



**Shell Offshore Inc.**  
3601 C Street, Suite 1314  
Anchorage, AK 99503

February 28, 2011

Mr. Doug Hardesty  
U.S. EPA, Region 10  
1435 North Orchard Street  
Boise, ID 83706

Re: EPA Outer Continental Shelf (OCS) Operating Permit – Shell Beaufort Sea Alaska  
Exploratory Drilling Program: Conical Drilling Unit Kulluk

Dear Mr. Hardesty:

The attached application consists of a package of completed U.S. Environmental Protection Agency (EPA) Operating Permit Application forms and a technical supplement. Shell is asking for a synthetic minor operating permit for the Kulluk to explore in the Beaufort Sea. The attached supplementary report provides the updated description of the project, the logic for why it will be minor, and a discussion of the impact modeling analysis. Note that there are some minor changes in the source description from that given in the impact modeling protocol, which result in a net reduction of emissions and impacts. These application materials document that the Kulluk, when it is an OCS, will comply with all applicable EPA and State of Alaska corresponding onshore area (COA) rules.

Please feel free to contact Rodger Steen (303-807-8024) or Pauline Ruddy (907-771-7243) regarding any additional details. We appreciate your early attention to this application.

Sincerely,

Shell Offshore Inc.

A handwritten signature in cursive script that reads "Susan Childs".

Susan Childs  
Alaska Venture Support Integrator Manager

Attachment

cc:

*Natasha Greaves, EPA R10*

*Susan Childs, Shell*

*Lance Tolson, Shell*

*Pauline Ruddy, Shell*

*Nicole StAmand, Shell*

*Mark Schindler, Octane LLC*

*Alan Schuler, ADEC, DAQ*

*Kirk Lilley, attorney*

*Eric Hansen, ENVIRON Int.*

*Kirk Wings, ENVIRON Int.*

*Rodger Steen, Air Sciences Inc.*

*Tim Martin, Air Sciences Inc.*