

MINUTE ITEM

This Calendar Item No. 35  
was approved as Minute Item  
No. 35 by the State Lands  
Commission by a vote of 3  
to 0 at its 1/31/85  
meeting.

CALENDAR ITEM

A 35

35

01/31/85  
W 40442  
PRC 2920  
Livenick

S 18

APPROVAL OF INSTALLATION OF  
FLOWLINE BUNDLES FROM SUBSEA COMPLETIONS  
ON PRC 2920 TO SHORE FACILITIES AT  
MOLINO, SANTA BARBARA COUNTY

OPERATOR: Shell California Production, Inc.  
P.O. Box 11164  
Bakersfield, California 93389-1164  
Attention: J. H. Ragland

AREA, TYPE LAND AND LOCATION:  
The activity involves laying flowline bundles  
in two existing rights-of-way, PRC 3014 and  
PRC 3015, from subsea wells located on tide and  
submerged lands under State Oil and Gas Lease  
PRC 2920 to the onshore Molino Gas Processing  
Plant in Canada  
de la Huerta, Santa Barbara County.

ACTIVITY: Two flowline bundles will be installed between  
the 2920-8 and 2920-9 subsea wells and an  
onshore gas processing plant (the Molino Gas  
Processing Plant) located in Canada de la  
Huerta in order to transport gas from the two  
wells located on PRC 2920 (see Exhibit B).

BACKGROUND: Lease PRC 2920.1 was issued to Shell Oil  
Company and Standard of California in 1962.  
Shell (operator) drilled on the lease and has  
continued to produce from the lease. Shell  
California Production, Inc. (SCPI) has  
submitted a request to the California State  
Lands Commission which proposes to complete two  
previously approved wells and to produce and  
transport sweet gas from those wells to the  
existing Molino gas processing plant. This new

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gas discovery is the result of approved drilling activities authorized under a resumption of drilling. Under the terms of the State Oil and Gas Lease Shell has a right to produce these new discovery wells.

SCPI anticipates production of 20 to 30 million cubic feet (MMCF) of sweet gas and 500 to 750 barrels of condensate per day. The plant was permitted by the Santa Barbara County Planning Commission in 1963, and was built the same year with a design capacity of 43 MMCF. Only minor remedial work on the plant is planned prior to processing the sweet gas.

SCPI has successfully drilled and tested the first of two previously authorized wells. The timing for drilling and completion of the second well is now being evaluated. After receiving permits, SCPI intends to complete the well, perform minor remedial work on the onshore processing plant, install the flowlines in previously authorized rights-of-way adjacent to existing pipelines and produce the wells. SCPI has agreed to amend Lease PRC 3014 and Lease PRC 3015 to provide for these additional lines and is working with Land Management staff to finalize the amendments. To avoid the bird nesting season in the Arroyo Hondo Creek riparian corridor, SCPI plans to conduct the two month long flowline construction phase of the project during the late winter months of 1984-1985.

Most phases of the projects have already received necessary permits. The gas plant received a Conditional Use Permit (CUP) from the County of Santa Barbara in 1963, rights-of-way for the flowlines were issued by both the State Lands Commission and upland owners in 1963. In 1980, an EIR (SCH 79101011) was certified by the State Lands Commission in which resumption of drilling operations on State Oil and Gas Lease PRC 2920.1 was discussed as well as production and processing of sweet gas from the lease. In 1984, an EIR (SCH 8311091) certified by the State Lands Commission addressed drilling three exploratory wells, including the two deep wells which presently are proposed for production and

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subsequent processing at the Molino Plant. Besides the authorization from the State Lands Commission, SCPI has identified the remaining permits to be obtained: a Final Development Plan Approval, a Conditional Use Permit and a Coastal Development Permit from the County of Santa Barbara for the onshore pipelines, an Encroachment Permit from the California Department of Transportation, a Stream Alteration Agreement with California Department of Fish and Game, a Coastal Development Permit (offshore) from the California Coastal Commission, and a permit from United States Army Corps of Engineers, and amendments to Lease PRC 3014 and Lease PRC 3015.

OTHER PERTINENT INFORMATION:

1. Pursuant to the Commission's delegation of authority and the State CEQA Guidelines (14 Cal. Adm. Code 15025), the staff has prepared and circulated for public review a Proposed Negative Declaration identified as EIR ND 378, State Clearinghouse 84101008 pursuant to the provisions of the CEQA.

Based upon the Initial Study, the Proposed Negative Declaration, and the comments received in response thereto, there is no substantial evidence that the project will have a significant effect on the environment (14 Cal. Adm. Code 15074(b)).

2. This activity involves lands identified as possessing significant environmental values pursuant to P.R.C. Section 6370 et seq. Based upon the staff's consultation with the persons nominating such lands and through the CEQA review process, it is the staff's opinion that the project, as proposed, is consistent with its use classification.
3. In accordance with P.R.C. Section 6818, the Initial Study and Negative Declaration were submitted to the Director of Parks and Recreation who has determined that the project will not interfere with

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recreational use of the littoral lands.  
Also in accordance with P.R.C.  
Section 6818, the Initial Study and  
Negative Declaration were submitted to the  
Attorney General who has determined that  
the project complies with the applicable  
provisions of law and the rules and  
regulations of the Commission.

AB 884: N/A.

EXHIBITS: A. Project Vicinity.  
B. Pipeline Route.  
C. Negative Declaration, EIR ND 378.

IS RECOMMENDED THAT THE COMMISSION:

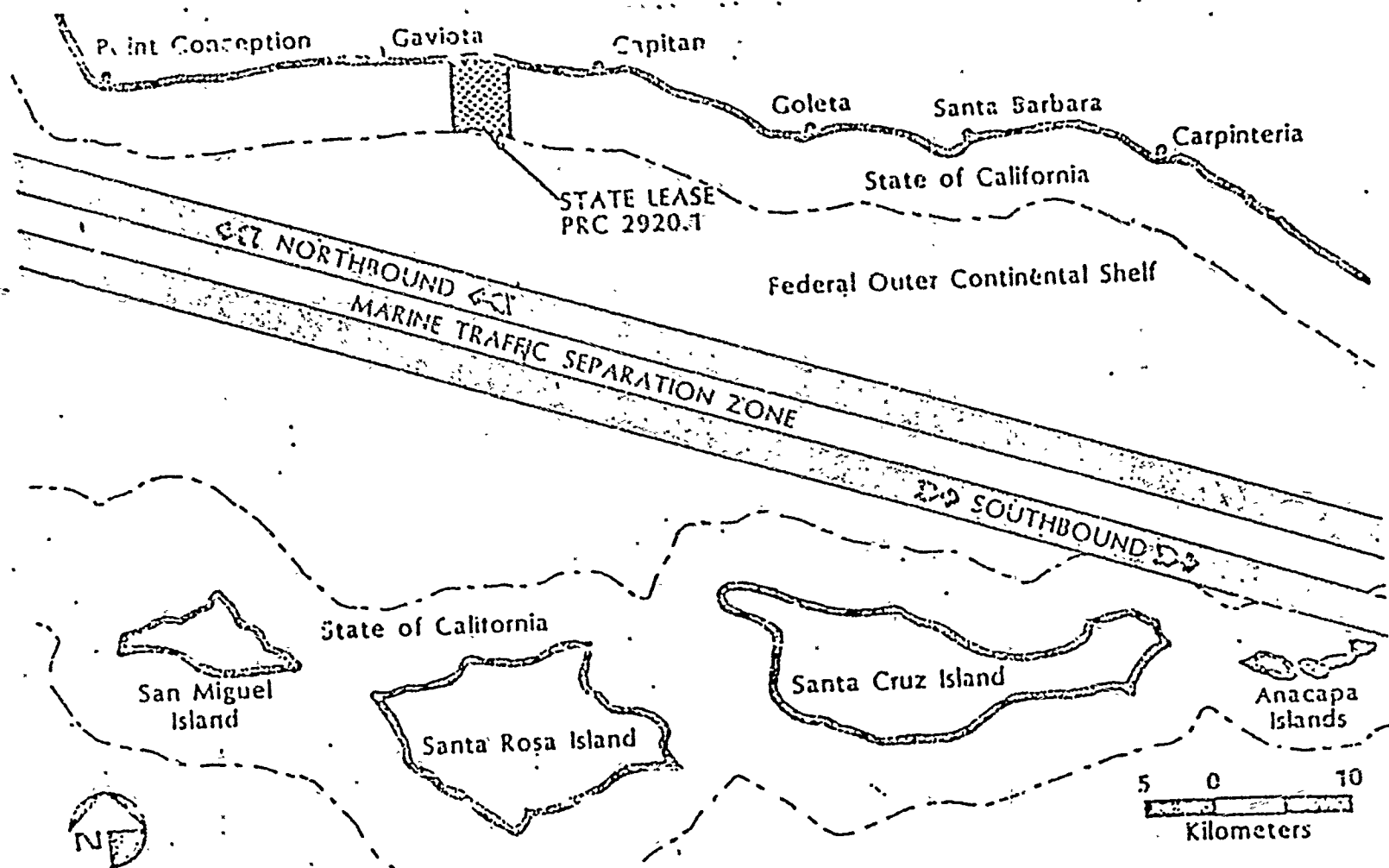
1. CERTIFY THAT A NEGATIVE DECLARATION, EIR ND 378, STATE CLEARINGHOUSE 84101008 ATTACHED AS EXHIBIT "C" AND INCORPORATED BY REFERENCE WAS PREPARED FOR THIS PROJECT PURSUANT TO THE PROVISIONS OF THE CEQA AND THAT THE COMMISSION HAS REVIEWED AND CONSIDERED THE INFORMATION CONTAINED THEREIN.
2. DETERMINE THAT THE PROJECT, AS PROPOSED, WILL NOT HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT.
3. FIND THAT THIS ACTIVITY, AS PROPOSED, IS CONSISTENT WITH THE USE CLASSIFICATION DESIGNATED FOR THE LAND PURSUANT TO P.R.C. 6370 ET SEQ.
4. AUTHORIZE SHELL CALIFORNIA PRODUCTION, INC. TO INSTALL TWO FLOWLINE BUNDLES FOR THE PURPOSE OF TRANSPORTING GAS PRODUCED UNDER PRC 2920.1 FROM SUBSEA COMPLETIONS TO ONSHORE PROCESSING FACILITIES AT MOLINO SUBJECT TO ENGINEERING APPROVAL BY THE CHIEF OR ASSISTANT CHIEF, EXTRACTIVE DEVELOPMENT PROGRAM, STATE LANDS COMMISSION.

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exhibit "A"



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Regional Vicinity

FIGURE

Exhibit "B"



Flowlines from SCPI's  
PRC 2920-8 and 2920-9  
Subsea wells to SCPI's  
Molino Gas Processing Plant

SCPI  
MOLINO  
GAS  
PLANT

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SANTA BARBARA CHANNEL

PROPOSED NEGATIVE DECLARATION

ND 378  
File Ref.: W 40442  
SCH #: 84101008

Project Title: Well Completion and Construction of Flowlines  
to Gas Plant

Project Proponent: Shell California Production, Inc. (SCPI).

Project Location: Molino Area, Santa Barbara County

Project Description:

The project involves the consideration of a well completion and flowline installation program proposed by the applicant on State Oil and Gas Lease PRC 2920 and adjacent privately owned lands.

Contact Person: Dwight E. Sanders  
Chief, Division of Research and  
Planning  
Telephone: (916) 322-7827

This document is prepared pursuant to the requirements of the California Environmental Quality Act (Section 21000 et seq., Public Resources Code), and the CEQA Guidelines (Section 15000 et seq., Title 14, California Administrative Code), and the State Lands Commission regulations (Section 2901 et seq., Title 2 California Administrative Code).

Pursuant to the Commission's delegation of authority and the State CEQA Guidelines (14 Cal. Admn. Code 15025), the staff has prepared a Proposed Negative Declaration identified as EIR 378, State Clearinghouse No. 84101008. Such Proposed Declaration was prepared and is circulated for public review pursuant to the provisions of the California Environmental Quality Act (CEQA).

Based on the attached Initial Study and the Proposed Negative Declaration, the staff of the Commission has developed the following proposed finding:

\*It is recommended that the Commission:

1. Certify that a Negative Declaration, EIR ND 378, State Clearinghouse No. 84101008, was prepared for this

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project pursuant to the provisions of the California Environmental Quality Act (CEQA) and that the Commission has reviewed and considered the information contained therein.

2. Determine that the project, as revised and approved, will not have a significant effect on the environment."

This proposed negative declaration references: 1) in terms of the Initial Study, only those potential environmental impacts which may occur as a result of or during the conduct of the well completion or flowline installation activities as proposed by the applicant; and 2) mitigation measures incorporated into the proposed project to avoid potentially significant effects.

The Initial Study (see Part I) discussed several potential environmental impacts. These impact areas are listed below with their page listings for reference from the Initial Study.

<u>Impact Area</u>	<u>Page</u>
Geotechnical Air Quality	17
Oceanography	18
Marine and Terrestrial Biology	20
Cultural Resources	23
Socioeconomics	25
Land Use and Coastal Policies	26
Visual Resources	27

Mitigation measures designed to address the potential impacts listed in the Initial Study and developed from comments by other responsible agencies have been included in the proposed project as indicated and discussed below with the associated impact

Impact Area

Marine Biology-Kelp

Mitigation

The applicant will perform a post-construction survey of the pipeline corridor through the kelp beds to determine the magnitude of the kelp loss, if any. If there is no kelp loss or if it is insignificant as determined in a review of the survey results by Department of Fish and Game personnel, then no additional surveys will be required. Based on such review, it will be determined that a survey of the area must be conducted two years after project completion to determine if the kelp has returned to pre-project densities. If the kelp



has not returned to pre-project densities, then SCPI shall revegetate the impact areas.

#### Discussion

Although the staff of the Commission believes there will be no significant damage to the kelp as a result of the project as proposed, this survey will enable the Department of Fish and Game to evaluate the effect of the project on the kelp and, if necessary, to recolonize disturbed kelp. Because SCPI has recently surveyed the kelp zone, it will not be necessary to perform a pre-project survey of the kelp beds.

The staff of the Commission adopts these recommendations, revises the proposed project accordingly, and finds that the project, as revised, avoids or mitigates the effects to a point where clearly no significant effects would occur.

#### Mitigation

Prior to construction, SCPI shall map the rocky intertidal areas which lie west of and adjacent to the flowline landfall. Copies of the completed map of such areas shall be furnished to the County of Santa Barbara, the State Department of Fish & Game, the Coastal Commission and the State Lands Commission.

#### Discussion

This condition will cause the project to be in compliance with Santa Barbara County Coastal Plan policy 9-1, page 120:

The staff of the Commission adopts these recommendations, revises the proposed project accordingly, and finds that the project, as revised, avoids or mitigates the effects to a point where clearly no significant effects would occur.

#### Impact Area

##### Terrestrial Biology

#### Mitigation Measure

Mechanized equipment and storage shall be excluded from the Arroyo Hondo riparian habitat.

#### Discussion:

According to the project description, SCPI will not be using mechanized equipment or storing in the riparian habitat. An existing graded road and graded parking area will provide access to the culverts which lead under Highway 101 and into

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areas which are not riparian in nature and area not identified as environmentally sensitive (areas which have been permanently altered by fill and the emplacement of cement slabs). Where SCPI has to move the flowline bundle over the Arroyo Hondo creek bed, rollers will be used so that the activity does not impact the creek bed. Nonetheless SCPI will be restricted from using mechanized equipment, or placing storage, in the riparian habitat. Such restriction will ensure that the habitat is protected.

The staff of the Commission adopts these recommendations, revises the proposed project accordingly, and finds that the project as revised avoids or mitigates the effects to a point where clearly no significant effects would occur.

Mitigation

SCPI shall replace with native species any riparian or non-agricultural vegetation lost or destroyed as a result of the pipeline construction activities.

Discussion:

SCPI proposes to: 1) reseed the pipeline corridor; 2) cut the one mature willow tree which will be affected by the project in such a way as to encourage resprouting, i.e., at or near ground level; 3) and re-emburse the land owner for his expenses replanting his avocado trees. By the incorporation of such condition into the project, Commission staff believes that all impacts related to removal or disturbance of non-cultivated terrestrial vegetation can be eliminated.

The staff of the Commission adopts these recommendations, revises the project accordingly, and finds that the project as revised avoids or mitigates the effects to a point where clearly no significant effects would occur.

Mitigation:

No construction activities shall be undertaken within the Arroyo Hondo creek bed during the avian nesting season as defined by the Department of Fish & Game.

Discussion:

By seasonally restricting activity within the Arroyo Hondo creek bed, impacts to birds during nesting season can be entirely eliminated.

The staff of the Commission adopts these recommendations, revises the proposed project accordingly, and finds that the

project as revised avoids or mitigates the effects to a point where clearly no significant effects would occur.

Mitigation:

SCPI shall submit a notification, pursuant to Fish and Game Code section 1603, to the Department of Fish and Game prior to the initiation of construction activities within Arroyo Hondo.

Discussion:

This notification procedure will ensure that the Department of Fish and Game is advised of the actual dates of the project and can work with the applicant to ensure that Departmental concerns are adequately met.

The staff of the Commission adopts these recommendations, revises the proposed project accordingly, and finds that the project as revised avoids or mitigates the effects to a point where clearly no significant effects would occur.

Impact Area

Socioeconomics

Mitigation:

SCPI shall use the same procedure for notifying commercial fishermen of its activities relative to the proposed project as is required in the SLC's "General Permit to Conduct Geophysical Surveys".

Discussion:

This procedure will assure that commercial fishermen are adequately notified of SCPI's activities, and will better allow fishermen and SCPI to avoid conflicts during the well completion and the flowline installation activities on the affected tide and submerged lands.

The staff of the Commission adopts these recommendations, revises the project accordingly, and finds that the project, as revised, avoids or mitigates the effects to a point where clearly no significant effects would occur.

Mitigation:

SCPI will minimize any anchor scarring from construction vessels by limiting the number of vessel movements to three.

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Construction vessels will not anchor in the kelp beds and pipelines will be consolidated when pulled through the kelp beds to minimize impact. SCPI will place and retrieve anchors in a vertical motion in order to minimize disturbance of the ocean floor. SCPI will remove all debris from the project area. Where scarring is evident and could create a problem for the fishing industry, SCPI will recontour the particular area.

Discussion:

These requirements ensure that minimal anchor scarring will occur and that no scars which could adversely affect fishermen will remain after the construction project has been completed.

The staff of the Commission adopts these recommendations, revises the proposed project accordingly, and finds that the project, as revised, avoids or mitigates the effects to a point where clearly no significant effects would occur.

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STATE LANDS COMMISSION  
245 WEST BROADWAY, SUITE 425  
LONG BEACH, CALIFORNIA 90802  
TELEPHONE: (213) 590-5201

Exhibit "C"



File Ref: W 40442  
SCH #: 84101008

November 2, 1984

SUBJECT: Notice of Consultation/Preparation Pursuant to Sections 21080.3 and 21088.4 of the Public Resources Code

The State Lands Commission is the lead agency for the purposes of the California Environmental Quality Act with regard to the proposed project described in the attached material, and by this letter requests, pursuant to Public Resources Code Sections 21080.1, 21080.2 and 21080.3, the position of your agency as to the analysis of this project.

The Commission certified an EIR (SCH 79101011) in 1980 which analyzed the impacts of exploratory and production activities on the affected lands and also certified a supplemental EIR (SCH 83110901) in 1984 which addressed additional exploratory activities in the same area. The attached project description provides specific references to all appropriate sections of these documents relevant to this project. Mitigation measures identified in the earlier review processes have been incorporated into the proposed project. Because these extensive revisions have been incorporated into the proposed project, the staff of the Commission believes that the project will not have a significant effect on the environment and thus, that a Negative Declaration is the appropriate environmental document for the project.

Although the law allows 30 days to respond, we ask you to respond as quickly as possible so that we can proceed in the preparation of the necessary environmental document. Please send your comments to Susan Livenick at the above address.

Thank you for your cooperation.

Sincerely,

Donald J. Everitts, Assistant Chief  
Extractive Development Program

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INITIAL STUDY  
WELL COMPLETION, INSTALLATION OF FLOWLINES  
AND PRODUCTION OF GAS  
MOLINO FIELD, SANTA BARBARA COUNTY

Introduction

Shell California Production Inc. (SCPI) has submitted application to the California State Lands Commission and to the County of Santa Barbara in which a proposal to complete two previously approved wells and to produce and process sweet gas from those wells at the existing Molino gas plant is described.

SCPI anticipates production of 20 to 30 million cubic feet (MMCF) of sweet gas and 500 to 750 barrels of condensate per day. The plant was permitted by the Santa Barbara County Planning Commission in 1963, was built the same year with a design capacity of 50 MMCF and has processed as much as 48 MMCF of gas and 1,110 barrels of condensate per day. Only minor remedial work of the plant is planned prior to processing the deep sweet gas.

SCPI is presently (10/84) drilling the first of these two previously authorized deep wells, and plans to suspend that well and drill the second well immediately thereafter. As soon as permits have been issued, SCPI intends to complete the wells, perform minor remedial work to the onshore processing plant, install the flowlines in previously issued right-of-ways adjacent to existing pipelines and produce the wells. To avoid the bird nesting season in the Arroyo Hondo Creek riparian corridor, SCPI hopes to conduct the two month long flowline construction phase of the project during the late winter months of 1984-1985.

Most phases of the projects have already received necessary permits. The gas plant received a Conditional Use Permit (CUP) from the County of Santa Barbara in 1963, rights of way for the flowlines were issued by both the State Lands Commission and upland owners in 1963. In 1980, an EIR (SCH# 79101011) was certified by the State Lands Commission in which resumption of drilling operations on State Oil and Gas Lease PRC 2920.1 was discussed as well as production and processing of sweet gas from the lease. In 1984, an EIR (SCH# 83110901) certified by the State Lands Commission addressed drilling three exploratory wells, including the two deep wells which presently are proposed for production and subsequent processing at the Molino Plant. SCPI has identified remaining permits to be obtained: a Final Development Plan Approval, a Conditional Use Permit and a Coastal Development Permit from the County of Santa Barbara for

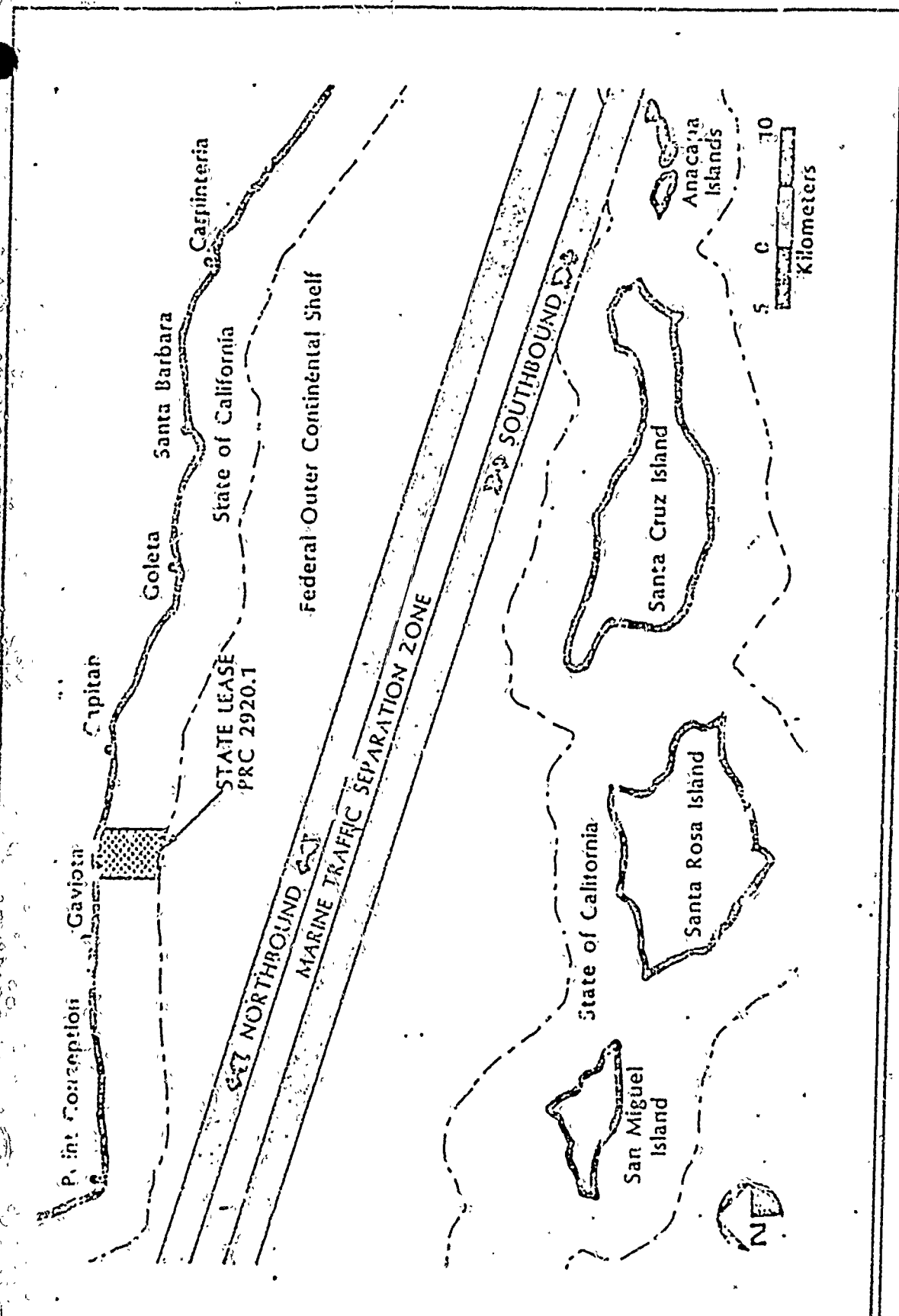


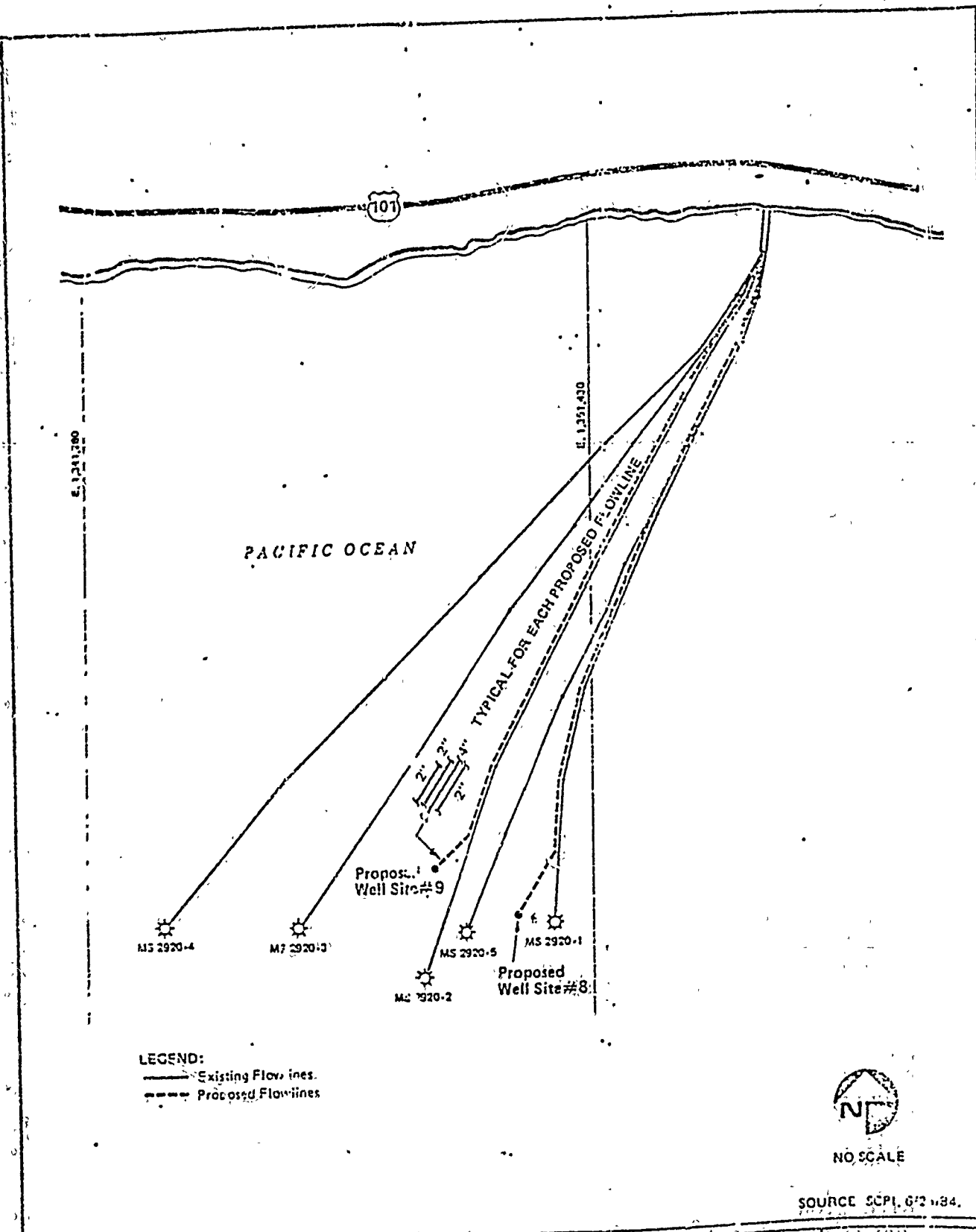
FIGURE 7

Regional Vicinity

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the onshore pipelines, an Encroachment Permit from the California Department of Transportation, a Stream Alteration Agreement with California Department of Fish and Game, a Coastal Development Permit (offshore) from the California Coastal Commission and a permit from the U.S. Corps of Engineers. The SLC will review the development for environmental and engineering concerns and for consistency with the lease obligations and will consider authorizing construction of the offshore pipelines.





Proposed Offshore Well Site and Flowline Bundle Locations

FIGURE  
2

### Detailed Project Description

Shell California Production Inc. (SCPI) is presently drilling the first of two previously approved exploratory gas wells on State Oil and Gas Lease PRC 2920.1 offshore Molino, Santa Barbara County. A major gas discovery has been made on the adjacent leasehold, producing from the target zone in the same gas field ("Molino") and SCPI is requesting authorization to produce and process the gas which the two exploratory wells are expected to find.

SCPI proposes to complete each of the two wells, install subsea wellheads, install a combination of offshore and onshore pipelines ("flowline bundles") and process the produced gas and condensate at the existing Molino gas plant.

### Subsea Wellhead Locations

The subsea wellhead locations will be positioned as shown in Figure 2 (in relation to existing subsea structures) and Table 1. The wellheads are to be located at existing permitted well locations.

Table 1

#### PROPOSED SUBSEA WELLHEAD LOCATIONS

Well No.	Location (Lambert Grids)		Approximate Water Depth (feet)	Approximate Distance from Shore (miles)
	X	Y		
8	1,349,915	347,000	237	2.7
9	1,348,180	347,890	230	2.4

### Flowline Alignments

To connect the permanent subsea wellheads to the onshore Molino Gas Processing Plant, a combination of offshore and onshore pipelines must be installed. Figure 2 depicts these flowline alignments. From the subsea wellhead #8, the flowline bundle will lie completely within the existing pipeline corridor from well MS 2920-1 except for a short distance from well #8 to ROW 2920-1. From wellhead #9, the flowline bundle will be contained completely within the existing corridor from well MS 2920-2 except for a short distance from well #9 to ROW 2920-2.

Onshore, the proposed flowline bundles will parallel the existing bundles, within SCPI's existing right-of-way. The right-of-way (Figure 3) enters the Arroyo Hondo Creek channel bed, passing beneath the Southern Pacific Railroad bridge. The existing flowlines, buried to a depth of approximately 30 inches, are located immediately east of a concrete box culvert. The right-of-way continues in a northerly and northeasterly direction beneath the abandoned Highway 101 concrete arch bridge and then beneath the recently reconstructed northbound and southbound lands of Highway 101 through an existing 36 inch box culvert. Past the highway, the alignments continue in a northerly direction to a point about 200 feet north of the northbound land of Highway 101.

At this point, the right-of-way veers easterly at the base of a 130 foot high slope, then continues up the slope for approximately 300 feet. After reaching a level, graded area constructed during the installation of the existing flowline bundles (1963), the right-of-way continues easterly for about 1300 feet, and then veers northerly 660 feet to the site of the existing Molino Gas Processing Plant.

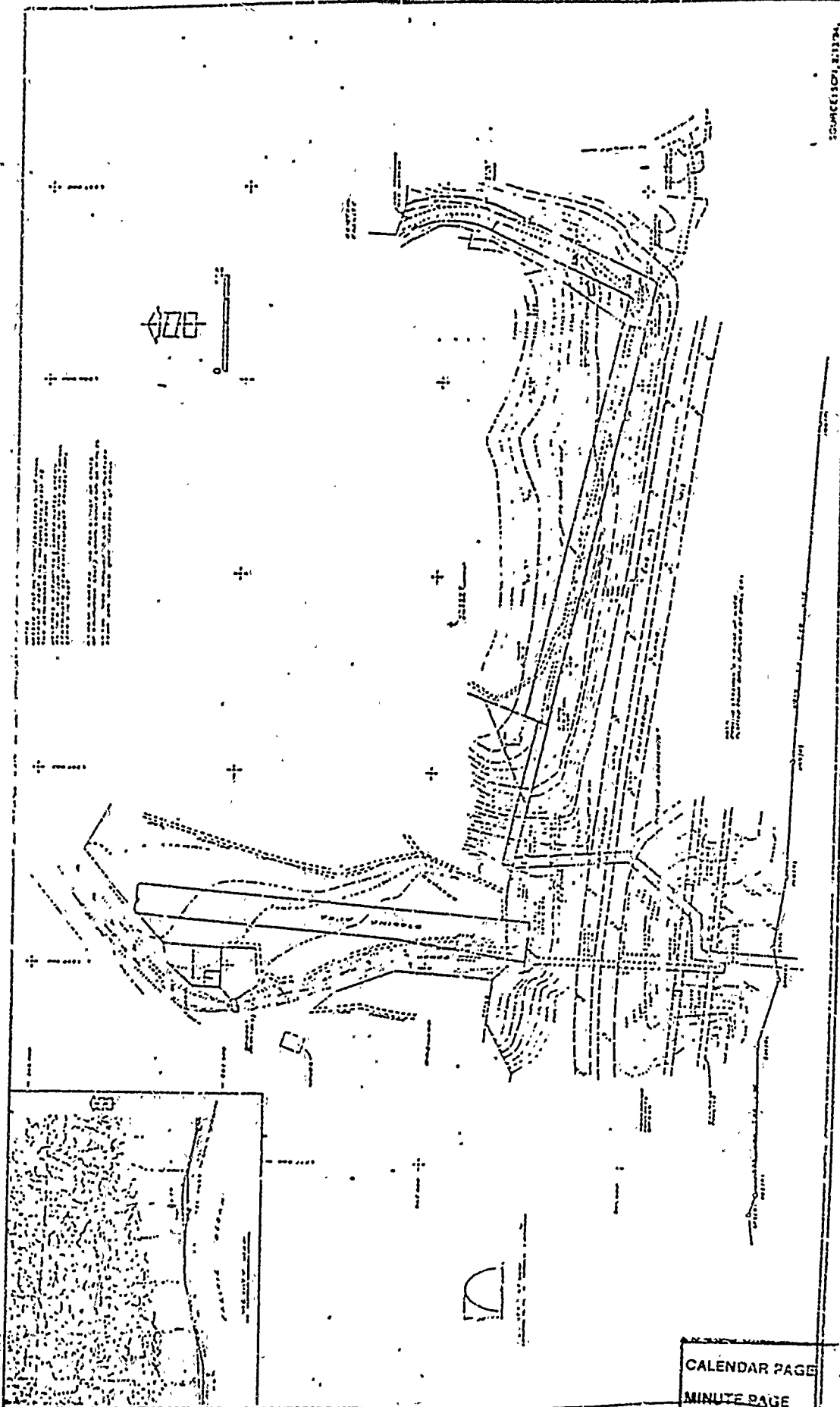
#### Molino Gas Processing Plant

The Molino gas plant is located approximately 1230 feet inland from the mouth of Canada de la Huerta or assessor's parcel no. 21-150-15. The facility was authorized by action of the Santa Barbara County Planning Commission on January 16, 1963, and was constructed in 1963 to process production from natural gas wells in PRC 2920.1. At maximum rate, the facility has processed approximately 48 MMCFD of gas and 1100 T/D of condensate. SCPI temporarily shut in the gas plant on May 1, 1984 subsequent to an agreement (MOA of March 7, 1984) with the Santa Barbara Air Pollution Control District (APCD) outlining emissions offsets from the facility.

The main portion of the Molino gas plant located in Canada de la Huerta is situated on the lowest terrace (220 feet elevation) of the three separate filled and graded terraces. The plant site is situated within the natural watercourse of the canyon and the terraces are underlain by a series of concrete drainage culverts that serve to handle the canyon runoff. Access to the plant is provided by a paved roadway connecting with Highway 101. Several booster compressors are located on Terrace 2 and Terrace 3 is vacant. The site (Terrace 1) is approximately 3.3 acres. Immediate surrounding land use consists primarily of agriculture with livestock grazing. The Canada de la Pila sanitary landfill lies in a canyon about 400 feet east of the existing gas plant. The area south of Highway 101 is designated rural residential (40-100 acres per dwelling unit minimum). The facility is shielded from Highway 101 by the canyon and vegetation.

On SCPI's behalf, Fluor Engineers Inc. have recently inspected the existing gas plant and found it to be in good mechanical condition. The plant can be prepared for startup with minor effort well within the constraints of the existing conditional use permit.

SCPI plans to replace in kind an existing recycling gas compressor (app. 50 hp), replace in kind an existing glycol regenerator (app. 1.0 mm Btu/hr.), and perform other minor miscellaneous maintenance associated with an orderly turnaround of the facility.



SOURCE: 1971, 1974.

FIGURE  
2A  
2

Existing and Proposed Utility Paths

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After start-up, the plant will operate in full compliance with the March 7, 1984 MOA between SCPI and the County APCD, which provides air emission offsets for SCPI's drilling activities on the lease. Operating the plant in this manner will also fully offset emissions associated with well completion and flowline installation. The plant will operate within the emission ceilings established in the November 4, 1981 permit recertification agreement between SCPI and the APCD.

#### Staging Area

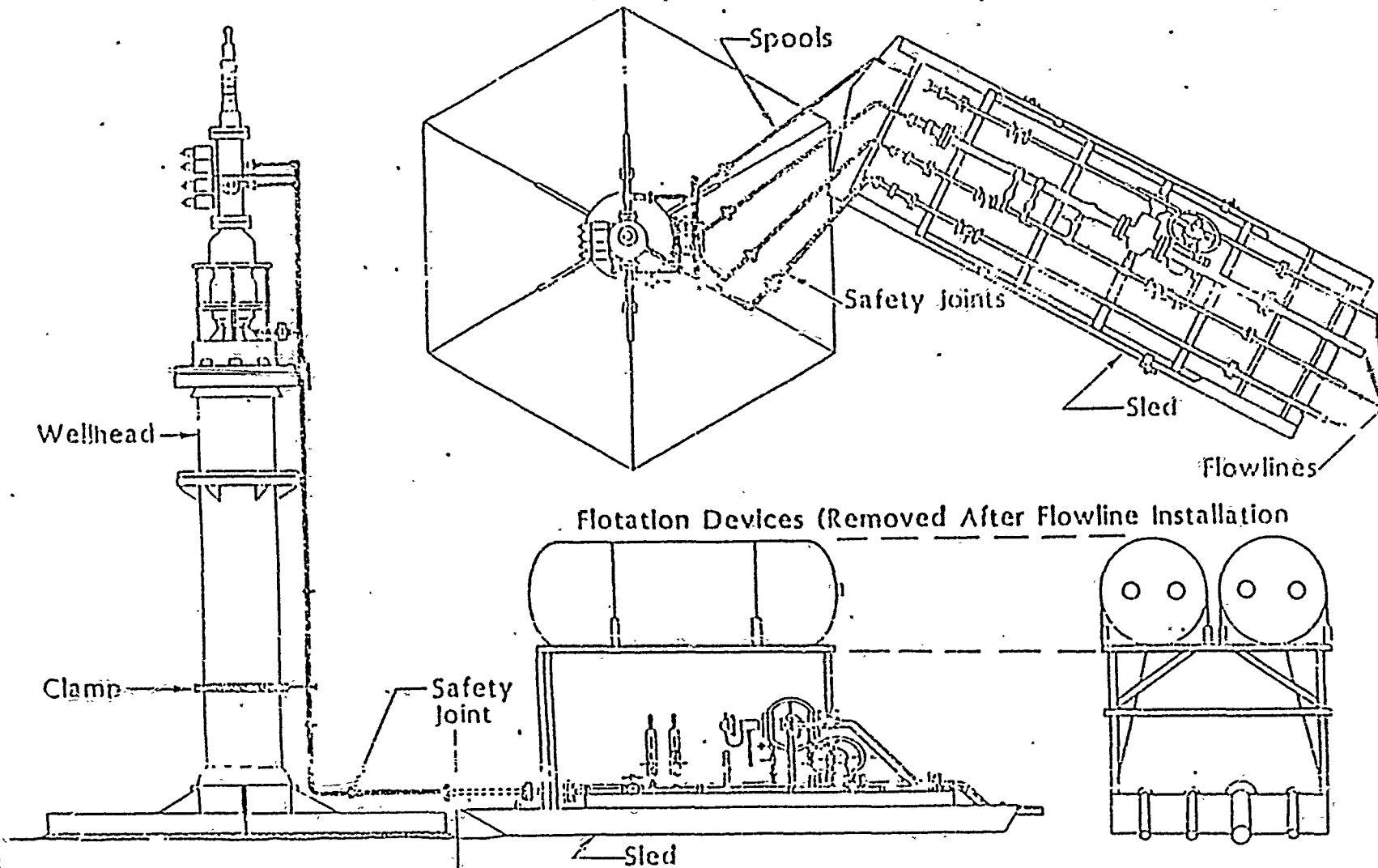
For flowline construction, SCPI will employ a staging area located in the same general area as that used in 1963 for installation of the original offshore flowlines. Approximately 1.75 acres in size, the staging area is located directly north of Highway 101 adjacent to Arroyo Hondo (Figure 3). The site is presently part of an avocado orchard, and is presently under an agricultural preserve contract. The land is a part of the 782 acre Euith C. Field agricultural preserve. Eighteen acres of the preserve is under avocado cultivation and 1.8 acres will be used for the staging area and its access easement.

#### MOLINO FIELD DEVELOPMENT HISTORY

Resumption of drilling operations on Lease PRC 2920.1 was approved by the State Lands Commission (SLC) after environmental review (State Lands Commission, 1980, Final Environmental Impact Report, Resumption of Exploratory and Developmental Drilling Operations, Lease PRC 2920.1, prepared by WESTEC Services, Inc.; hereinafter referred to as SLC 1980). In addition to addressing drilling impacts, this EIR included completion impacts including installation of flowlines and gas plant operations. SCPI drilled one exploratory well on the Lease (MS 2920-6) but abandoned the well in its upper intervals prior to reaching its primary target (Eocene Matilija Sands) as a result of scheduling conflicts and APCD permit time constraints.

In March 1984, the SLC approved the drilling of three additional exploratory wells at three of six selected sites (State Lands Commission, 1984, Final Supplemental Environmental Impact Report, Resumption of Exploratory Drilling Operations by Shell California Production Inc. Lease PRC 2920.1, prepared by WESTEC Services, Inc., hereinafter referred to as SLC 1984). In addition to SLC approval SCPI obtained permits from the California Coastal Commission and APCD for exploratory drilling.

SCPI has drilled and tested one of these three wells (Molino No. 7, an exploratory well for the Monterey sands) to date.



SOURCE Shell California Production, Inc.

Flowline/Wellhead Component Installation

FIGURE

4

If economically recoverable gas reserves in the deep Eocene Matilija formation are found from Molino No. 8, which is presently being drilled, SCPI plans to complete it and drill and complete an additional well (Molino No. 9), both as Matilija gas producers. The two wells would be brought into production by installing subsea wellheads and offshore and onshore flowlines, through existing onshore and offshore rights-of-way, connecting to SCPI's Molino gas processing plant.

#### PRODUCTION PROGRAM

##### Construction and Installation

Completing and producing the wells will require:

1. Permanent wellhead installation
2. Offshore flowline installation
3. Onshore flowline installation

The following subsections discuss each of the activities. Table 2 shows the time allocated for specific development activities throughout the project.

##### Permanent Wellhead Installation

SCPI will install permanent subsea wellhead equipment on each well, utilizing the jackup drilling vessel JFP III or like vessel. The wellhead and associated flowlines are shown schematically on Figure 4.

##### Onshore Flowline Installation and Testing

The onshore portion of the flowline bundle will be installed utilizing standard construction techniques within the existing pipeline easement and right-of-way. The flowlines will exit the surf zone and parallel the present flowline bundles within the existing SCPI right-of-way previously described and shown on Figure 3. Installation of the flowlines between the landfall and the gas plant will require minimal clearing and grading for a construction corridor up to 30 feet wide. Debris will be disposed of at an approved site. Pipeline construction activities will include ditching, boring, stringing the pipe, bending pipe for changes in direction, cleaning, welding, coating, lowering the pipe into the ditch, hydrostatic testing, backfilling, and cleanup.

The line will be buried a minimum of 30 inches below the winter beach surface. The pipeline trench will be excavated approximately 3 feet wide and 3 feet deep. Excavated material will be stockpiled alongside the trench for backfill after pipeline installation.

Table 2

CONSTRUCTION TIME REQUIREMENTS FOR WELL COMPLETIONS  
AND FLOWLINE INSTALLATIONS

<u>Activity (Offshore Lines)</u>		<u>Days/Well</u>
Complete well and install wellhead equipment		15
Weld (Offshore) 900 foot flowline segments		10
Survey flowline route		1
Pull flowline to wellhead		4
Position sled at wellhead <sup>(1)</sup>		2
Install flowline through surf zone		2
Test flowline		2
Connect to wellhead		2
Displace flowline		1
Total		20 <sup>(2)</sup>
<u>Activity (Onshore Lines)</u>		<u>Days/Well</u>
Weld and install lines		7
Test lines		2
Total		9
<u>Activity (One time only)</u>		<u>Days</u>
Prepare onshore staging area for offshore lines		14
Trenching/boring onshore R.O.W.		7
Backfilling and cleanup onshore R.O.W.		5
Moving barge to Molina site and back again		2
<b>TOTAL CONSTRUCTION TIME FOR ALL OPERATIONS - WELLS</b>		<b>66 days</b>

(1) Actual time required is 1.5 days.

(2) Many construction operations are handled concurrently.



Before the welded pipeline is lowered into place, the trench will be cleared of any extraneous material that might damage the pipeline or its coating. Cathodic protection systems will be installed during pipeline installation. Following hydrostatic testing, the ground surface will be restored to a condition as near as practicable to that which existed prior to construction.

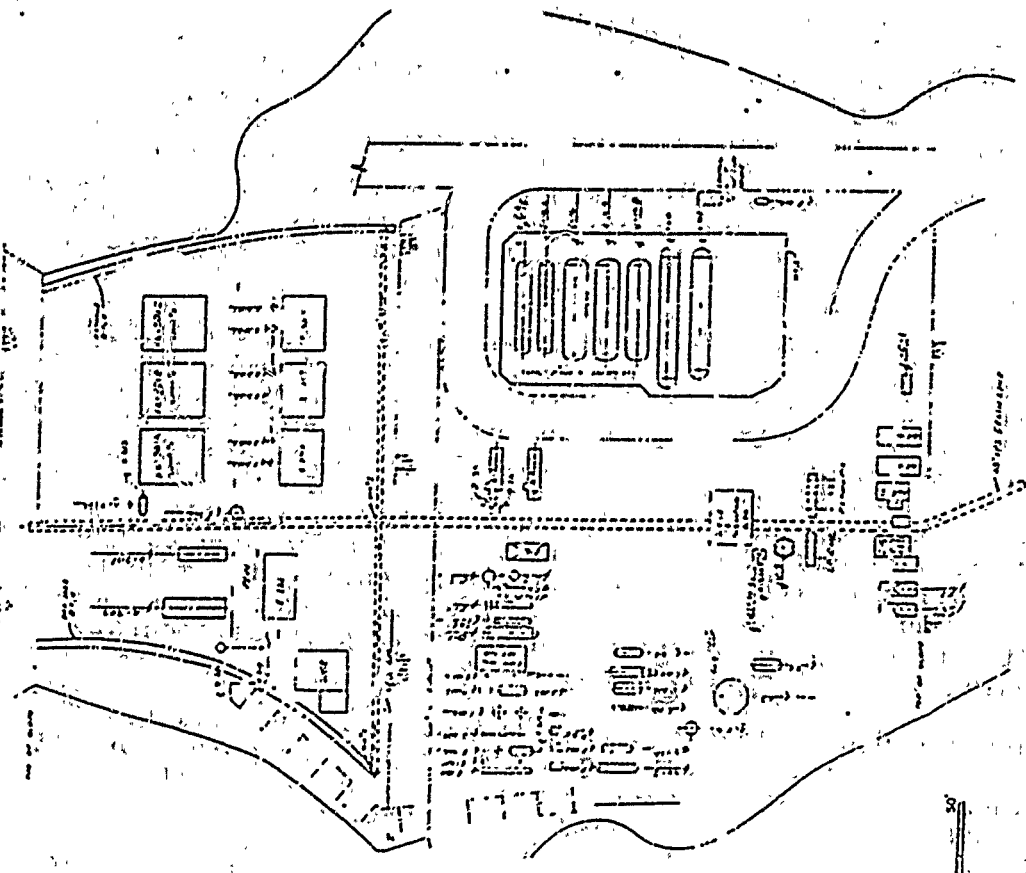
Hydrostatic testing, conducted in accordance with requirements of the U. S. Department of Transportation, Office of Pipeline Safety Regulations, will be performed after construction is completed and before the line is placed into service. Clean test water will be disposed of through the Molino plant water disposal system. Applicable state and local testing regulations will also be followed. Construction and testing of the 3100 feet of onshore pipelines between the landfall and the gas plant is expected to take approximately two weeks. Work will be conducted during daylight hours. An average of 15-20 workers will be involved.

#### Offshore Flowline Installation and Testing

Coincidentally with the placement of the onshore flowlines, the subsea portions of the lines will be installed. Individual lengths of four inch and two inch pipe will be trucked to the staging area in Arroyo Hondo. In the staging area, individual lengths of pipe will be welded together into 900 foot sections. Each of the two subsea wells will be connected to four offshore pipelines, collectively called a flowline bundle. Approximately 2.9 miles of flowline bundle per well will be assembled.

Upon completion of the required number of sections, a "pull" barge assisted by a support boat will be navigated into position offshore of the staging area. A wire cable operated off a winch on the barge will be brought to shore and connected to the flowline bundle, which will be guided on rollers through the highway culverts to the beach. The barge winch will "pull" the flowline bundle offshore in sections. After each pull, additional sections of flowline bundle will be welded to the onshore end; this will continue until the entire distance to each wellhead is spanned. Periodically, the barge may be moved to different offshore locations in order to provide accurate positioning of the flowline bundle.

The flowline bundle launched from the beach area will be attached to a "sled", providing a common pulling point for all the lines. The sled also will serve as the base for the manifolding and valves necessary for operation of the subsea wellhead. A buoy system is attached to the sled in order to provide hydrodynamic stability underwater. Both the sled and flowlines are negatively buoyant, and additional floats will be



NO.	DESCRIPTION
1	EXISTING PLANT
2	EXISTING BUILDINGS
3	EXISTING TANKS
4	EXISTING PAVEMENT
5	EXISTING FENCE
6	EXISTING UTILITY LINES
7	EXISTING ROADS
8	EXISTING DRIVEWAYS
9	EXISTING SIDEWALKS
10	EXISTING LANDSCAPING
11	EXISTING TREES
12	EXISTING SHRUBS
13	EXISTING GRASS
14	EXISTING SOIL
15	EXISTING WATER
16	EXISTING SEWER
17	EXISTING GAS
18	EXISTING ELECTRIC
19	EXISTING TELEPHONE
20	EXISTING CABLE
21	EXISTING SLOTTED DRAINAGE
22	EXISTING CURBS
23	EXISTING GUTTERS
24	EXISTING DOWNSPOUTS
25	EXISTING LIGHT FIXTURES
26	EXISTING SIGNAGE
27	EXISTING PAINT
28	EXISTING ROOFING
29	EXISTING Siding
30	EXISTING FLOORING
31	EXISTING CEILING
32	EXISTING MECHANICAL
33	EXISTING ELECTRICAL
34	EXISTING PLUMBING
35	EXISTING HVAC
36	EXISTING INSULATION
37	EXISTING GLASS
38	EXISTING METAL
39	EXISTING WOOD
40	EXISTING CONCRETE
41	EXISTING ASPHALT
42	EXISTING GRAVEL
43	EXISTING SAND
44	EXISTING DIRT
45	EXISTING ROCK
46	EXISTING BRICK
47	EXISTING TILE
48	EXISTING STONE
49	EXISTING CEMENT
50	EXISTING GROUT
51	EXISTING ADHESIVE
52	EXISTING SEALANT
53	EXISTING PAINT
54	EXISTING STAIN
55	EXISTING WAX
56	EXISTING POLISH
57	EXISTING CLEANER
58	EXISTING DEGREASER
59	EXISTING DISINFECTANT
60	EXISTING PESTICIDE
61	EXISTING FERTILIZER
62	EXISTING SOIL CONDITIONER
63	EXISTING MULCH
64	EXISTING COMPOST
65	EXISTING FERTILIZER
66	EXISTING SOIL CONDITIONER
67	EXISTING MULCH
68	EXISTING COMPOST
69	EXISTING FERTILIZER
70	EXISTING SOIL CONDITIONER
71	EXISTING MULCH
72	EXISTING COMPOST
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86	EXISTING SOIL CONDITIONER
87	EXISTING MULCH
88	EXISTING COMPOST
89	EXISTING FERTILIZER
90	EXISTING SOIL CONDITIONER
91	EXISTING MULCH
92	EXISTING COMPOST
93	EXISTING FERTILIZER
94	EXISTING SOIL CONDITIONER
95	EXISTING MULCH
96	EXISTING COMPOST
97	EXISTING FERTILIZER
98	EXISTING SOIL CONDITIONER
99	EXISTING MULCH
100	EXISTING COMPOST

FIGURE 15

Existing Molokini Cask Processing Plant

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placed periodically along the flowline bundle as it is pulled offshore. The sled and flowline bundle thus will be supported slightly above the sea floor in order to facilitate accurate positioning of the system. Prior to the initial pulling operation, sighting ranges will be set up onshore, and offshore spar buoys placed to delineate the course of the flowline bundle.

Upon final positioning of the flowline bundle and sled, the buoys will be removed and divers will make the connection between the sled manifold and the wellhead via pipe spools. The flowlines then will be cleaned by pigging and hydrostatically tested, as described above for the onshore flowlines. The operation of pulling the lines offshore, positioning the sled, and pressure testing the lines requires about 8 days per well.

Following the successful completion of the above activities and procedures, operation of the system will commence. All activities associated with the operation of the flowline bundle and wellhead system will meet the requirements of the State of California, State Lands Commission "Regulations for Oil and Gas Production Operations on State Tide Submerged Lands (Article 3.4)."

#### Operations.

##### Solino Gas Processing Plant

The well production facilities consist of well manifolds, low temperature high pressure separators, glycol injection and recovery equipment, a hydraulic tree valve control system, a subsurface safety valve hydraulic control system and booster compressors for future use. The gas processing equipment includes gas drying facilities, a stabilizer, compressors, storage tanks, and truck loading equipment (Figure 5).

On May 1, 1984, SCPI temporarily shut-in the one productive gas well, the MS 2920-5. Only minor plant maintenance and repair will be required to resume operations to process the production expected from the two net wells. Anticipated production from the wells is expected to be 20 to 30 MMCFD of natural gas and 500 to 750 B/D of condensate.

##### Flowlines

Onshore processing facilities receive the gas at wellhead pressure from the subsea wells via the 4-inch flowline. The wellhead and subsurface safety valves are held open by applying hydraulic pressure via the control lines. Closure or failure of the system at the plant site, or the accidental severing of the gas flowline results in the automatic shutting-in of the affected well. Glycol is injected at the wellheads in order to prevent hydrate formation in the flowlines. When the pressure

Temperature and water content of natural gas fall within certain ranges, a water-hydrocarbon complex known as "methane snow" may be formed inside pipelines, interfering with efficient transmission. The injected glycol "captures" the water and acts as a hydrate inhibitor. The produced glycol/water mixture flows with the gas via the 4-inch line to the processing plant. It is removed from the production by water knockouts, with the glycol being regenerated and reused and the resultant water vapor vented to the atmosphere.

#### PERSONNEL TRANSPORTATION AND MATERIAL REQUIREMENTS

A construction work force of approximately 20 to 30 persons (including SCPI supervisors) will be involved in both onshore and offshore construction/installation activities. This work force, other than SCPI supervisors, will be contracted from the Santa Barbara-Ventura area. All construction is expected to be completed in approximately 60 days with construction personnel working up to 12 hours per day.

Pipe will be delivered to the onshore staging area at Arroyo Hondo by truck. It is estimated that approximately 26 truck trips will be required (2 truck trips per day for 13 days). Twenty (20) to 30 employee vehicle trips per day are expected throughout the total flowline installation period of approximately 60 days. An average of one light-duty truck trip per day also is anticipated throughout the installation period. On site construction equipment will be restricted to the pipeline corridor, the staging area and a parking area.

No new employment will be created at the Molino gas plant. It is anticipated that five personnel will be required which is the same number that previously operated the plant. The plant will operate 24 hours per day.

#### WASTE MATERIALS AND EMISSIONS

Waste materials generated during the construction phase (60 days) include cleared vegetation from the onshore flowline installation and offshore construction staging area, hydrostatic test water from testing the integrity of the flowlines, and solid waste materials. All materials will be generated in limited quantities and disposed of in an approved manner.

No additional operational waste materials will be generated at the existing gas plant over and above what has been generated by the plant in the past. Air emissions will occur over the construction period resulting from mobile source (i.e., construction equipment, vehicles, and a tug boat). Details on air emissions are available for review, and may be requested from the SLC. Copies have been mailed to the CARB and the APCD.

## SAFETY AND POLLUTION CONTROL SYSTEMS

The permanent subsea production system will be operated remotely from the gas plant. Pressure on the control line from shore holds the downhole safety valve, master valve (used to shut in the well), and wing valve on tubing access line open for flow (see Figure 4). By applicable design, failure of any of the four lines (control, glycol or gas line) will cause the well to shut-in immediately.

## SECURITY

Equipment will be kept on private lands with limited access. One pipeline section will be welded at the beach; all other sections will be welded in the staging area. The beach itself has very restricted access due to bluffs. The area will be patrolled during the night.

## ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION

### INTRODUCTION

Individual environmental impacts of the proposed activities have been assessed in the previous two EIRs prepared by State Lands Commission on lease activities (SLC 1980 and 1984):

1. State Lands Commission, 1980, Draft Environmental Impact Report and Finalizing Addendum, Resumption of Exploratory and Developmental Drilling Operations by the Shell Oil Company, Lease PRC 2920.1 Molino Field, Santa Barbara County, SLC #273 (SCH #79101011).
2. State Lands Commission, 1984, Draft Supplemental Environmental Impact Report and Finalizing Addendum, Resumption of Exploratory Drilling Operations by Shell California Production Inc., Lease PRC 2920.1, Molino Field, Santa Barbara County, SLC #354 (SCH # 83110901).

SLC 1980 assessed environmental impacts of the project related to the aspects of subsea well completion, installation of flowline bundles offshore and onshore, and operation of the Molino gas plant to the level of anticipated production. SLC 1984 assessed environmental impacts from drilling three exploratory gas wells and included subsea geophysical and marine biological surveys in the area of the well sites. All environmental issues pertinent to the proposed activities have been assessed in these previous documents. It is the intent of this section to call out by reference from the previous documents the information on the environmental setting, impacts, and mitigation measures which is particularly pertinent to the

proposed activities. The environmental setting for each issue is essentially referenced from the previous documents; however, the impact analysis from the previous documents is summarized herein. In some cases, the impact information has been updated (for instance, the air quality analysis) to show that impacts assessed previously were at or above levels that are currently projected. All mitigation measures contained in the previous documents pertaining to subsea completions, flowline installation, or plant operation are repeated herein.

A major aspect of SLC 1980 and 1984 not a part of the proposed action is the exploratory drilling activities. Exploratory drilling operations are currently underway on lease PRC 2920.1.

## GEOTECHNICAL

### Setting

The geologic and geophysical setting of the project area, as contained in the EIR on exploration and development drilling (SLC, 1980), provides detailed description of the project area and site features (onshore and offshore) such as regional physiography and bathymetry, geologic history, geologic stratigraphy, earthquake history, and potential for geologic hazards including groundshaking, fault rupture, liquefaction, landsliding, tsunamis, hydrocarbon seeps, turbidity currents, erosion, uplifting and subsidence, and groundwater contamination. This data base was augmented by additional geophysical investigations of alternative drilling sites in the EIR on exploratory drilling (SLC, 1984). Detailed geological characteristics of the project vicinity are discussed on pages 29 to 86 of the SLC 1980 document and pages 3-1 to 3-35 in the SLC 1984 document. Much of this information is necessary to assess drilling impact and therefore is not entirely pertinent to the proposed activity. Most relevant, however, is the setting information on bathymetry, hydrocarbon seeps, groundshaking and slope stability.

### Environmental Impacts

The most significant geologic and geophysical process of concern to the activity is seismic groundshaking (SLC, 1984, page 4-1). A 7.5 magnitude event on the Santa Ynez fault, located about 8.9 km (6.2 miles) from the site, and a 5.9 magnitude quake on the southern frontal fault of the Molino trend would be capable of producing ground accelerations at the site on the order of 0.4 to 0.7 g and would probably have the greatest potential impact on the subsea wellheads and flowline bundles. Such effects could include physical damage to facilities, i.e., flowline rupture, or well blowout. Other potential geologic hazards that were identified in SLC 1980 include construction of flowlines through the gas seep area on the northwest portion of the site, erosion and land sliding impacts during flowline construction

onshore. While these are potential impacts, their significance is minimized through incorporating standard engineering safety precautions as addressed in SLC 1980, p 151-152. Also, flowline bundles will utilize an existing pipeline corridor and easement which will minimize disturbance to previously undisturbed areas. All other geotechnical parameters identified above were determined not to result in significant adverse impacts (SLC 1980, p 153; and 1984, p 4-1).

#### Mitigation Measures

1. Plans and equipment to contend with emergencies such as a well blowout, are already provided for SCPI operations and provide mitigation of the impacts of such occurrences (see Section 5 of SLC, 1980, p 207; and 1984, 5-1).
2. Proper engineering design, considering the maximum credible earthquake, provides sufficient mitigation to protect against adverse impacts from seismic-induced hazards.

#### Setting

A complete description of the existing meteorologic and climatologic setting of the Molino region and lease area is discussed in SLC 1980 pages 86 through 88, and SLC 1984 pages 3-35 through 3-38. Ambient air quality at the project site is most accurately portrayed in SLC 1984. Air quality in the coastal area near the project site is generally excellent. However, the federal ambient air quality standard for ozone has been exceeded on the South Coast, which has resulted in a non-attainment designation for that pollutant.

#### Environmental Impacts

Potential short-term impacts to air quality from offshore drilling and testing and completion activities (including flowline installation), and long term air quality impacts from gas production and processing were included in SLC 1980, pages 154 through 167, and updated in SLC 1984, pages 4-1 through 4-18. Offshore emissions associated with well completion of the present activities will not exceed those considered in 1980 and 1984 because no exploratory drilling with the associated heavy diesel engine loading will occur during these completion activities. In addition, gas plant emissions will not increase over those already permitted by the Santa Barbara County Air Pollution Control District. The calculated emissions associated with the well completion and flowline installation are 47,136 pounds of NO<sub>x</sub>, 2829 pounds of VOC, 11,180 pounds of CO, 3903 pounds of SO<sub>2</sub> and 3256 pounds of TSP. These calculations are available for review from the SLC.

Throughout the exploratory drilling operation (previously approved) and the well completion operation (this request), the mitigation measures already in place for the exploratory drilling program, as covered by the March 7, 1984 APCD "Emissions Offset Agreement", will remain in effect.

### Mitigation Measures

Mitigation measures for air quality impacts were discussed in detail in SLC 1980 Appendix B. Other specific measures identified in SLC 1984 and adopted as a conditional of approval by the Santa Barbara County APCD include the following:

1. A nitrogen oxide emission reduction program was implemented and has achieved a 713 lb/day reduction. The reduction program was accomplished through modifications to compressor gas engine drives and use of an electric driven booster compressor instead of gas engine driven units.
2. SCPI has provided intake air cooling and pre-injection chambers for primary power engines on the drilling rig as well as tuning of the engines to accomplish additional reductions in nitrogen oxides.
3. A monitoring program for nitrogen oxides was implemented by SCPI at a shore location representing a point of maximum impact.
4. Fuel usage records for drilling operations and support vessels was and will continue to be maintained to provide additional documentation for project nitrogen oxide emissions.

At the present time, (10/84) the Molino gas plant is temporarily shut-in. The plant is expected to remain in this mode until the first well is completed and flowlines are installed, or until the existing shut-in remaining Molino No. 5 well is put back into service.

### OCEANOGRAPHY/WATER QUALITY

#### Setting

Physical oceanographic parameters relevant to the project include prevailing currents, wave action, tides and temperature. Chemical water quality parameters of importance include salinity, dissolved oxygen, nutrients, and trace elements. These parameters could be affected by project-related discharges. SLC 1984 provides up-to-date information on these parameters. Overall ocean water quality at the site is presently affected to an insignificant degree by drilling operations on the lease and from naturally occurring phenomenon. SCPI is presently authorized to discharge (National Pollutant Discharge Elimination System (NPDES) permit #CA 60558, renewal approved November 18, 1983) up to 50,000 gallons/day of wastewater into Canada de la Huerta (SLC, 1984).



## Environmental Impacts

Proposed activities will have no significant effect on oceanographic parameters of the Molino area. The physical behavior of currents, tides, and waves in the project area will not be affected, although the sea-state could cause suspension of construction activities offshore. Impacts on water quality have been determined to be minor in nature and in all cases will conform to NPDES permit requirements. Operational emergencies such as a pipeline break or mechanical failure will result in the implementation of emergency response procedures in effect for the SCPI operations.

## Mitigation Measures

No additional mitigation measures are necessary.

## MARINE AND TERRESTRIAL BIOLOGY

### Marine Setting

The unique and varied elements of the marine setting in the project area were initially detailed in SLC 1980 on pages 100 to 122, and were updated with revised information in SLC (1984) pages 3-53 to 3-83. Information on intertidal communities, benthic communities, kelp beds, planktonic communities, and fishes is discussed. Also included is an identification of marine mammals and shore birds and a discussion of unique marine habitats including biologically sensitive areas and rare and endangered species. These aspects would be most affected by construction of flowline bundles offshore.

### Terrestrial Setting

SLC 1980 characterizes the proposed onshore flowline corridor as highly disturbed and dominated by numerous invasive and weedy species (see pages 122 to 125). In the finalizing addendum to SLC 1980, the biological characteristics of the proposed pipeline staging area are identified as largely agricultural (including introduced grasses and an avocado orchard). The area was also disturbed during earlier flowline installation activities (1963). A significant riparian community is associated with the Arroyo Hondo drainage. Overall, the onshore areas serve as good open space habitat for a variety of wildlife. The riparian area adjacent to the staging area provides good bird habitat. No rare or endangered plant or animal species were found (SLC, 1980).

Subsequent to the biological studies done for SLC 980, the construction staging area has experienced expanded avocado production and Highway 101 has been realigned in the project vicinity. An on-foot survey of the flowline corridor in the area of the highway undercrossing and a brief visual inspection of the staging area was accomplished by WESTEC Services, Inc. biologists on July 27, 1984. The following conditions were noted.

The south side of the new highway contains a railroad trestle and the old highway bridge. The vegetation in this area reflects the high amount of past disturbance, being dominated by fennel and other ruderal forms. No biologically sensitive issues occur on the south side.

The north side of the highway consists of a mosaic of disturbed vegetation in the form of agricultural and ruderal elements contiguous to the Arroyo Hondo stream which contains a narrow band of riparian woodland along its length. This riparian woodland is designated as Environmentally Sensitive Habitat by the Santa Barbara County Local Coastal Program (County of Santa Barbara, 1982). Elements contributing to this designation include the existence of mature riparian woodland vegetation and a perennial source of water in the arroyo.

#### Environmental Impacts

##### Marine

The impacts of hydrocarbon production from the lease on the marine environment is detailed in SLC (1980), pages 183-193, and updated for the exploratory phase in SLC (1984), pages 4-29 to 4-36. Impacts from the construction of wellheads and flowline bundles include destruction of some benthos, and disturbance of the surf and shore zone including the intertidal area. The 1983 winter storm (El Niño) destroyed extensive areas of kelp beds and in the Molino area, the beds have not yet recovered. Little if any kelp is expected to be destroyed by the project. No unique marine environments or rare and endangered species would be affected by the project.

Impacts from operation of facilities are largely a function of the potential for a catastrophic event such as a well blowout resulting in gas discharge. The discharge of gas from a well blowout appears to exert the greatest impact on air quality. The severity of the impact is also dependent on the effectiveness of emergency response and cleanup measures. Emergency response is discussed in SLC 1980 pages 205 to 210, and in SLC 1984 pages 5-1 to 5-9.

### Terrestrial

Construction of flowlines and the utilization of the staging area will result in the elimination of affected areas of vegetation. As discussed in SLC 1980, pages 193-194 and C-2, impacts include: 1) disturbance of insignificant vegetation along the majority of the flowline alignment, 2) elimination of some inland, sage scrub habitat which overall is considered insignificant, and 3) disturbance of some riparian habitat on the extreme southern portion of the staging area. The total vegetated area to be disturbed by the pipeline installation is expected 2500 feet long and 20-30 feet wide, principally covered with introduced grasses and low shrubs. One mature willow tree will be removed at the access to the staging area.

The staging activities proposed for the orchard will be of approximately two months duration. These activities will be scheduled outside the breeding season (spring months), therefore significant impacts to sensitive fauna associated with the riparian area will not occur. Nine-hundred foot pipeline sections are to be assembled and pulled through the concrete culvert which serves as outflow of the stream. There is a sufficient existing break in the riparian vegetation to allow this activity without the need for removal of mature trees. Exercising care in this process will eliminate a significant impact. One hundred avocado trees will be removed by cutting off at ground level; These trees will be replanted after the roots have decayed sufficiently to permit replanting.

### Litigation Measures

#### Marine

1. During flowline installation, areas of kelp will be avoided wherever possible, and the area of disturbance will be minimized to the greatest extent practical.
2. Flowline construction will avoid rocky intertidal areas and hard bottom habitat to the maximum extent practical, and the installation through the shore zone will be confined to a localized area. SCPI will work with Keio to avoid disturbing any productive kelp areas.
3. Emergency response measures are discussed in SLC 1980 Section 5.

#### Terrestrial

1. Prior to construction, the specific flowline construction area near Arroyo Honda will be staked out to ensure that the activity will encroach as little as possible into the riparian habitat.

2. Construction workers will be restricted from entering the riparian habitat by the installation of a temporary fence or other barrier.
3. In order to minimize impact to breeding birds, construction will not be conducted during the spring months.
4. A construction corridor to allow pulling of the lines was selected to avoid any damage to mature riparian vegetation.
5. Replanting of the willow tree at point removed will mitigate this impact.
6. SCPI will reimburse the landowner for costs of replanting avocado trees.
7. Heavy construction equipment will be restricted to the pipeline corridor, staging and parking areas.

CULTURAL RESOURCES

Marine Setting

Geophysical survey data and interpretation compiled in SLC 1980 were augmented by additional geophysical and subsea observations of exploratory well locations in SLC 1984. No objects of historical significance were documented through these investigations.

Terrestrial Setting

Literature searches were described and field surveys were detailed concerning the onshore flowline bundle alignment and staging area in SLC 1980, pages 141-147 and Final Addendum Section B. Other significant studies of cultural resources in the general area include surveys by WESTEC Services in conjunction with Chevron's Point Arguello project facilities. (Chevron USA Inc., 1983; WESTEC Services, Inc., 1984). The general area was found to contain objects of cultural significance including prehistoric and historic sites and artifacts. These include the historic adobe house located across Arroyo Hondo creek west of the proposed staging area, a vacant field northwest of the proposed staging area which contained scattered historic debris and prehistoric site SBA-1151 located across U.S. 101, south of the proposed project. Major portions of SBA-1151 located in the center divide of U. S. 101 have recently been removed by Caltrans.

Portions of the proposed staging area were tested for cultural resources during the previous work for Chevron. The archaeological testing program was significantly limited due to insecticide spraying just prior to arrival at the project site. However, disturbed subsurface historic debris were noted. It appears that probable historic artifacts noted within the proposed staging area are related to historic sites within Arroyo Hondo to the west and north, and prehistoric artifacts are related to SBA-1151, located south of U. S. 101 and the proposed project site, and lie under about 3 meters of existing fill on which avocado orchards are located.

### Environmental Impacts

#### Marine

No significant impacts to marine cultural resources have been identified in the previous surveys (SLC 1980, page 199; SEC 1984, page 4-44).

#### Terrestrial

Based on the on-foot surveys of the proposed project area, adverse impacts on terrestrial cultural resources located in the staging area may occur. Disturbed historic and prehistoric artifacts were recorded on the surface within the avocado orchard within Chevron USA's proposed corridor (Chevron USA, Inc., 1983). This area is contained within the southern half of the proposed staging area. As a means of assessing these materials within Chevron's corridor an archaeological test excavation program was implemented. However, just prior to commencement of field work, the orchard was sprayed with insecticide, and the excavation program was limited to shallow postholes (WESTEC, 1984). The postholes revealed scattered subsurface historic artifacts and no prehistoric materials. The historic artifacts may represent significant intact cultural resources; further testing would be required to determine the exact extent and importance of the resources. Nevertheless, artifacts were recorded on the surface in this orchard, and impacts to these and to possibly buried artifacts may occur as a result of tree removal, and subsequent movement of equipment in and out of the staging area.

### Mitigation Measures

#### Marine

No mitigation is necessary.

## Terrestrial

1. The northwest corner of the study area and the area immediately adjacent to the adobe will be avoided for the duration of the project. This avoidance will insure that no adverse impacts are brought upon the historic adobe structure or the historic debris in a vacant field northwest of the staging area. Prior to commencement of the project, these areas of interest will be defined and flagged.
2. Historic and prehistoric artifacts were noted on the surface of the southern half of the proposed staging area with the avocado orchard. Prior archaeological testing in this area indicated a possible subsurface historic deposit with no evidence of a prehistoric deposit. Approximately three meters of fill has been placed on the natural ground surface. Because this fill effectively protects the possible prehistoric site, SCPI proposes not to disturb the fill: avocado trees will be cut down rather than uprooted. The roots left in the ground are expected to decompose over a year so that new trees can be planted at the end of a year without disturbing any buried artifacts.

## SOCIOECONOMICS

### Setting

Regional characteristics on population, housing, and employment, as well as a description of other pertinent activities including petroleum activity and agriculture are presented in SLC 1980, pages 126 to 130, and updated briefly in SLC 1984, pages 3-87 to 3-90. The mining industry, to which petroleum development employment is related, is the smallest employment sector in the county. It is expected to increase, however, with increased exploration and development of resources located in state tidelands and federal OCS lands.

### Environmental Impacts

Because of the relatively small workforce required to construct proposed facilities (20 to 25 persons for a 60-day period) and the even smaller workforce required to operate and maintain the wellheads, flowlines, and gas plant (5 persons), the proposed project will have no significant impact on the socioeconomic factors of population growth, housing availability, employment or income in the local area of Santa Barbara County.

Placement of wellheads and flowlines will temporarily restrict commercial and sport fishing activities in the immediate vicinity of the well sites, but will not represent a significant adverse impact because trawling and other bottom fishing activities are already limited in the area due to existing wellheads and pipelines (SLC 1984; pages 4-48).

Significant impacts on fishing and kelp harvesting activities will occur as a result of an accident or malfunction which results in discharge of gas to the marine environment. The probability of these impacts occurring is greater during well drilling, which is already permitted, than the proposed completion and production activity. The potential for adverse input to occur is significantly lessened through implementation of emergency response measures.

#### Mitigation Measures

1. Measures to contend with operational emergencies are contained in the SCPI Oil Spill Contingency Plan described in SLC 1984, Section 5.
2. SCPI will cooperate with commercial fishermen to the greatest extent practicable, and welcomes suggestions from representatives of the fishing industry on ways in which SCPI may further minimize any potentially adverse project impacts.

#### LAND USE AND COASTAL POLICIES

##### Setting

SLC 1980, pages 130 to 138, described the existing land use setting in the region and project locale. The Santa Barbara County Coastal Plan regulations applicable to the project are also described specifically as they relate to construction of pipelines and construction staging areas. Recreational uses of the coastal zone are identified, as are the existing recreational use areas in close proximity to the project.

The beach area traversed by the flowline alignment is small to non-existent depending upon tide and is not an important use area.

The Arroyo Hondo drainage is designated as an Environmentally Sensitive Habitat area pursuant to the coastal plan. According to Section 30240 of the plan, "Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on such responses shall be allowed within such areas". The plan also states that such designations are based on available information and the appropriateness of the designation in any particular area can be reviewed on a case-by-case basis.

Policy 9-32 of the coastal plan relates to rocky intertidal areas. The policy states in part that shore structures, such as pipelines, should be sited or controlled to avoid significant rocky points and rocky intertidal areas. Generally, rocky intertidal areas between Point Conception and Ellwood have been designated for preserve status although no specific areas have been identified.

The coastal plan contains a general statement about kelp beds, indicating that the County of Santa Barbara has no jurisdiction over kelp beds. It recommends state monitoring of kelp harvesting and other activities such as petroleum development which can impact kelp.

#### Environmental Impacts

The proposed placement of wellheads and construction of flowlines is generally consistent with policies of the Santa Barbara County LCP as discussed in SLC 1980. A temporary disruption of existing agricultural activities may result from construction relating to flowline assembly in the staging area and flowline installation operations along the proposed right-of-way. Temporary disruption of existing beach use at the mouth of Arroyo Hondo will occur during flowline installation. However, the work is proposed for a season with low recreational usage.

The proposed pipeline and staging areas have appropriate zoning and land use designations, although the use of the Arroyo Hondo construction staging site may require the issuance of a Conditional Use Permit from the County of Santa Barbara. The proposed flowline bundle right-of-way may cross a rocky intertidal area, although this area was disturbed by the 1963 flowline installation activities.

#### Mitigation Measures

Construction activities in the shore zone will be confined to existing flowline rights-of-way and previously disturbed areas so as to minimize the possibility of impact to rocky intertidal areas. Because of SCPI's proposal to cut the trees off, rather than uproot them and risk disturbing cultural resources, it will be necessary to wait until the root systems have decayed enough to replant. However, SCPI has agreed to reimburse the land owner for replanting costs.

#### VISUAL RESOURCES

##### Setting

Views of the offshore lease area and onshore proposed facility areas are described in SLC 1980, pages 138-141. The offshore lease area can be seen readily from Highway 101 between El Capitan and Gaviota State Beaches and from most shore areas between those two locations. The pipeline right-of-way is visible from Highway 101 briefly at freeway speed and has limited visibility from beach areas below. The flowline easement between Highway 101 and the beaches lies within a View Corridor Overlay District as designated by the Santa Barbara County Coastal Plan.



Environmental Impacts

The visual impact of project construction is transient; after the 60-day construction period, no long-term significant impacts are expected either onshore or offshore. However, the west-facing ridge at the 60 m elevation would be scarred and would take a longer period of time to revegetate than surrounding areas due to the steepness of the slope.

The proposed project is consistent with the Santa Barbara County Coastal Plan policies related to visual resources. Therefore, no impact to the plan is anticipated from project implementation.

Mitigation Measures

No significant visual impacts are anticipated. However, SCPI will institute revegetation of the west facing ridge with "like" vegetation which will diminish grading impacts more quickly.

CONTINGENCY PLANNING AND EMERGENCY RESPONSE

SCPI's emergency response procedures pertinent to the proposed activity are detailed in SEC 1980 and 1984, Section 5. The organization and equipment for emergency response is maintained in a state of readiness for an emergency event throughout the project life including the complete production phase. In addition to the equipment aboard the drilling vessel, which would be used during installation activities, SCPI is a member of Clean Seas Inc. This allows them access to the complete response capability of Clean Seas including the Mr. Clean Y. Clean Seas has equipment based on the Getty property approximately 4 miles to the west. The response time of Mr. Clean to the project site is two hours.

## EFFECTS JUDGED NOT TO BE SIGNIFICANT

The content of the previous EIRs pertaining to drilling and production activities on PRC 2920.1 (SLC: 1980, 1984), was focused on the issues of significance as determined by the California State Lands Commission. All other environmental issues were determined to be insignificant.

One issue discussed in SLC (1980 and 1984) but not discussed herein is the issue of Marine Traffic and Navigation. This section focuses on marine hazards imposed by location off the drilling rig on the leasehold and as such is not applicable to the proposed action.

Additionally, the issue of traffic and circulation impacts have been evaluated for possible significance and inclusion in this environmental study. Project-related traffic will be heaviest during the approximate 60-day construction period. Traffic will consist of two heavy-duty truck trips to the site per day for 15 days, one light-duty truck trip to the site per day for 60 days, and up to 30 employee light-duty vehicle trips per day for 60 days.

After construction, traffic will consist of up to five employee light duty vehicle trips per day and five to six truck trips per day to remove condensate products (i.e., propane, butane and natural gasoline). This level of traffic will decline over time.

Historically, Molino plant truck traffic has varied from a high of six to seven trips per day between 1964 and 1981, to eight trucks per month between 1981 and 1984.

The Caltrans Santa Barbara District Office was contacted to obtain the most recent traffic volume information for Highway 101 in the project area. At the El Capitan State Beach interchange, 1982 traffic volumes averaged 17,000 ADT (Averaged Daily Traffic). Peak day traffic was estimated at 25,500 ADT. No breakdown of truck traffic percentage was available.

The addition of 66 ADT during construction and 23 ADT during operations is considered an insignificant increase and results in no adverse impact.

ENVIRONMENTAL IMPACT ASSESSMENT CHECKLIST - PART II

Form 13-89 (1-83)

File Ref.: W-40412

I. BACKGROUND INFORMATION

A. Applicant: Shell California Production, Inc.
P.O. Box 11164
Bakersfield, CA 93389

B. Check Date: 10/24/84

C. Contact Person: Susan Livenick
Telephone: (213) 590-5201 (RTSS: 635-5201)

D. Purpose: Development of natural gas field

E. Location: Molino area, Santa Barbara County

F. Description: Completion of previously approved exploratory wells and installation of flowlines from subseawellheads to onshore gas processing facility.

G. Persons Contacted: Jim Ragland, Shell California Production, Inc.
Mike Wright, WESTEC services, Inc.
Sharon Maves, County of Santa Barbara
Mary Ann Scott, County of Santa Barbara

II. ENVIRONMENTAL IMPACTS. (Explain all "yes" and "maybe" answers)

A. Length. Will the proposal result in:

Yes Maybe No

- 1. Unstable earth conditions or changes in geologic substructures?
2. Disruptions, displacements, compaction, or overcovering of the soil?
3. Change in topography or ground surface relief features?
4. The destruction, covering, or modification of any unique geologic or physical features?
5. Any increase in wind or water erosion of soils, either on or off the site?
6. Changes in deposition or erosion of beach sands, or changes in siltation, deposition or erosion which may modify the channel of a river or stream or the bed of the ocean or any bay, inlet, or lake?
7. Exposure of all people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?

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MINUTE PAGE 498

B. *Air.* Will the proposal result in:

Yes Maybe No

- 1. Substantial air emissions or deterioration of ambient air quality?
- 2. The creation of objectionable odors?
- 3. Alteration of air movement, moisture or temperature, or any change in climate, either locally or regionally?

C. *Water.* Will the proposal result in:

- 1. Changes in the currents, or the course or direction of water movements, in either marine or fresh waters?
- 2. Changes in absorption rates, drainage patterns, or the rate and amount of surface water runoff?
- 3. Alterations to the course or flow of flood waters?
- 4. Change in the amount of surface water in any water body?
- 5. Discharge into surface waters or in any alteration of surface water quality, including but not limited to temperature, dissolved oxygen or turbidity?
- 6. Alteration of the direction or rate of flow of ground waters?
- 7. Change in the quantity of ground waters, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations?
- 8. Substantial reduction in the amount of water otherwise available for public water supplies?
- 9. Exposure of people or property to water-related hazards such as flooding or tidal waves?
- 10. Significant changes in the temperature, flow or chemical content of surface thermal springs?

D. *Plant Life.* Will the proposal result in:

- 1. Change in the diversity of species, or number of any species of plants (including trees, shrubs, grass, crops, and aquatic plants)?
- 2. Reduction of the numbers of any unique, rare or endangered species of plants?
- 3. Introduction of new species of plants into an area, or in a barrier to the normal replenishment of existing species?
- 4. Reduction in acreage of any agricultural crop?

E. *Animal Life.* Will the proposal result in:

- 1. Change in the diversity of species, or numbers of any species of animal: (birds, land animals including reptiles, fish and shellfish, benthic organisms, or insects)?
- 2. Reduction of the numbers of any unique, rare or endangered species of animals?
- 3. Introduction of new species of animals into an area, or result in a barrier to the migration or movement of animals?
- 4. Deterioration to existing fish or wildlife habitat?

F. *Noise.* Will the proposal result in:

- 1. Increase in existing noise levels?
- 2. Exposure of people to severe noise levels?

G. *Light and Glare.* Will the proposal result in:

- 1. The production of new light or glare?

H. *Land Use.* Will the proposal result in:

- 1. A substantial alteration of the present or planned land use of an area?

I. *Natural Resources.* Will the proposal result in:

- 1. Increase in the rate of use of any natural resources?
- 2. Substantial depletion of any nonrenewable resources?

J. Risk of Upset. Does the proposal result in:

Yes Maybe No

- 1. A risk of an explosion or the release of hazardous substances (including, but not limited to, oil, pesticides, chemicals, or radiation) in the event of an accident or upset conditions?
- 2. Possible interference with emergency response plan or an emergency evaluation plan?

K. Population. Will the proposal result in:

- 1. The alteration, distribution, density, or growth rate of the human population of the area?

L. Housing. Will the proposal result in:

- 1. Affecting existing housing, or create a demand for additional housing?

M. Transportation/Circulation. Will the proposal result in:

- 1. Generation of substantial additional vehicular movement?
- 2. Affecting existing parking facilities, or create a demand for new parking?
- 3. Substantial impact upon existing transportation systems?
- 4. Alterations to present patterns of circulation or movement of people and/or goods?
- 5. Alterations to waterborne, rail, or air traffic?
- 6. Increase in traffic hazards to motor vehicles, bicyclists, or pedestrians?

N. Public Services. Will the proposal have an effect upon, or result in a need for new or altered governmental services in any of the following areas:

- 1. Fire protection?
- 2. Police protection?
- 3. Schools?
- 4. Parks and other recreational facilities?
- 5. Maintenance of public facilities, including roads?
- 6. Other governmental services?

O. Energy. Will the proposal result in:

- 1. Use of substantial amounts of fuel or energy?
- 2. Substantial increase in demand upon existing sources of energy, or require the development of new sources?

P. Utilities. Will the proposal result in a need for new systems, or substantial alterations to the following utilities:

- 1. Power or natural gas?
- 2. Communication systems?
- 3. Water?
- 4. Sewer or septic tanks?
- 5. Storm water drainage?
- 6. Solid waste and disposal?

Q. Human Health. Will the proposal result in:

- 1. Creation of any health hazard or potential health hazard (excluding mental health)?
- 2. Exposure of people to potential health hazards?

R. Aesthetics. Will the proposal result in:

- 1. The obstruction of any scenic vista or view open to the public, or will the proposal result in the creation of an aesthetically offensive site open to public view?

S. Recreation. Will the proposal result in:

- 1. An impact upon the quality or quantity of existing recreational opportunities?

Yes Maybe No

T. Cultural Resources

- 1. Will the proposal result in the alteration of or the destruction of a prehistoric or historic archeological site?
- 2. Will the proposal result in adverse physical or aesthetic effects to a prehistoric or historic building, structure, or object?
- 3. Does the proposal have the potential to cause a physical change which would affect unique ethnic cultural values?
- 4. Will the proposal restrict existing religious or sacred uses within the potential impact area?

U. Mandatory Findings of Significance

- 1. Does the project have the potential to degrade the quality of the environment, reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
- 2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?
- 3. Does the project have impacts which are individually limited, but cumulatively considerable?
- 4. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

III. DISCUSSION OF ENVIRONMENTAL EVALUATION (See Comments Attached)

See following discussion

IV. PRELIMINARY DETERMINATION

On the basis of this initial evaluation:

- I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A NEGATIVE DECLARATION will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

Date: 1/1/81

For the State Lands Commission

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### III. Discussion of Environmental Evaluation

#### Section II

A-2, 3: Some temporary disturbance of the soil and minor changes in the ground surface will result from the pipeline construction and trenching onshore and through the surf zone. These impacts will be minor and of short duration.

B-1: Some air emissions will be generated by onshore construction machinery, lay barges and marine vessel activity. This impact to air quality will be of temporary duration.

S-1, 4: There will be impacts to the existing biota and any existing kelp beds by the construction for the period of time to construct and lay the pipeline. These impacts will be of limited duration and recolonization of the areas will occur. Any blasting in the water may require permitting and/or coordination with Fish and Game Commission.

F-1; G-1: There will be an increase in ambient noise and light levels in proximity to the tug and lay barge and welding equipment. This impact should be minor and of short duration.

M-1, 5; S-1: Additional water borne traffic will be temporarily generated between the onshore facility and the well heads during the construction of the pipeline. This activity will impact usage and navigation on the coastal waters.

The pipeline laying activities will be governed by rules and regulations of the U.S. Coast Guard so as to minimize interference with fishing, boating and hazards to navigation. The installation activities will be restricted to area immediately around the pipelaying boat or barge and will be of brief duration. Recreational boating in the pipeline laying area will be restricted and controlled by Coast Guard regulation for the duration of the project.



AIR RESOURCES BOARD  
 ATTN ANN GERAGHTY  
 1302 O STREET  
 SACRAMENTO, CA 95814

DEPT. OF BOATING & WATERWAYS  
 ATTN BARBARA KIERBOW  
 1629 S. STREET  
 SACRAMENTO, CA 95814

CALIFORNIA COASTAL COMM.  
 ATTN TOM LOBIN  
 631 HOWARD ST., 4TH FLOOR  
 SAN FRANCISCO, CA 94105

CALIFORNIA COASTAL COMMISSION  
 ATTN JAMES JOHNSON  
 755 STATE STREET  
 BALBOA BUILDING  
 SANTA BARBARA, CA 93101

CALIFORNIA ENERGY COMM.  
 ATTN GREG NEWHOUSE  
 1516 NINTH ST., ROOM 200  
 SACRAMENTO, CA 95814

DEPT. OF CONSERVATION  
 ATTN DENNIS O'BRYANT  
 ENV. PROG. COORD.  
 1416 NINTH ST., ROOM 1354  
 SACRAMENTO, CA 95814

OFFICE OF HISTORIC PRESERVATION  
 ATTN NICK DEL CIOFFO  
 1220 K STREET MALL, 3RD FLOOR  
 SACRAMENTO, CA 95814

DEPT. OF PARKS & RECREATION  
 ATTN MAURICE "LUD" GETTY  
 1220 K STREET MALL, 3RD FLOOR  
 SACRAMENTO CA 95814

HONORABLE GARY L. HART  
MEMBER OF THE SENATE  
18TH DISTRICT  
CALIFORNIA STATE LEGISLATURE  
STATE CAPITOL  
SACRAMENTO, CA 95814

STATE WATER RESOURCES  
CONTROL BOARD

ATTN PHIL ZENTNER  
1416 NINTH STREET  
SACRAMENTO, CA 95814

U. S. FISH & WILDLIFE SERVICE  
2500 COTTAGE WAY  
SACRAMENTO, CA 95825

U.S. ENVIR. PROTECTION AGENCY  
AIR & HAZARDOUS MATERIALS DIV  
215 FREMONT STREET  
SAN FRANCISCO, CA 94105

MINERAL MANAGEMENT SERVICE  
OFFSHORE OIL & GAS SUPERVISOR  
1340 W. SIXTH ST., RM. 160  
LOS ANGELES, CA 90047

DEPT. OF ENVIRONMENTAL QUALITY  
SANTA BARBARA COUNTY  
ATTN DIANE GUZMAN, DIRECTOR  
105 E. ANAPAMU STREET  
SANTA BARBARA, CA 93101

AIR POLLUTION CONTRL DISTRICT  
SANTA BARBARA COUNTY  
ATTN JOHN ENGLISH  
315 CAMINO DEL REMEDIO  
SANTA BARBARA, CA 93110

RESOURCES MANAGEMENT DEPARTMENT  
ATTN PHIL OVERMYER  
ENERGY DIVISION  
123 E. ANAPAMU ST.  
SANTA BARBARA, CA 93101

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SOLID WASTE MANAGEMENT BOARD  
ATTN: ERIC MAHER  
1020 NINTH STREET, ROOM 306  
SACRAMENTO, CA 95814

DEPT. OF WATER RESOURCES  
ATTN: KEN FELLOWS  
1415 NINTH ST., ROOM 215-1  
SACRAMENTO, CA 95814

REG. WATER QUALITY CONTROL BD  
ATTN: KENNETH K. JONES, EX. DIR.  
CENTRAL COAST REGION (3)  
1152A LAUREL LANE  
SAN LUIS OBISPO, CA 95401

DEPT. OF FISH & GAME  
ATTN: F. A. WORTHLEY, JR.,  
REGIONAL MANAGER  
245 W. BROADWAY, SUITE 350  
LONG BEACH, CA 90802

DEPT. OF FISH & GAME  
ATTN: ROLE E. HALL  
MARINE RESOURCES REGION  
245 W. BROADWAY, SUITE 350  
LONG BEACH, CA 90802

DIVISION OF OIL & GAS  
ATTN: SI CORDOVA  
1416 NINTH STREET, ROOM 1316  
SACRAMENTO, CA 95814

DEPT. OF JUSTICE  
ATTN: N. GREGORY TAYLOR  
5580 WILSHIRE BLVD.  
LOS ANGELES, CA 90010

OFFICE OF PLANNING & RESEARCH  
ATTN: CHRIS GOUGHIN  
1400 10TH STREET  
SACRAMENTO, CA 95814

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10/23/84

HONORABLE JACK O'CONNELL  
MEMBER OF THE ASSEMBLY  
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STATE CAPITOL  
SACRAMENTO, CA 95814

DEPT. OF TRANSPORTATION  
ATTN JERRY LAUNER  
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501 HIGUERA ST  
SAN LUIS OBISPO, CA 93403

COMMANDER, U.S. COAST GUARD  
DISTRICT  
400 OCEANGATE  
LONG BEACH, CA 90802

ENVIRONMENTAL RESOURCES AGENCY  
VENTURA COUNTY  
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600 S. VICTORIA AVENUE  
VENTURA, CA 93009

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SANTA BARBARA, CA 93101

AIR POLLUTION CONTROL DISTRICT  
SANTA BARBARA COUNTY  
ATTN CRAIG STROMMEN  
515 CASINO DEL REMEDIO  
SANTA BARBARA, CA 93110

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STATE DEPT. OF HEALTH  
ATTN HARVEY COLLINS  
714 P STREET, ROOM 430  
SACRAMENTO, CA 95814

UNIVERSITY OF CALIFORNIA  
AT SANTA BARBARA  
ATTN CHANCELLOR'S OFFICE  
CHAMPLAIN HALL  
SANTA BARBARA, CA 93106

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ATTACHMENT 1

COMMENTS TO INITIAL STUDY  
AND RESPONSES

DEPARTMENT OF FISH AND GAME  
CALIFORNIA COASTAL COMMISSION  
COUNTY OF SANTA BARBARA  
U.S. FISH AND WILDLIFE SERVICE

ADDED 01/30/85

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# Memorandum

To : Ms. Susan Livenick  
 State Lands Commission  
 245 West Broadway, Suite 425  
 Long Beach, California 90802

Date: November 26, 1984

DATE	NOV 30 1984
3 DJE	<i>[Signature]</i>
CFB	
ADW	<i>[Signature]</i>
RGF	
4 [Signature]	
W40442	

From : Department of Fish and Game

- MRR-LB

*Susan - if they don't help, why not have revegetation taken immediately? Why wait 2 years?*

Subject: Notice of Consultation/Preparation for Well Completion, Installation of Flowlines and Production of Gas, Shell California Production Inc. P.R.C. 2920.1, Santa Barbara County. W40442, SCH 84101008.

We have reviewed the Initial Study for the completion of two previously approved wells, installation of flowlines and the production of gas. We believe that a Negative Declaration, which includes appropriate mitigation measures to offset potential impacts, would be appropriate.

The Initial Study identifies the major project impacts to both marine and terrestrial habitats and provides some mitigation measures which will be included in the proposed project. These measures will provide mitigation for most project impacts. However, with respect to marine and terrestrial habitats we have additional concerns.

Although the 1983 winter storm and warm water conditions caused an extensive reduction in kelp beds in the Molinc area, recovery of those kelp beds has been observed. The pulling of flowline bundles through recovering or established kelp beds would impact this resource. We therefore recommend that the project be conditioned to provide for a pre-project survey of the area to establish kelp densities and a survey upon project completion be completed to determine the magnitude of kelp loss, if any. If there is no kelp loss, or it is insignificant as determined by a review of survey results by Department personnel, then no additional surveys or measures will be required. However, if the loss of kelp is judged to be significant then a survey of the area should be conducted two years after project completion to determine if kelp has returned to pre project densities. If the kelp has not returned to pre project densities then Shell California Production Inc. should revegetate the impacted area.

With regards to the onshore pipeline route, the following conditions would eliminate or reduce potential project impacts to terrestrial and aquatic habitats.

- a) Any loss of riparian vegetation within the pipeline corridor should be avoided. If riparian vegetation is lost it should be replaced with native species.


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- b) No construction activities within Arroyo Hondo creek should be undertaken during the nesting season.
- c) A notification pursuant to Fish and Game Code Section 1603 must be submitted to the Department prior to the initiation of construction activities within Arroyo Hondo. We believe that all of our concerns can be addressed within an agreement with the Department.

Should you have any questions please contact Rolf Mall, Environmental Services Supervisor. His phone number is AT3S 8-635-5155 or (213) 590-5155.

Sincerely,

  
John L. Baxter  
Regional Manager  
Marine Resource Region

cc: Office of Planning and Research,  
1400 Tenth Street  
Sacramento, CA 95814

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State of California ~~DEPARTMENT OF OCEANOGRAPHY~~  
George Deukmejian, Governor

California Coastal Commission  
SOUTH CENTRAL COAST DISTRICT  
735 State Street, (805) 963-6871  
Balboa Building, Suite 612  
Santa Barbara, CA 93101

December 6, 1984

Office of Planning and Research  
Attn: Chris Goggin  
1400 10th Street  
Sacramento, CA 95814

Susan Livenick  
State Lands Commission  
245 West Broadway, Suite 425  
Long Beach, CA 90802

RE: Comments on Initial Study, Shell Molino Flowlines, Santa Barbara County

Dear Ms. Goggin:  
Ms. Livenick:

The following are Coastal Commission staff comments on the Shell Molino Flowline Initial Study. We hope these comments will assist you in the review of the coastal and environmental issues raised by the proposed project. We understand that the proposed project consists of installing flowlines from two offshore gas wells through the Arroyo Hondo Creek Channel beneath the railroad tracks and Highway 101, and then east to the Shell Molino Canyon gas processing facility. A pipeline construction staging area will be established in an avocado grove within Molino Canyon on the landward side of Highway 101. In an effort to assist reviewing agencies and the public, quoted portions of referenced documents should be included as a xeroxed appendix. The comments are listed as follows:

OCEANOGRAPHY/WATER QUALITY page 18,20

What is the basis and justification for the conclusion that the proposed activities will have no significant effect on oceanographic parameters in the Molino area? Does this statement include the fact that Shell is proposing to discharge significant quantities of waste water into Molino Creek which drains into the ocean? How much waste water will be discharged? Why were impacts on water quality determined to be minor? Should an ocean discharge monitoring program be required as appropriate mitigation?

MARINE AND TERRESTRIAL BIOLOGY page 20,21,

Marine Setting

Santa Barbara County Coastal Plan includes a set of adopted Environmentally Sensitive Habitat Area (ESHA) maps which locate and designate such habitat for special protection in Coastal Plan policies. Such identification for kelp beds should be noted in the document. Has a biological survey been conducted with remote controlled vehicles to create accurate maps and

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photographs along the pipeline alignment? Have the kelp beds along the proposed pipeline alignment been surveyed to determine the length, width, and density of the beds? Will blasting with explosives be required to create the pipeline trench? If so what are the effects on marine life including kelp?

What are the adverse effects of less than catastrophic events such as pipeline or wellhead leaks, or potential leaks caused by vessel anchors? Where and in how many locations will the automatic and manual shutoff valves be installed? Are they adequate to mitigate adverse impacts on marine and terrestrial habitats?

What are the construction vessel impacts on the ocean floor, kelp beds, and marine life? Are vessel route plans, debris removal, and the recontouring of ocean floor necessary as mitigation measures? Consistent with Coastal Act and County Coastal Plan consolidation policies, what is the potential to consolidate offshore gas pipelines as short and long term mitigation measures to reduce impacts on marine habitat? Pipeline consolidation would be most effective in the nearshore kelp bed areas.

#### Terrestrial Setting page 22,23

The document notes a concern that the project needs to avoid the spring breeding season for sensitive fauna. What are these species and their significance? Are they rare and endangered? Specifically when is their prime and general breeding season? It is important to balance this concern with the need to avoid the high rainfall and commercial fishing seasons. In order to evaluate the significance of this breeding season additional information is necessary.

Project construction will remove the vegetation cover in the avocado grove and along a portion of the creek bed and create the potential for significant erosion and sedimentation into the creek and marine environment. What are the quantities and adverse impacts created by the sediment load? The riparian corridor along Molino Creek is identified as an ESHA area. It is important to note that although habitat along the creek may have been disturbed in the past it can be restored. Mitigation number 2 should exclude mechanized construction equipment and storage from the riparian habitat area.

#### CULTURAL RESOURCES page 23,24,25

What is the relative cultural significance of SBA-1151? Terrestrial mitigation measure number 2 notes that cut trees will be left in the ground to decompose. Will the planting of new trees and the removal of the decomposing roots have the potential to impact buried cultural resources? Should an archaeological monitoring program during tree planting and removal be required as a mitigation measure?

#### SOCIOECONOMICS page 25,26

What and where are the existing ocean floor obstructions in the project vicinity? Can these be mitigated to enhance the commercial fishing viability for trawlers and trappers? What types of commercial fishing occur in the area and have the commercial fisherman been asked when they fish the area? When are their legal seasons and when are they most likely using the waters in the project vicinity? What mitigation measures can mitigate the adverse impacts? The attached general policy statement on conflicts between the commercial fishing and oil and gas industries may help in defining these

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impacts. How much and what is the significance of recreational boating restrictions to be imposed by the Coast Guard during pipeline construction?

LAND USE AND COASTAL POLICIES page 26,27

Coastal Plan policies need to be listed and analyzed relative to the project in the text of this document. Recreational uses and revised attendance records for the State Parks need to be included. What is the size of the beach area at low and high tides? The rocky intertidal areas in the vicinity of the project site need to be identified and mapped per Coastal Plan policy 9-1 page 120.

The proposed onshore pipeline and creation of the staging area will also require a coastal development permit from the County which is appealable to the Coastal Commission. Pipeline installation and wellhead connections offshore require a coastal development permit from the Coastal Commission.

VISUAL RESOURCES page 27,28

Vegetation of the onshore pipeline route along visible areas should be required as a mitigation measure. Will project construction occur at night? Are there any impacts on residents and visitors from night lighting and construction noise?

CONTINGENCY PLANNING AND EMERGENCY RESPONSE page 29

The emergency response procedures should be included as an appendix to this document. What is the effectiveness of these response procedures in dealing with potential emergencies during various weather and sea conditions?

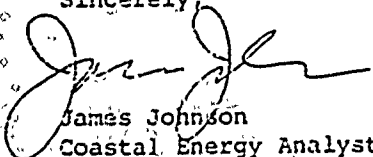
EFFECTS JUDGED NOT TO BE SIGNIFICANT page 30

What are the projected petroleum by products (NGL, LPG, sulphur) generated by the Molino Plant? What are the respective quantities? What are the cumulative impacts and numbers of such truck transportation from existing and proposed gas plants along the highway 101 corridor? What is the likelihood that a NGL/LPG pipeline will be constructed in the project vicinity to an appropriate market destination? Are those cumulative impacts significant and should an NGL/LPG be required as a mitigation measure?

Does the project propose any helicopter activity during construction? If so how can it be mitigated?

Thank you for the opportunity to provide comments on this document. Should you have any questions please call.

Sincerely,

  
James Johnson  
Coastal Energy Analyst

cc: Mary Ann Scott  
John Hallett

jj

ADDED 01/30/85

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PAGE	513

STATE LANDS COMMISSION  
245 WEST BROADWAY, SUITE 425  
LONG BEACH, CALIFORNIA 90802  
TELEPHONE:



File Ref.: W 40442

December 31, 1984

James Johnson  
Energy Division  
California Coastal Commission  
735 State Street  
Santa Barbara, CA 93101

Dear James:

Thank you for your comments on the recent Initial Study (SCH# 84101008) on the SCPL Molino field gas well completion and flowline installation. Attached are responses to your comments. I hope these responses are of some use to you in your own review of the project.

I want to thank you for your courteous and cooperative attitude during this review. Please call me if I can be of help.

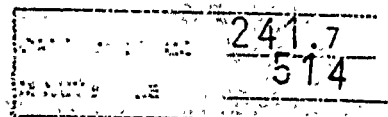
Very truly yours,

SUSAN R. LIVENICK  
Associate Mineral  
Resources Engineer

SRL:vn

Attachment

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## RESPONSE TO CALIFORNIA COASTAL COMMISSION COMMENTS

### Oceanography/Water Quality

#### 1. Basis and Justification for the conclusion of no significant effect on oceanographic parameters-

Response: Because the project facilities offshore will be located subsea, they are not susceptible to conditions of seastate which can affect some offshore operations, (platform operations for instance). Nor are there any effects or changes that the activity would cause to parameters such as tides, currents, or waves.

#### 2. Does statement of no impact include consideration of proposed discharge of significant quantities of waste water into Molino Creek which drains into the ocean? How much wastewater will be discharged? Why were impacts determined to be minor?

Response: The discharge of wastewater from the Molino Gas Plant is to Canada de la Huerta, and is governed by an existing NPDES permit issued by the Regional Water Quality Control Board. The quantity of effluent discharged to the environment (which is limited to 50,000 gallons per day) and pollutant limits established for the discharge will not be exceeded by the proposed activity. The discharge permit establishes effluent limits which will protect water quality and meet regional goals. Thus no significant adverse impact from the discharge will occur.

As part of the recent NPDES permit renewal, the Regional Water Quality Control Board has required SCPI to cease discharging effluent to the Canada de la Huerta and to utilize an ocean outfall. SCPI is presently in the process of permitting two of the abandoned flowlines for use as outfalls. The Regional Board is reviewing operating parameters and dispersion characteristics of the proposed outfall to ensure that ocean plan water quality standards will be met. Effluent discharge will continue to be limited to 50,000 gallons per day.

#### 3. Should an ocean discharge monitoring program be required as appropriate mitigation?

Response: The permit process for the outfall is being handled as a separate action, since such action would be required whether or not the proposed activity is permitted (ie. SCPI could produce gas from existing well #5). Any requirements for discharge monitoring will be established by the Regional Board as a result of their action to permit the outfall.

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## Marine and Terrestrial Biology

1. Marine Setting: Kelp beds should be noted as an Environmentally Sensitive Habitat.

Response: The LCP does designate kelp beds as an environmentally sensitive habitat.

2. Has a biological survey of the pipeline alignment been conducted? Have the kelp beds been surveyed to determine the length, width, and density of the beds?

Response: Subsea surveys along the flowline alignment have been conducted by SCPI. A synopsis of the survey results concerning kelp is given in a 12-4-84 letter to SCPI from Westec Services, which is attached for your information. The bulk of the kelp occurs between 600 and 2500 feet from shore. Thus, the substantial portion of the kelp bed (macrocystis) will not be affected by excavation of flowlines through the shore zone.

3. Will blasting with explosives be required to create the pipeline trench? If so what are the effects on marine life including kelp?

Response: SCPI has evaluated the trenching area and believes that the pipeline trenching can be completed without the use of explosives.

4. What are the adverse effects of less than catastrophic events such as pipeline or wellhead leaks? Where and how many locations will the automatic and manual shutoff valves be installed? Are they adequate to mitigate adverse impacts?

Response: SCPI has a preventive maintenance program which makes pipeline or wellhead leaks highly unlikely. Automatic and manual shutoff valves are located throughout the system and will shut the system in for even the most minor shift in pressure. The resource is a sweet gas not a crude oil. Therefore, the only impact from a leak would be minor air quality impact from the fugitive release. However, it should be emphasized that the system will shut in for even minor leaks which makes an impact very temporary in nature and insignificant.

5. What are the construction vessel impacts on the ocean floor, kelp beds, and marine life? Is mitigation required?

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Response: SCPI will minimize any anchor scarring from construction vessels by limiting the number of vessel movements to three. Construction vessels will not anchor in the kelp beds and pipelines will be consolidated when pulled through the kelp beds to minimize long term impacts. The State Lands Commission will require SCPI to lower and raise the anchor with a vertical motion in order to minimize drag. After the construction, SCPI will survey the area for debris and scarring. SCPI will remove all debris from the project area. If the specific areas of anchor scar remain, which may create a problem for the fishing industry, SCPI will recontour the particular area.

### Terrestrial Setting

1. What are the species of breeding birds and their significance? Are they rare or endangered? Specifically when is their breeding season?

Response: The specific species found in the area are listed in Appendix C of the Development Plan Application. As noted in that Appendix, none of the species are considered to be rare or endangered. The breeding season is variable, depending on weather conditions, in terms of both the overall season and the peak of the season. General patterns vary according to the Santa Barbara County Natural History Museum. It is estimated that the season would run roughly from May to July with a peak in the month of June in the project area.

2. What are the quantities and adverse impacts created by the sediment load from increased erosion? The riparian corridor along Molino Creek (Sp.) is identified as an ESH area. Mitigation 2 should exclude mechanized construction equipment and storage from the riparian area.

Response: There will be no increased erosion or sedimentation from the project. The avocado grove is not presently protected with a ground cover. Stability in the grove will be maintained by leaving the root systems in place. Other than the removal of one small willow tree in the Arroyo Hondo Creek there will be no vegetation removal that would lead to increased erosion. Further, the willow will be cut back to ground level to retain the rock system and allow regeneration to prevent erosion. As noted in the Development Plan, the only activity planned in the ESH area is the placement of roller supports to keep the pipe during its pull, off the creek bottom thereby reducing impact. Mechanized equipment and storage will be contained in the upper reaches of the staging area which maintains a 75 foot buffer from the ESH area. The one tree will be cut off in such a manner that it will re-sprout.

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### Cultural Resources

1. What is the relative significance of SBA-1151? Will the planting of new trees and the removal of the decomposing roots have the potential to impact buried cultural resources? Is an archaeological monitoring program required during tree planting and removal?

Response: SBA-1151 is a site of significance to the Chumash Indians. However, it is not located within the project area and, as noted in the Initial Study, has been disturbed during the recent relocation of Highway 101.

There are no trees proposed for removal or planting. The avocado trees will be cut just above ground level and the root systems left in place. This will avoid any subsurface disturbance. No monitoring program is therefore necessary.

### Socioeconomics

1. What and where are the existing ocean floor obstructions in the project vicinity?

Response: SCPI has removed the wellheads below the mud line on four of the five existing wells. This has been done in accord with Department of Oil and Gas Regulations. The fifth well is temporarily shut in but SCPI intends to bring it back on line in the future. The flow bundles for the four abandoned wells have been left in place and presently support various types of marine life. The fifth flow bundle is being used to bring production from the remaining well to shore.

2. Can these be mitigated to enhance the commercial fishing? What types of fishing occur in the area? What are the legal seasons?

Response: SCPI works closely with the fishing industry to avoid conflicts of use. The lease area is primarily used for lobsters, crabbing and halibut. The industry is used to the sub sea completions and should not be adversely impacted by the installation of the two new wells. The season closed for halibut fishing is March 14 to June 16; for crab, is July to November; and for lobster, is March 15 to October 15. State Lands will require that SCPI notify commercial fishermen, in a manner consistent with the geophysical notice procedure, of its activities on tide and submerged lands.

3. How much and what is the significance of recreational boating restrictions to be imposed by the Coast Guard during pipeline construction?

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Response: SCPI and its contractors will comply with all Coast Guard regulations regarding vessel warning system (lights) and notice to mariners procedures. These have served in the past to minimize any potential conflicts with recreational boating. Further, the procedure for pulling the pipelines is designed to reduce the time on site for construction equipment. Total construction time is 15 days per well, a significantly shorter period than the recently approved Phillips program on the adjoining lease.

#### Visual Resources

1. Revegetation of the onshore pipeline route along visible areas should be required as a mitigation measure. Will project construction occur at night? Are there any impacts on residents and visitors from night lighting and construction noise?

Response: SCPI intends to hydroseed the onshore pipeline right-of-way after construction is completed to accelerate the revegetation process.

Night construction will be required during the 15 day period needed to pull the pipeline into place. Lighting will be required on the beach and at the southern end to the staging area to allow the 900 foot sections to be welded together and to the skid (a one time beach weld).

The lighting will not be visible from the highway (either west or east bound lanes). There is only one resident in the project area, the ranch manager for the Hollister property. His house is screened from the staging area by dense vegetation in the Arroyo Hondo Creek bed. The structure is approximately 200 yards away from the location where the sections will be welded together which will mitigate the minimal noise of the operation.

#### Effects Judged Not to be Significant

1. What are the project petroleum by products generated by the Molino plant? What are the respective quantities?

Response: The proposed project involves the construction of flowlines; the processing of the gas has already been approved. The facility will generate 500-750 barrels per day of condensate products (i.e. propane, butane, and natural gasoline). These will be removed by four trucks per day. This is sweet gas resource; there will be no sulfur generated.

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SCPI is aware of the sensitivity of the County and State regarding the transportation of these products by truck. As such, SCPI would participate in the Chevron study assessing the feasibility of a pipeline to transport the product.

2. Does the project propose any helicopter activity during construction? If so, how can it be mitigated?

Response: There will be approximately four trips per day during construction. This is not considered to be a significant impact and therefore does not require mitigation.

#### Land Use and Coastal Policies

1. Coastal Plan Policies need to be listed and analyzed relative to the project.

Response: Additional Coastal Plan Policies relative to the activity have been analyzed in response to comments of the County of Santa Barbara. Analysis of these additional policies shows that the activity does not conflict with these policies. A copy of the responses to the County is attached for your information.

2. Recreational uses and revised attendance records for the State parks need to be included.

Response: Statistics for Gaviota State Park

Size: 2775 acres  
Uses: 59 campsites, day use picnic, fishing pier, boat launch  
Attendance: 200,000 persons during peak user months of June, July and August. Expansion of facilities is planned.

Statistics for Refugio State Beach

Size: 155 acres  
Uses: 85 campsites, 48 picnic units, sanitation station, snack shop and parking for 100 cars.  
Attendance: 203,000 visitors annually 1978-82. A 40 acre expansion is currently planned.

Statistics for El Capitan State Beach

Size: 133 acres  
Uses: 147 campsites, 81 picnic units, 2.7 miles of trails, laundry, restroom and shower facilities, store, and utilities. Swimming, surfing, and fishing are popular uses.  
Attendance: 307,000 visitors annually 1978-1982. A possible 200 acre expansion is planned.

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3. What is the size of the beach area at low and high tide?

The size of the beach at low and high tide has been estimated by SCPI to be approximately 0.9 acres at high tide and approximately 1.3 acres at low tide. The area included in that estimate is the useable portion of the beach from the railroad trestle south to the tide line and that portion located within the east and west embankments of the canyon. The canyon is about 260 feet wide at the beach and there is a distance of about 150 feet from the railroad trestle to the mean high tide line.

4. Rocky intertidal areas should be mapped as per Coastal Plan Policy 9-1.

Response: Rocky intertidal areas exist west of the Arroyo Hondo beach area. The State Lands Commission will require mapping of these areas, prior to construction, as a condition of project approval.

5. The proposed onshore pipelines and creation of the staging area require a Coastal Development Permit from the County of Santa Barbara. The pipeline installation and wellhead connections offshore require Coastal Development Permit from the Coastal Commission.

Response: Comment acknowledged

#### Contingency Planning and Emergency Response

1. Emergency response procedures should be included as an appendix to the Initial Study.

Response: Like much of the other pertinent information in the Initial Study, the emergency response procedures are lengthy and have been incorporated by reference. In addition to the emergency response procedures described in the SLC 1984 EIR, the Molino Gas Plant operates under an existing federal spill prevention control and countermeasure plan which was recently revised in November of 1982. This plan specifies procedures for safe operation of the gas plant and subsea wellheads and also identifies response procedures to be followed in the event of an emergency offshore or onshore. A copy of the plan has been submitted to the County of Santa Barbara and will be submitted to the Coastal commission if requested.

2. What is the effectiveness of these reponse procedures in dealing with potential emergencies during various weather and sea conditions?

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Response: Emergency response procedures currently in practice are considered very effective in dealing with emergencies. Subsea wellheads will have two control lines which can be manually activated from the Molino plant, or will automatically shut in the well should there be a loss in operating pressure resulting from a pipeline break, wellhead break, or other accident. Steps taken to insure adequate blowout prevention include frequent inspection and activation of emergency shut in systems, and 24-hour surveillance of well flow and pressure behavior. Furthermore, the resource being produced is sweet gas, not crude oil.

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Santa Barbara County

RESOURCE MANAGEMENT DEPARTMENT

Energy Division

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Director  
Dianne Guzman, AICP

RECEIVED  
SANTA BARBARA COUNTY  
ENERGY DIVISION

January 25, 1985

Dwight Sanders  
State Lands Commission  
1807 13th Street  
Sacramento, CA 95814

Dear Mr. Sanders,

Enclosed please find a proposed addendum to the Negative Declaration for Shell California Production, Inc.'s Proposed Well Completion and Flowline Installation Project. This addendum includes the State Lands Commission's responses to Santa Barbara County's comments on the Initial Study prepared for this project. We request that this information be included, as an addendum, to the certified Negative Declaration. With this addendum, we concur with the State Lands Commission finding that a Negative Declaration is appropriate for this project.

Sincerely,



Mary Ann Scott  
Project Manager

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Addendum to Negative Declaration  
Shell California Production, Inc.'s  
Proposed Well Completion and Flowline Installation Project

I. Clarifications and Additions to Project Description

A. Design capacity

1. The Shell Molino gas plant, permitted by Santa Barbara County in 1963, has a design capacity of 43 mmcf although it has processed as much as 48 mmcf.

B. Onshore Flowline Alignment

1. SCPI had initially intended to use an existing 3-foot diameter culvert and had described that plan to the State Lands Commission. However, SCPI has changed its plans due to the recent re-construction of Highway 101. A new boring under the highway will be required because the existing culvert is no longer accessible.

C. Onshore Flowline Installation

1. The main construction corridor will be 25 to 30 feet wide. At two or three selected sites, it will be necessary to expand the work area to a width of approximately sixty feet to allow for pipe and equipment storage. The width of the main disturbance will be approximately fifteen feet, i.e. pipe trench and excavated backfill storage.
2. Personnel and equipment access to the beach is planned to be through an existing 12-foot wide culvert below State Highway 101. Access to the beach area will only be required during the pulling and final positioning of flowline work period which is estimated to be about six days per flowline bundle.
3. No blasting will occur either onshore or offshore during construction of the proposed pipelines.
4. Approximately 157,000 gallons of water will be needed for construction and hydrostatic testing of the pipelines. The water for hydrotesting the completed pipelines will be furnished from SCPI's water well at the Molino Gas Plant. The hydrostatic test water will be treated to remove settleable solids and oil and grease at the Molino Gas Plant by pumping it through a gravity separator. In the unlikely event that such treatment will not bring the water into compliance with the NPDES discharge permit, it will be shipped to the Casmlia waste disposal facility via tanker truck.

D. Personnel transportation and material requirements

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1. There will be approximately two helicopter trips per day during the offshore well completion.
2. Employee vehicles used during construction will park, to the maximum extent feasible, in the parking lot at the Molino gas plant. Additional parking will be near the staging area, adjacent to the ranch house and other areas as needed.
3. The facility will generate 500-750 barrels per day of condensate products (i.e. propane, butane, and natural gasoline). Four to six truck trips per day will be required to remove these materials.
4. The tires of all vehicles will be sprayed before they enter the construction staging area to prevent the contamination of the orchard by the fungus Phytophthora cinnamomi, which causes root rot in avocados. The treatment planned is to spray the tires with either a copper sulfate solution, ten percent chlorine solution, or ethyl alcohol. Spraying will be done in the pasture area before vehicles enter the orchard. Use of the ethyl alcohol solution is preferred since it is effective (according to the County Agricultural Commissioners office) and does not present a risk to wildlife should it drain into the creek.

#### E. Waste materials and emissions

1. Approximately 80 cubic yards of excess earth will be generated by the boring through Highway 101. No other earth material will be waste. Welding and pulling of pipe will generate little if any waste. The contractor selected to perform the flowline installation will be responsible for disposal of solid waste generated during project construction. The contractor will hire a commercial waste hauler to dispose of the waste. This construction activity will only generate Class II materials. The waste will be taken to a solid waste transfer station in Santa Barbara for eventual disposal in a Class II sanitary landfill such as the Tajiguas landfill. The contractor will be required to dispose of solid wastes in a manner that is consistent with County regulations.

## II. Clarifications and Additions to Environmental setting, Impacts and Mitigations

### A. Geotechnical-environmental impacts

1. The typical method for maintaining separation between topsoil and lower soil horizons during excavation is to produce two spoil piles along side the trench. The topsoil layer is removed first and placed on one side of the trench centerline. Then the lower horizons are

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removed and placed on the opposite side of the trench or on the same side in an adjacent pile. This technique is not feasible or necessary in all cases. The topsoil layer may not be thick enough to feasibly remove it with standard equipment. The technique will not be of any advantage during excavation through the recently reconstructed highway embankment, since this is recent fill with virtually no topsoil. The steep slope on the western end of the flowline presents technical difficulties in excavation, and trying to separate the soil be difficult if not impossible to accomplish. A large portion of the pipeline alignment is under an existing dirt road (i.e. from the gas plant generally south and east to the steep slope) and thus, in the roadbed, the technique will not be advantageous. The vegetated part of the alignment south of the Highway is the prime candidate for separating and replacing the topsoil during excavation. This measure has been included as part of the preliminary landscape plan as a positive measure that could be implemented where practical. However, the precise locations for implementation are best left to the discretion of the landscape architect who will finalize and approve the landscape plan.

The soil and seed stabilizer envisioned is a plastic netting which is anchored onto the slope to hold seed and soil in place. Such plastic netting has recently proven slightly more effective than jute mats in aiding reestablishment of vegetation on graded slopes. It may also be less costly to use and maintain. With jute mats or the plastic netting, and with the sand bags, erosion potential on the steep slope should be adequately mitigated.

2. The onshore pipeline route up the ridge line has been selected because it is not vulnerable to land slides. In the 21 years that this pipeline route has been used, no sliding has occurred in this corridor. In the gully area immediately north, much thicker, unconsolidated soils and water from precipitation have collected, lubricating these soils and causing them to slide or slump. On the ridge, where neither thick soils nor water collects, this is not a problem. The geotechnical concern on the ridge line is erosion. SCPI has proposed extensive erosion control measure such as discussed above.

#### B. Oceanography/Water Quality

1. The discharge of wastewater from the Molino Gas Plant is to Canada de la Huerta, and is governed by an existing NPDES permit issued by the Regional Water Quality Control Board. The quantity of effluent discharged to the environment (which is limited to 50,000 gallons per day) and pollutant limits established for the discharge will not be

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exceeded by the proposed activity. The discharge permit establishes effluent limits which will protect water quality and meet regional goals. Thus no significant adverse impact from the discharge will occur.

As part of the recent NPDES permit renewal, the Regional Water Quality Control Board has required SCPI to cease discharging effluent to the Canada de la Huerta and to utilize an ocean outfall. SCPI is presently in the process of permitting two of the abandoned flowlines for use as outfalls. The Regional Board is reviewing operating parameters and dispersion characteristics of the proposed outfall to ensure that ocean plan water quality standards will be met. Effluent discharge will continue to be limited to 50,000 gallons per day.

#### C. Marine and Terrestrial Biology

1. No state or federal listed or proposed rare, threatened, or endangered species of wildlife are known to occur in the Arroyo Hondo riparian area. This conclusion is based on a review of literature, including the results of an Audubon field visit to Arroyo Hondo conducted in the Spring of 1984. It should be pointed out that the California Brown Pelican and the Peregrine Falcon are listed species which would fly by, but not utilize, the area.

A total of 13 species of plants considered to be rare and endangered or threatened by the California Native Plant Society were searched for throughout the activity area. None of these species were found. It is not likely that any of these species occur within the study area due to the disturbed nature of the area.

2. The vegetation on the beach side of Highway 101 is severely disturbed, having been impacted by highway construction, tidal debris, and highway litter. The existing vegetation includes Hottentotfig, Coyote bush and Arroyo willow. Under the railroad trestle, there is a single young Monterey cypress tree. The stream in Arroyo Hondo is contained within a concrete culvert south of the highway to beyond the point where the existing vegetation occurs. Overall, this community contains little that could be defined as representative of riparian habitat and the area is essentially void of riparian associated wildlife.
3. Disturbance of the riparian habitat in the extreme southern portion of the staging area will involve the removal of one willow tree which will be sawed off near ground level. Disturbance will also include temporary installation of mechanical pipeline rollers, construction noise and human presence.

4. South of the highway, the disturbance will include brush clearing between the highway embankment and the sandy beach along the alignment in preparation for excavation. This is a disturbed habitat and due to its location, minimal slope, and species composition it should reestablish itself within a season with minimal restoration effort. Restoration techniques for this area will include:

- Replacement of the top soil horizon.
- Disking of the surface layer of the backfill after compaction, and
- Replanting of any willow scrubs with cuttings from other willows in the area.

In addition, the small Monterey cypress tree in this area will be avoided. A portion of the beachside highway embankment will also be trenched for flowline installation. After backfilling, this area will be hand seeded with the similar assortment of grasses and forbs used recently by Caltrans and then raked.

5. Removal of the avocado trees in the orchard should not result in an erosion problem of any greater magnitude than currently exists since the orchard does not presently have any ground cover. The avocado trees are not effective at reducing erosion potential.
6. All disturbed areas will be revegetated. Revegetation plans include soil and seed stabilizer which is a plastic netting anchored onto the slope to hold seed and soil in place. Such plastic netting has recently proven slightly more effective than jute mats in aiding reestablishment of vegetation on graded slopes. It may also be less costly to use and maintain. With either jute mats or plastic netting, and the sand bag technique described, erosion potential on the steep slope should be adequately mitigated. The precise locations for the techniques will be determined by the landscape architect who will finalize and approve the landscape plan.

#### D. Cultural Resources

1. Cultural resources field work included a thorough walk over survey of: 1) the entire SCPI ownership in Carada de La Huerta, 2) the entire flowline alignment from gas plant to shore (except the boring), and 3) the Arroyo Hondo staging area and vicinity. The scatter of historic and prehistoric material that had been perviously noted in the southern portion of the orchard has been interpreted to have been deposited as a result of natural and manmade movement of soils during highway construction and orchard leveling. Because of the scatter of historic and prehistoric debris mentioned above, the existance of historic and prehistoric sites in the immediate area, and the fact the Arroyo Hondo Canyon floor is a prime location

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for a prehistoric encampment, there is a good possibility that a buried deposit exists under the staging area. This site(s) is estimated to be 9 feet deep.

2. The significance of the prehistoric and historic resources at the staging area has not been fully assessed. However, the proposed action will involve no excavation in the portion of the staging area suspected to contain a subsurface deposit. Since SCRI will use existing ROW's, which have been previously disturbed, it is unlikely that artifacts will be found.

#### E. Socioeconomics

1. A relatively small workforce is required to construct the proposed facilities: 20 to 25 persons for a 60-day period. This workforce alone is unlikely to have a significant impact on the socioeconomic factors of population growth, housing availability, employment or income in the local area of Santa Barbara County. However, if the construction should overlap with other major projects in the County (e.g. the Chevron project), this project could contribute to a significant cumulative socioeconomic impact. It is recommended as a mitigation measure that this project be subject to socioeconomic monitoring to document the source of the the workforce and purchase of materials.

#### F. Land Use of Coastal Policies

1. Consistency and adherence of all applicable Santa Barbara County policies is required of the proposed project. Additional Local Coastal Plan (LCP) policies which are applicable to this project include policies dealing with Environmentally Sensitive Habitats (e.g. LCP 2-11, 9-1, 9-32, 9-38, 9-40 and 9-41); recreation, particularly access (e.g. LCP 7-2, 7-3, 7-18); pipelines (e.g. LCP 3-2, 6-9, 6-14, 6-15, 6-16, 6-17, 6-18 and 6-19), and air quality (e.g. LCP 11-1). These policies are summarized in the following.

Policy 2-11: This policy requires regulation of development adjacent to Environmentally Sensitive Habitat Areas to protect these areas.

Policy 3-2: This policy requires designing shoreline construction so as to preclude adverse impacts on shoreline and supply and interference with lateral beach access. This policy applies to the landfall at Arroyo Hado.

Policy 6-9: This policy requires the preparation of an emergency response plan.

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- Policy 6-14: This policy regulates the placement of pipelines in the Coastal Zone. Surveys, revegetation, and restoration plans are required.
- Policy 6-15: This policy prohibits use of herbicides during pipeline construction and restricts the seederasty of soil.
- Policy 6-16: This policy requires that pipeline be sited and constructed in such a manner as to inhibit erosion.
- Policy 6-17: This policy states that pipelines should be sited to avoid important coastal resources.
- Policy 6-18: For pipelines passing through habitat areas, the segment shall be isolated by automatic shut-off valves.
- Policy 7-2: This policy mandates an easement to allow vertical access to the beach for any development between the first public road and the ocean.
- Policy 7-3: This policy mandates lateral easements along the base of the coastal bluffs.
- Policy 7-18: This policy state that expanded opportunities for access and recreation shall be provided along the gaviota coast and specifies Arroyo Hondo as an area where vertical access shall be acquired.
- Policy 9-1: This policy required (1) that the proposed project is in conformity with the stream corridor Environmentally Sensitive Habitat Area (ESHA) protection policies, and (2) that the development plan show the precise location of the ESHA.
- Policy 9-32: This policy requires that the pipeline be sited to avoid significant rocky points and intertidal areas.
- Policy 9-40: This policy states that if riparian plant species are removed, revegetation with local native plants is required.
- Policy 9-41: This policy required minimal construction and grading impacts in stream corridors.
- Policy 11-1: This policy states that the provision of the Air Quality Attainment Plan shall apply to the Coastal Zone.

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United States Department of the Interior

FISH AND WILDLIFE SERVICE  
ECOLOGICAL SERVICES  
24000 Avila Road  
Laguna Niguel, California 92677

DATE	DEC 27 1984
DJE	
CFE	
ADW	
RGP	
FILE	07-25-1
Enc.	

W40442

December 17, 1984

Ms. Susan Livenick  
California State Lands Commission  
245 W. Broadway, Suite 425  
Long Beach, California 90802

Re: Shell California Production Inc. - Molino Field Well and  
Production - State Lease PRC-2920.1

Dear Ms. Livenick:

The Fish and Wildlife Service (FWS) provides the following comments in response to a Notice of Consultation/Preparation dated November 2, 1984 (NOC/P-11/2/84) and a recent telephone conversation (November 28, 1984) between Donald J. Everitts and this office's OCS Coordinator. We provide these comments in compliance with our public trust responsibilities and with provisions of the Fish and Wildlife Coordination Act (16 U.S.C. et seq.).

FWS would like to state that this office has neither received or commented on the two previous State Lands Commission certified EIRs referenced in the NOC/P-11/2/89 as SCH79101011 and SCH83110901. We would appreciate receiving copies in order to complete our files. We would also appreciate having copies of any additional OCS documents for the southern California coast sent to the above address to the attention of the OCS Coordinator, Mr. John Wolfe.

Recommendations

In order to avoid unnecessary impacts to fish and wildlife resources, we offer the following suggestions:

Water from a desalinization unit should be used as a hydrostatic testing fluid rather than groundwater from offshore or onshore formation waters. We understand that if hydrostatic testing fluid becomes contaminated it will be treated properly and discharged in compliance with provisions of NPDES permits and any stipulations from the San Luis Obispo Regional Water Quality Control Board.

The proposed use of the "pull barge" technique for pipelaying is preferred. However, it is not clear to us what the width of the construction area will be and what the associated impacts will be. If blasting occurs, and pipelines

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are buried through the surf zone and the surge zone in water depths to 15 fathoms, we recommend incorporation of these conditions:

1. In laying the pipeline, no trenching or blasting shall occur within 200 feet of any existing kelp bed or previously documented kelp habitat.
2. During pipeline installation, all assembly barges shall be anchored outside of any kelp beds with a buffer zone of twice the distance of anchor swing radii.
3. Prior to any detonation of charges, the area will be cleared of marine mammals and birds to the satisfaction of a California Department of Fish and Game (CDFG) observer. Special emphasis shall be given to the protection of listed Federal and State endangered species, including the California brown pelican, California least tern, and American peregrine falcon.
4. Each offshore detonation will be preceded by a small charge designed to frighten away fish from any nearshore and intertidal habitats in the blasting areas.
5. All onshore and offshore construction and staging areas will be clearly defined and restricted to minimal areas to avoid impacting kelp beds, riparian, and coastal sage scrub habitats. Offshore pipeline construction shall be restricted to a maximum of 50 feet in width, onshore pipeline construction to less than 30 feet, and onshore staging area to less than one acre in either avocado orchards or grazing lands.
6. Shell California Production, Inc. (SCPI) will notify FWS, CDFG, and National Marine Fisheries Service (NMFS), in writing, prior to commencement of any pipeline laying in shallow nearshore and intertidal waters.
7. SCPI will have pre- and post-construction surveys conducted by qualified marine biologists during the pipelaying construction phase offshore, and by a qualified wildlife biologist and botanist for the onshore pipeline construction. Reports will include photos and assessments of habitat values impacted by short-term, long-term, and cumulative effects of development, including an analysis of residual impacts noted in the NOC/P from the 1963 construction. SCPI shall incur the expenses associated with the hiring of qualified biologists and the preparation, distribution, and coordination of reports with FWS, CDFG, NMFS, and other concerned agencies.

Based on results of the post-construction survey, concerned agencies may establish that mitigation is required to offset losses of damaged terrestrial and aquatic resources. Any mitigation measures shall be developed and implemented in coordination with FWS, CDFG, and NMFS staffs and shall be at the expense of SCPI.

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8. Pipelines shall be designed and installed without any projections that will either snare or potentially damage sport and commercial fishing gear.
9. Loss of raptor roosting and/or nesting trees shall be replaced by erecting at least two nesting platforms and two roosting poles with perching crossbraces on an interim basis until replacement trees are of suitable size for raptor uses. Location of structures shall be determined after pre-construction surveys and onsite meetings with CDFG and FWS biologists.

We request that these stipulations be incorporated into any permit issued for this proposed project. We request a copy of any permits issued. If you have any questions concerning our comments, please contact John Wolfe or me at (714) 831-4270.

Sincerely yours,



Nancy M. Kaufman  
Field Supervisor

cc: Shell California Production Inc., Anaheim CA  
CDFG, Reg. 5, Long Beach, CA (Attn: K. Lal)  
CDFG, MRR, Long Beach, CA (Attn: D. Nitsos)  
CDFG, Goleta, CA (Attn: J. Davis)  
NMFS, Terminal Island, CA (Attn: R. Hoffman)  
CCC, Santa Barbara, CA (Attn: J. Johnson)  
County of Santa Barbara, Energy Div., CA (Attn: S. Maves)

ADDED 01/30/85

3

CALENDAR DATE	2/4/86
MINUTE PAGE	533

## STATE LANDS COMMISSION

245 WEST BROADWAY, SUITE 425  
LONG BEACH, CALIFORNIA 90802  
TELEPHONE: (213) 590-5201



File Ref.: W 40442

January 25, 1985

Nancy Kaufman  
Fish and Wildlife Service  
Ecological Services  
24000 Avila Road  
Laguna Niguel, CA 92677

Dear Ms. Kaufman:

Thank you for your comments, dated December 17, 1984 and received December 27, 1984, on our Initial Study (SCH #84101008) on the completion of and installation of pipeline bundles from wells on the ocean floor of State Oil and Gas Lease PRC 2920 to the Molino Gas Processing Plant in Santa Barbara County. Unfortunately, because the public review period for the Initial Study closed on December 10, 1984, we must consider your comments as responding to the Negative Declaration rather than to the Initial Study.

The 1980 and 1984 EIRs were sent to FWS in Sacramento at the time they were published. We suggest that you request a transfer of these documents to your office. Alternately, we will be happy to reproduce copies of the document for you at your expense. The Laguna Niguel office has been added to our current CEQA mailing list.

You have suggested that water from a de-salinization unit be used for hydrostatic testing. As of this date, no adverse impact associated with SCPL's use of ground water for the testing program has been identified. The testing program is a limited, one-time event and extraction of ground water for the program is not expected to have any significant or long term effect on the water table.

You have asked about the width of the actual construction zone in the offshore. The "sled" will clear a path approximately seven feet wide, and any disturbance will occur within that seven foot wide swath.

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You have suggested a number of conditions which relate to blasting within the surf and surge zone. SCPI is laying the pipelines immediately adjacent to existing pipelines, and has recently surveyed the corridor. It appears that blasting will not be necessary and, thus, that conditions on blasting will not be necessary.

You have also suggested restrictions on other construction activities. Offshore, the construction corridor will be significantly less wide (seven feet) than the 50 foot width you have suggested. Onshore, certain technical considerations control the minimum areas required for the project. By and large, the onshore construction zone will lie within the 30 feet you have suggested; however the route crosses complex terrains and the use of sound engineering and construction techniques is of primary importance. In at least three areas, it will be necessary for SCPI to use a considerably wider corridor in order to turn equipment and to stack pipe. Finally, the project cannot be staged from a one acre site. SCPI proposes to conduct it's activities within the minimum practical area. All staging and construction activities will be conducted on previously disturbed lands. Where the pipeline must be pulled through a narrow area of riparian habitat, rollers will be used so that there is no physical contact with the habitat.

You have requested that SCPI contact FWS, NMFS and CDFG prior to commencement of activity in nearshore waters. The CDFG is the responsible State agency and SCPI is being conditioned to be required to work closely with CDFG on the project. We will inform SCPI that you have requested that FWS and NMFS be informed.

You have requested pre and post-construction surveys of both onshore and offshore pipeline routes, followed by extensive reports on impact to habitat. In this case, we have incorporated the measures requested by the CDFG into the project. These measures involve surveying of the kelp beds and, if necessary as determined by CDFG, replanting of the kelp beds. Extensive surveying of onshore habitat has already been conducted by SCPI and it's consultant and the project has been designed so that no sensitive habitat will be impacted. The County of Santa Barbara and the State Lands Commission, in approving the project, are requiring erosion control and re-vegetation measures on all disturbed areas. The County, additionally, will require post-construction monitoring under its LCP. All identified impacts to habitat will be mitigated by the requirements of the SLC, the County of Santa Barbara and the CDFG.

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INVOICE PAGE	535

You and other agencies have requested that subsea pipelines be designed and installed without projections. The engineering design of the pipelines does take this into account, and the subsea pipelines will be without obstruction.

Finally, you have requested measures to mitigate the loss of raptor roosting and nesting habitat. In fact, no raptor roosting or nesting habitat will be impacted by the project and these mitigation measures are unnecessary. Additionally, before construction can commence, CDFG must give approval that avian nesting will not be impacted.

Thank you for your participating in the public review process. Please contact Susan Livenick at (213) 590-5201 or Dwight Sanders at (916) 322-7827 if you have further comments.

Very truly yours,

SUSAN R. LIVENICK  
Associate Mineral  
Resources Engineer

SRL:vn

cc: Jim Ragland, SCPI

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ATTACHMENT 2

COMMENTS TO NEGATIVE DECLARATION

AND RESPONSES

DEPARTMENT OF FISH AND GAME

CALIFORNIA COASTAL COMMISSION

CITY OF SANTA BARBARA

DEPARTMENT OF CONSERVATION

ADDED 01/30/85

CALENDAR PAGE	241.30
MINUTE PAGE	537

## OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET  
SACRAMENTO, CA 95814

9961 87 001

January 28, 1985

458 1008

Dwight E. Sanders  
State Lands Commission  
1807 13th Street  
Sacramento, CA. 95814

Subject: Well Completion and Construction of Flowlines to Gas Plant  
SCH #84101008

Dear Mr. Sanders:

The State Clearinghouse submitted the above named proposed Negative Declaration to select state agencies for review. The review period is closed and the comments of the individual agency(ies) is(are) attached. If you would like to discuss the concerns and recommendations in their comments, please contact the staff from the appropriate agency(ies).

You may formally respond to the commenting agency(ies) by writing to them, including the State Clearinghouse number on all such correspondence. You should attempt to resolve any concerns of the state agencies before taking further action on the project. Once you have responded to the comments, state review of your draft environmental document will be complete.

If the project requires discretionary approval from any state agency, the Notice of Determination must be filed with the Secretary for Resources as well as with the County Clerk. Please contact Mark Boehme at (916) 445-0613 if you have any questions about the environmental review process.

Sincerely,

John B. Ohanian  
Chief Deputy Director

cc: Resources Agency  
Attachment

ADDED 01/30/85

CALENDAR PAGE	241.31
ANSWER NO.	538

State of California

## Memorandum

Date : January 22, 1985

To : 1. Projects Coordinator  
Resources Agency

2. State Lands Commission  
1807 - 13th Street  
Sacramento, California 95814  
Attn: Dwight E. Sanders, Chief  
Division of Research and Planning

From : Department of Fish and Game

Subject: Proposed Negative Declaration for Shell California Production, Inc.'s Proposed Well Completion and Flowline Installation Project, State Oil and Gas Lease PRC 2920, Molino Area, Santa Barbara County. SCH 84101008

The Department has reviewed the document for the completion of two previously approved wells, and installation of offshore and onshore flowlines to transport produced gas from the well sites to an upgraded onshore processing plant. The document provides mitigation measures which will be adopted by the Commission to either mitigate or eliminate potential project impacts to marine and terrestrial resources. These measures as proposed will, for the most part, provide mitigation for potential project impacts. The discussion sections on page three of the proposed Negative Declaration pertaining to Marine Biology should be modified to clarify the intent of the mitigation measure.

Therefore, we recommend that the first sentence of the first Paragraph under the Discussion section on page three be modified as follows, "... recommend that SCPI revegetate disturbed kelp".

This would clarify the discussion section to state that SCPI and not the Department will be responsible for kelp bed revegetation.

With this modification, we would have no objection to the adoption of a Negative Declaration for the proposed project.

Should you have any questions regarding our comments and recommendation please contact Rolf Mall, Environmental Services Supervisor, Marine Resources Region, 245 West Broadway, Suite 350, Long Beach, California 90802. The phone number is ATSS 8-635-5155 or (213) 590-5155.

*Jack C. Farnell*  
for Jack C. Farnell  
Director

ADDED 01/30/85

CALENDAR DATE	241.32
MINUTE PAGE	539



CITY OF SANTA BARBARA

COMMUNITY DEVELOPMENT DEPT  
Redevelopment • Environmental Review  
Planning • Zoning • Building • Housing



1235 CHAPALA STREET  
P.O. DRAWER P-P  
SANTA BARBARA, CA 93102  
(805) 963-1663

January 24, 1985

Dwight D. Sanders  
State Lands Commission  
1807 13th Street  
Sacramento, CA 95814

RE: Proposed Negative Declaration #378, Shell/Molino Well Completion,  
Santa Barbara County

Dear Mr. Sanders:

I have reviewed the proposed Negative Declaration (ND) and submit the following comments:

1. It is my understanding that several substantive comments on the Initial Study were submitted by Santa Barbara County, the Coastal Commission and the Department of Fish and Game. It appears that none of the comments were incorporated into the ND even though specific environmental issues were addressed. These should be addressed in the Final ND. As Lead Agency, the Commission is required to do this so that Responsible Agencies have an adequate document for their purposes.
2. It is unclear why the text of the ND lists "mitigations" under several subject areas when no potential significant impacts were identified. There also appears to be no connection between the potential effects listed in the environmental checklist and the discussion of mitigations.
3. There is no discussion of the environmental effects associated with the actual processing of gas at the plant. Since the plant's operation is a function of the proposed wellheads and flow lines then the ND needs to address any applicable consequences.
4. Page 15 states that all environmental effects associated with wellhead completion and flow line construction were assessed in the SLC 1980 EIR.

ADDED 01/30/85

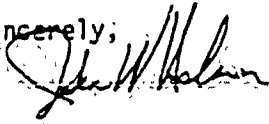
CALENDAR PAGE	241.34
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Dwight D. Sanders  
January 24, 1985 Page 2

Have all mitigations adopted by the Commission and Responsible agencies been incorporated into this ND? If they have not, then there would appear to be some outstanding environmental issues that need to be addressed.

My concern for the adequacy of this ND lies in the fact that it will be the environmental document used by both the County and the Coastal Commission. There seems to be some deficiencies in the document that need correction before the project can proceed. Thank you for the opportunity to comment.

Sincerely,



John W. Helmer  
Coastal Energy Specialist

cc: Santa Barbara County  
Coastal Commission

ADDED 01/30/85

CALENDAR PAGE	241.35
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## OFFICE OF PLANNING AND RESEARCH

100 TENTH STREET  
SACRAMENTO, CA 95814

(916/445-0613)

5861-03  
U.S. MAIL  
JAN 30 1985

January 29, 1985

Dwight E. Sanders  
State Lands Commission  
1807 13th Street  
Sacramento, CA. 95814**Subject:** Well Completion and Construction of Flowlines to Gas Plant  
SCH # 84101008**Dear Mr. Sanders:**

The enclosed comments on your draft environmental documents were received by the State Clearinghouse after the end of the state review period. We are forwarding these comments to you because they provide information or raise issues which may assist you in project review.

To ensure the adequacy of the final document you may wish to incorporate these additional comments into the preparation of your final environmental document.

Sincerely,

John B. Ohanian  
Chief Deputy Director

enclosure

cc: Resources Agency

ADDED 01/30/85

CALCULATED PAGE	241.36
MINUTE PAGE	543

Dwight E. Sanders  
State Lands Commission  
1207 13th Street  
Sacramento, California 95814

THE CALIFORNIA DEPARTMENT OF CONSERVATION

Date: January 29 1985

Subject: SOG 84101013

RECEIVED

JAN 29 1985

OFFICE OF PLAIN SANTA BARBARA COUNTY  
& RESEARCH

Department of Conservation—Office of the Director  
(916) 227-2097

The Department of Conservation's Division of Oil and Gas has reviewed the proposed Negative Declaration for Shell California Production, Inc.'s proposed Well Completion and Plugging Installation Project. The following comments are offered for your consideration:

Within our area of responsibility, the Department agrees with the finding of the State Lands Commission that this project does not have the potential to cause significant adverse environmental impacts provided the operator complies with the Division's regulations.

The following is to inform you of primary responsibilities of the Division of Oil and Gas with respect to this project.

The Division of Oil and Gas is mandated by Section 3106 of the Public Resources Code (PRC) to supervise the drilling, operation, maintenance, and abandonment of wells for the purpose of preventing (1) damage to life, health, property, and natural resources; (2) damage to underground and surface water suitable for irrigation or domestic use; (3) loss of oil, gas, or reservoir energy; and (4) damage to oil and gas deposits by infiltrating water and other causes. Furthermore, the PRC vests in the State Oil and Gas Supervisor the authority to regulate the manner of drilling, operation, maintenance, and abandonment of oil and gas wells so as to conserve, protect, and prevent waste of these resources, while at the same time encouraging operators to apply viable programs for the purpose of increasing the ultimate recovery of oil and gas.

The scope and content of information that is germane to the Division's responsibility are contained in Sections 3000 et seq. of the PRC and administrative regulations under Title 14, Chapter 4 of the California Administrative Code.

Written approval from the State Oil and Gas Supervisor is required prior to drilling, reworking, injecting into, plugging, or abandoning any well. The operator's notice of intent to perform any well operation is reviewed on an engineering and geological basis.

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The Division must be notified to witness or inspect all operations specified in the approval of any notice. This includes tests and inspections of blowout-prevention equipment, reservoir and freshwater protection measures, and well-plugging operations.

In addition to filing a notice to drill a new well, the operator must have a bond on file with the Division before drilling is allowed to begin. The purpose of the bond is to secure the State against any expenses that the State may incur in obtaining operator compliance with applicable laws, regulations, and orders of the State Oil and Gas Supervisor.

If you have any questions, please contact Ken Henderson at the Division of Oil and Gas district office in Santa Maria. The address is 301 W. Church Street, P.O. Box 227, Santa Maria 93454; phone (805) 925-2686.

Diane E. Shell  
Deputy Director

cc: Ken Henderson, Division of Oil and Gas, Santa Maria  
Bob Reid, Division of Oil and Gas, Sacramento

ADDED 01/30/85

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### RESPONSE TO DEPARTMENT OF FISH AND GAME

It is the intent of the mitigation measure regarding the project's impacts on kelp to require SCPI to revegetate the impact area. This responsibility is not assigned to the California Department of Fish and Game.

### RESPONSE TO CALIFORNIA COASTAL COMMISSION

By this attachment your comments are made part of the Negative Declaration for SCPI Flowline Installation (SCH No. 84101008). We do not believe, however, that the physical attachment of the cited EIR sections to the Negative Declaration is necessary for two reasons: (1) the appropriate sections are incorporated by reference as provided by law and the EIR Guidelines; and (2) the cited documents were widely distributed and are readily available to public agencies and interested parties via area libraries. Finally, please note the material from the County of Santa Barbara in Attachment 1 regarding Coastal Plan policies.

### RESPONSE TO CITY OF SANTA BARBARA

- (1) You are correct in that Santa Barbara County, the Coastal Commission and the Department of Fish and Game submitted comments on the Initial Study. The staff of the State Lands Commission responded specifically to each of the comments by letters dated December 28, 1984, December 31, 1984 and December 31, 1984, respectively. As you have stated, specific environmental issues (from received comments) were addressed. All comments to the Initial Study and their responses, as well as all comments to the ND and their responses, are Attachments 1 and 2 to the proposed ND to be considered by the Commission.
- (2) As stated on page 2 of the proposed Negative Declaration:

"This proposed negative declaration references: (1) in terms of the Initial Study, only those potential environmental impacts which may occur as a result of or during the conduct of the well completion or flow line installation activities as proposed by the applicant; and (2) mitigation measures incorporated into the proposed project to avoid potentially significant effects." (emphasis added)

See also Section 15070(b)(1) of the State EIR Guidelines for further clarification.

The checklist is but one part of the Initial Study; see also (1) above quoted.

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- (3) The gas plant is currently under permit to the County of Santa Barbara and the processing of the gas from this proposed project will be covered within the parameters of the existing permit. See page 17 of the Initial Study.
- (4) Again, please refer to number (2) above. -- If all potentially significant effects had not been "mitigated" by changes in the proposed project, the Commission could not make the proposed finding: "determine that the project, as revised and approved, will not have a significant effect on the environment."

RESPONSE TO DEPARTMENT OF CONSERVATION

Comment acknowledged.

ADDED 01/30/85

CALIFORNIA DEPARTMENT OF CONSERVATION	241.40
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## Memorandum

Department of Fish and Game  
245 W. Broadway, Suite  
Long Beach, CA 90802  
ATTN: John L. Baxter

Date : December 31, 1984

File No.: W 40442

STATE LANDS COMMISSION  
245 West Broadway, Suite 425 - Long Beach, CA 90802

Telephone: ATSS

## Response to Comments

Subject: Notice of Consultation/Preparation for Well Completion,  
Installation of Flowlines and Production of Gas, Shell  
California Production, Inc. P.R.C. 2920.1, Santa Barbara County.  
W 40442, SCH# 84101008

Thank you for your recent comments on the above-referred project. You have requested that the project be mitigated to include measures to protect marine and terrestrial habitats. Commission staff has incorporated your recommendations, as mitigative measures, into the project and will condition approval of the project on meeting your concerns.

Specifically, you have requested pre- and post-construction surveys of the kelp areas to determine kelp density and kelp loss. In addition, if kelp loss is significant, you have requested a survey two years after construction to evaluate kelp recovery and, if needed, revegetation following that survey.

Because SCPI has recently (summer '84) completed a survey of the kelp bed, we are not requiring a additional pre-construction survey. However, all the post-construction activities you have recommended have been incorporated into the project.

Additionally, you have requested replanting of disturbed riparian habitat, seasonal restriction on activity within the Arroyo Hondo Creek bed and notification of the Department pursuant to Fish and Game Code 1603. All these have been incorporated into the proposed project.

Thank you for your interest in the project.

*Susan R. Livenick*  
SUSAN R. LIVENICK  
Associate Mineral  
Resources Engineer

SRL:cg

ADDED 01/30/85

CALENDAR PAGE	241.41
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