



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

NOV 5 2009

Reply To
Attn Of: OWW-130

Susan Childs
Regulatory Affairs Manager, Alaska
Shell Exploration & Production Company
3601 C Street, Suite 1000
Anchorage, Alaska 99503

RE: Request for Additional Information Regarding Shell's Notices of Intent (NOIs) for Coverage under the NPDES General Permit (AKG-28-0000) for Exploration Activities in the Chukchi and Beaufort Seas, Alaska

Dear Ms. Childs:

The U.S. Environmental Protection Agency (EPA) has reviewed the five Chukchi Sea Notices of Intent (NOIs) and the two Camden Bay NOIs submitted by Shell Exploration & Production Company (Shell) on May 22, 2009 and May 7, 2009, respectively. The NOIs request permit coverage under the Arctic National Pollutant Discharge Elimination System (NPDES) General Permit, AKG-28-0000 (Permit) for waste water discharges from Shell's proposed exploration activities. The exploration activities are planned for the 2010 Outer Continental Shelf (OCS) drilling season with the drillship *Frontier Discoverer*.

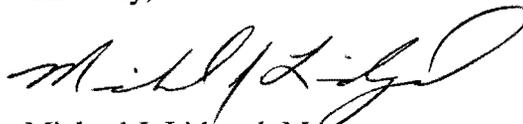
In order to determine whether the requested discharges can be appropriately covered under the Permit, EPA is requesting the following information. We would appreciate the information by November 30, 2009.

1. The Permit at II.B.7 authorizes the permittee to discharge those drilling fluids, specialty additives, and mineral oil pills that meet the criteria of the Permit and are contained in the operator's drilling fluid plan. EPA requests a copy of this plan.
2. In accordance with the NOI requirements, please include a description of operations within the respective lease blocks. EPA has reviewed Shell's Exploration Plans for the 2010 Drilling Programs in the Chukchi and Beaufort Seas and understands that Shell intends to drill up to three wells within the five lease blocks identified in the Chukchi Sea and two wells within the two lease blocks in Camden Bay. We also understand that the drilling schedule is dependent upon ice conditions, weather, subsistence activities, and other factors. In order to meet EPA's Permit requirements, please submit this information to EPA under separate cover.
3. Please provide line drawings that show flows of each waste stream through the facility for all requested discharges. The line drawings should indicate the flows of

- the proposed discharged waste streams, intake sources, operations contributing to the effluent, and treatment units labeled to correspond to the proposed discharges.
4. The NOIs reported the same depths of discharge for each respective lease block associated with all the waste streams that Shell is requesting for Permit coverage. For example, would all the waste streams proposed to be discharged at the Posey Lease Block 6912, Burger J Drill Site, be at depths of 144 feet? Please clarify the depths of discharge for each waste stream pertaining to all seven NOIs.
 5. Table 1 in the NOI for Lease Number OCS-Y-2142, Lease Block 7007, Southwest Shoebill Prospect, is not formatted the same as the other NOIs. The summary table for this NOI does not have the discharge rate listed as the others do. At the same time, the "Composition" information is useful. The tables should have a consistent format.
 6. The NOI for Lease Number OCS-Y-2111, Lease block 6864, Crackerjack Prospect, has *Drill cuttings (from MLC and 36-inch section)* listed at a discharge rate of 632 bbl/hr whereas the others have it listed as bbl/day or bbl/well. The same discrepancy occurs for other types of wastes. Again, please provide a consistent format.
 7. Please verify that the "cooling water" described in Table 1 for each lease block is, in fact, non-contact cooling water as specified in the Permit (Discharge 009). Also, the Permit allows for discharges of uncontaminated ballast water (Discharge 010), however, Table 1 describes these discharges as "ballast water." Please clarify that the proposed discharges are uncontaminated.
 8. Several waste streams are proposed to be discharged through the disposal caisson, which is described in detail in the waste management sections of the Exploration Plans. Please provide a diagram of this unit.

Thank you for your attention to this matter. Please do not hesitate to contact me at lidgard.michael@epa.gov or (206) 553-1755, or Hanh Shaw of my staff at shaw.hanh@epa.gov or (206) 553-0171, if you have any questions.

Sincerely,



Michael J. Lidgard, Manager
NPDES Permits Unit

cc: Dianne Soderlund, Manager, Oil and Gas Sector