oil.
API Gravity(s)	37°

(ii) <u>Land Segment Identification</u> - The onshore areas, by land segment, that your WCD could potentially contact. For example, in the Gulf of Mexico you may use the Oil Spill Risk Analysis Model (OSRAM) trajectory results specific to the area in which the lease or facility is located. You can find the OSRAM trajectory results and instructions at http://boem.gov/Environmental-Stewardship/Environmental-Assessment/Oil-Spill-Modeling/Oil-Spill-Risk-Analysis-Model-(OSRAM).aspx. For the GOMR, you can obtain hard copies of the results and instructions by contacting the GOMR Public Information Office at (504)736-2519 or 1-800-200-GULF.

(iii) <u>Resource Identification</u> - A list or map identifying any resources of special economic or environmental importance that could be impacted within land segments identified in section (ii) above or marine areas. At a minimum, include on the list or map those resources of special economic and environmental importance, if any, specified in the appropriate ACP(s). For example, if you are discussing a WCD scenario for a lease or facility located in the Flower Garden Banks Oil Spill Planning Area, identify the resources (including their seasonal variations) on the list or map instead of the land segment resources. Include the strategies you would use to protect the identified resources. A list of blocks included in this area is shown below: <u>Flower Garden Banks Oil Spill Planning Area</u> means that area of the GOMR consisting of the following blocks:

HI A-324	HI A-348	HI A-367	HI A-385	HI A-402	GB 136	GB 221	GB 271	EB 215
HI A-325	HI A-351	HI A-368	HI A-386	HI A-403	GB 138	GB 222	GB 309	EB 216
HI A-326	HI A-352	HI A-373	HI A-387	HI A-547	GB 139	GB 223	GB 310	EB 217
HI A-327	HI A-353	HI A-374	HI A-388	HI A-572	GB 140	GB 224	GB 311	EB 259
HI A-328	HI A-354	HI A-375	HI A-389	HI A-573	GB 141	GB 225	GB 312	EB 260
HI A-331	HI A-355	HI A-376	HI A-390	HI A-574	GB 177	GB 226	GB 313	EB 261
HI A-332	HI A-356	HI A-377	HI A-394	HI A-595	GB 178	GB 227	GB 314	EB 304
HI A-333	HI A-360	HI A-378	HI A-395	HI A-596	GB 179	GB 228	GB 355	
HI A-334	HI A-361	HI A-379	HI A-396	GB 95	GB 180	GB 265	GB 356	
HI A-335	HI A-362	HI A-380	HI A-397	GB 96	GB 181	GB 266	GB 357	
HI A-344	HI A-363	HI A-381	HI A-398	GB 97	GB 182	GB 267	GB 359	
HI A-345	HI A-364	HI A-382	HI A-399	GB 133	GB 183	GB 268	EB 128	
HI A-346	HI A-365	HI A-383	HI A-400	GB 134	GB 184	GB 269	EB 172	
HI A-347	HI A-366	HI A-384	HI A-401	GB 135	GB 185	GB 270	EB 173	

HI = High Island; GB = Garden Banks; EB = East Breaks

(iv) <u>Tactics</u> - Detailed tactics for open water, near shore, and inshore spill response. Ensure these tactics are sufficient to support the choice of recovery systems you use to contain and recover the discharge to the maximum extent practicable.

(v) <u>Response</u> - Your response to your WCD scenario in adverse weather conditions. Per § 254.26 you must describe a response that you will use to contain and recover the discharge to the maximum extent practicable. You may consider weathering and persistence of oil in the environment when determining the maximum amount of recoverable oil. If you choose to use a volume of recoverable oil to plan your response that is less than your WCD volume calculated in section (i), provide your assumptions and supporting calculations, including the characteristics of the oil, used to determine this volume. Include the following in your WCD scenario(s) response discussion:

(1) A description of the response equipment, personnel, materials, support vessels and strategies, that you will use to contain and recover the discharge offshore, to the maximum extent practicable, to protect the near shore, inshore, and shoreline environment, and to rescue and rehabilitate affected wildlife.

- a. In this discussion, include the types, quantity, and capabilities of the equipment and the name and location of the person(s) or organization(s) that would provide the equipment. Include the calculated EDRC values, where applicable.
 - 1. Determine the capability of response equipment listed in the scenario by the ability to spot oil, ability to function properly and continuously under anticipated conditions, encounter rate, availability of storage, and the methods described in §§ 254.44 and 254.45.
 - 2. Ensure response equipment is able to operate in adverse weather conditions specific to the operational location.
 - 3. Ensure the supplied equipment and materials are of sufficient quantity and recovery capacity to respond effectively to the volume of oil in the WCD scenario.

4. Discuss your provisions to access and deploy subsea containment resources for all WCD scenarios as applicable. If you have previously provided information to BSEE in accordance with current guidance for demonstration of subsea containment abilities, you may reference that information.

(2) A description of the personnel, materials, and support vessels that would be necessary to ensure that the identified response equipment is deployed and operated promptly, efficiently, and effectively. Include in this description the name and location of the person(s) or organization(s) that would provide these resources as well as the quantities and types (if applicable).

(3) A description of your oil storage, transfer, and disposal equipment. Include in this description the types, quantity, and capacities of the equipment and the name and location of the person(s) or organization(s) that would provide the equipment.

(4) A description of the near shore, inshore, and shoreline protection equipment (e.g., equipment identified in the applicable ACP GRP or equivalent protection strategies for environmentally sensitive and economically significant areas). Ensure the equipment is adequate to protect the length of shoreline projected to be impacted most heavily.

- (5) An estimation of the individual times needed for:
 - (i) procurement of the identified containment, recovery, and storage equipment;
 - (ii) procurement of equipment transportation vessels;
 - (iii) procurement of personnel to load and operate the equipment;
 - (iv) equipment loadout (transfer of equipment to transportation vessel[s]);
 - (v) travel to the deployment site (including any time required for travel from an equipment storage area); and
 - (vi) equipment deployment.

For operations in the POCSR, your discussion should include your method(s) to begin containment of the spilled oil within 1 hour, and to begin recovery of the spilled oil within 2 hours of discovering the release.

Ensure that the equipment, materials, and vessels described above are of sufficient quantity and capacity and are suitable within the limits of current technology to respond effectively within the range of anticipated environmental conditions. Use standardized, defined terms to describe the range of environmental conditions anticipated and the capabilities of response equipment. Examples of acceptable terms include those defined in American Society for Testing of Materials (ASTM) publication F625–94, *Standard Practice for Describing Environmental Conditions Relevant to Spill Control Systems for Use on Water*, and ASTM F818–93, *Standard Definitions Relating to Spill Response Barriers*.

Appendix I. Subsea Containment Information (30 CFR 254.23(g) and 30 CFR 254.24)

If your OSRP covers leases and facilities with operations using subsea BOPs or surface BOPs on floating facilities, BSEE would expect your OSRP to include information specific to subsea

containment activities in "Appendix I." BSEE also expects that most of this information will be incorporated by reference to other documents created for compliance with appropriate laws and regulations. BSEE recommends your references for this section are clearly described and include hyperlinks for easy access.

a. <u>Organizations</u> - <u>Identify</u> and briefly describe the organizations that will provide materials and supplies, equipment, and dedicated vessels necessary to subsea containment activities.

b. <u>Coordination</u> - Per § 254.5, describe how you will coordinate subsea containment activities with response operations and ensure compliance with appropriate laws and regulations.

c. <u>Materials, supplies, and equipment</u> - List the names, telephone numbers, addresses, and a brief description of the primary organizations that will provide materials, supplies, and equipment necessary to conduct subsea containment activities.

d. <u>Contractual agreements</u> - Furnish proof of any contracts or membership agreements specific to subsea containment activities with any organizations, cooperatives, organizations, and spill management team members who are not your employees and will provide equipment, personnel, materials, and support vessels that you will use to conduct these activities. To provide this proof, ensure copies of the contracts or membership agreements or certify that contracts or membership agreements are in effect and included in "Appendix D. Contractual Agreements." For each contract or membership agreement, include provisions for ensuring the availability of the personnel and/or equipment on a 24-hour per-day basis.

If you choose to provide a copy of a contract or membership agreement, ensure that the document clearly shows the service provider and dates of coverage and contains authorizing signatures of company representatives and service providers. If applicable, ensure your contract or membership agreement also specifically states that contracted SMT members have been delegated the commensurate authority to fulfill their assigned SMT responsibilities.

e. <u>Operating team</u> - Describe the makeup of a team of trained, prepared, and available (on a 24-hour per-day basis) personnel, and their field supervisors who will deploy and operate equipment and materials necessary to subsea containment activities. Identify the organizations that will provide personnel for this team and include the number and types of personnel available from each. Describe the training given to the members of the team who will deploy and operate equipment and materials necessary to subsea containment activities. Identify the location(s) where you keep course completion certificates or attendance records for all required training.

f. <u>Equipment inventory</u> - Provide a current inventory of any materials and supplies, equipment, and dedicated vessels available locally and regionally from equipment providers that you plan to use to conduct subsea containment activities. Describe the inspection and maintenance programs required by § 254.43 and include intervals in which inspections are conducted. Describe the inspections and maintenance records that are kept. State that a copy of these records is available at the location where the equipment is stored.

Appendix J. Oceanographic and Meteorological Information (30 CFR 254.3(d))

Provide the following oceanographic and meteorological information if you include state specific necessary data and information as part of your OSRP (e.g., State of Florida).

a. <u>Oceanographic information</u> – the prevailing and worst case currents, the range of tides, and the range of water depths applicable to the areas of your leases and facilities identified in accordance with Appendix H section b (iv).

b. <u>Meteorological information</u> - Seasonal and worst case weather patterns, including wind direction and speeds, and the range of water temperatures applicable to the areas of your leases and facilities identified in accordance with Appendix H section b (iv). Discuss how these factors may hinder your ability to track and monitor an oil spill. Discuss also how different seasonal conditions may affect the properties of spilled oil.

Appendix K. Bibliography (30 CFR 254.4)

List each referenced publication showing the title, author(s)/editor(s), publisher, and date of publication.