From: Chen, Isaac
To: Houston, Robert; Js Wilson
Subject: FW: NPDES Permit GMG290000 Permit Applicability Question - Riserless Well Intervention Vessels
Date: Friday, August 29, 2014 10:57:00 AM

Scott,
I think the primary question is whether or not we consider their activity is part of O/G exploration or production activities. Also, as Robert and I understood that the discharge of hydrate control fluids will be covered by the primary operator, not by the vessel operator. Please advise. Thanks.

From: Maness, Katie [mailto:Kathryn.Maness@anadarko.com]
Sent: Friday, August 29, 2014 9:54 AM
To: Houston, Robert; Chen, Isaac
Subject: FW: NPDES Permit GMG290000 Permit Applicability Question - Riserless Well Intervention Vessels

Hello Robert,
This is the determination that I received from EPA HQ and EPA Region 4 regarding the applicability of the NPDES General Permit (GEG460000) and CWIS requirements to riserless intervention vessels below. EPA Region 4 and EPA HQ stated that the NPDES permit and CWIS requirements apply to the riserless intervention vessel. Currently EPA Region 6's position is that the riserless intervention vessels do not require NPDES permitting coverage (GMG290000) because the vessel is covered under Coast Guard/Marpol requirements. If you change your position on the issue, could you please let me know? This is an important issue to Anadarko so that we can make sure that the facilities are properly permitted.

Thanks for your help in this matter.

Katie Maness
Anadarko Petroleum Corporation
EHS Manager
832-636-2582

From: Shell, Karrie-Jo [mailto:Shell.Karrie-Jo@epa.gov]
Sent: Wednesday, August 06, 2014 7:33 AM
To: Maness, Katie
Cc: Staples, Bridget; Nuhfer, Mark
Subject: FW: NPDES Permit GMG29000 Permit Applicability Question - Riserless Well Intervention Vessels

Kathryn,

Our EPA HQ national expert for offshore oil and gas agrees with me that riserless well intervention vessels need coverage under the R4 GP for any NPDES discharges (and for the CWIS) during times when the vessel is part of any offshore oil and gas exploration and production activities.

Karrie-Jo Robinson-Shell, P.E.

Environmental Engineer
Water Protection Division
(404) 562-9308

From: Wilson, Scott
Sent: Wednesday, August 06, 2014 7:59 AM
To: Shell, Karrie-Jo
Cc: Staples, Bridget
Subject: RE: NPDES Permit GMG29000 Permit Applicability Question - Riserless Well Intervention Vessels

Karrie-Jo:

I agree with your interpretation. When the MODU is stationary at the site it is no longer in a transportation mode and would need coverage under an NPDES permit, in this case GEG460000. As Katie mentioned, the facility will be discharging hydrate control fluids (probably methanol or glycol), which they intend to be covered under the general permit. As mentioned, there would be other discharges such as deck drainage and sanitary, that are authorized discharges under the general permits.

They can't pick and choose which discharges they want covered under the general permit and which they think only the Coast Guard would control.

The 316(b) permit requirements would also apply as Katie mentioned and referred to the section of the permit.

Hopefully this is helpful. Please let me know if you need any more information.

Scott Wilson
Energy Coordinator
Industrial Permits Branch
USEPA Office of Wastewater Management
1200 Pennsylvania Ave., NW
Washington, DC 20460
202-564-6087
Mail Code: 4203m

From: Shell, Karrie-Jo
Sent: Wednesday, August 06, 2014 7:04 AM
To: Wilson, Scott
Cc: Staples, Bridget
Subject: FW: NPDES Permit GMG29000 Permit Applicability Question - Riserless Well Intervention Vessels

I need your help in responding to this question about the applicability of the R4 OCS GP. In particular, the CWIS requirements.

It is my understanding that a riserless well intervention vessels with discharges to the Waters of the US would need coverage under the GP, since, while it is hooked up to the primary vessel (performing the exploration activity), it becomes part of the entire exploration operation. Therefore, any CWISs or discharges from the riserless well intervention vessel need to be covered under the GP.

Regarding the CWIS, the current permit only includes requirements for new offshore oil and gas vessels. Existing sources must comply with BPJ requirements until the new CWIS rule for existing sources becomes effective.

Thanks.
Karrie-Jo Robinson-Shell, P.E.
Environmental Engineer
Water Protection Division
(404) 562-9308

From: Maness, Katie [mailto:Kathryn.Maness@anadarko.com]
Sent: Tuesday, August 05, 2014 5:05 PM
To: Shell, Karrie-Jo
Subject: NPDES Permit GMG29000 Permit Applicability Question - Riserless Well Intervention Vessels

Hello Karrie-Jo,

I have a NPDES permit applicability question that I need your assistance with clarifying. A vessel (not a Mobile Offshore Drilling Unit (MODU)) will be conducting riserless wireline operations on one of our subsea wells for a time period that could range from 2 days to 3 weeks. The vessel will be connected to a subsea well via a wireline. The vessel will only be connected to the subsea well structure via a ¾" steel cable and a small (2-3") control umbilical that will supply power to the subsea well structure and wireline tools. The wireline is deployed through the moon pool of the vessel and travels in the open water column through the grease head to the intervention stack where it seals the wireline and forms barriers to well pressure and fluids when travelling in and out of the well. There are two coiled tubing lines on the deck (deployed through the moon pool or over the vessel side) and connected to the circulating system (i.e. pumps , gas buster) on the deck of the vessel. Monoethylene Glycol (MEG), a hydrate control fluid, is circulated from the coil tubing supply to the coil tubing return via the intervention stack on the subsea tree for hydrate inhibition and circulation of any trapped hydrocarbons in the subsea lubricator (attached to the wireline and connected to the subsea stack on the tree) to surface to prevent any release to sea when tripping the lubricator. Hydrocarbons will leave the wellbore and come to the surface every time the lubricator is flushed to the gas buster on the deck of the vessel. This is a venting mechanism for safety and environmental purposes only. This vessel is not used for flowing hydrocarbons to the surface or storing and offloading of hydrocarbons for transportation or sales. There will be no

specific discharges from the vessel associated with the well operation (i.e. no well completion discharges, workover fluids discharges, or drilling mud discharges). However, a small volume of hydrate control fluid will be discharged subsea which is allowed by the NPDES General Permit.

There has been a question if the NPDES General Permit GEG460000 applies to the riserless well intervention vessel because the normal vessel operational discharges such as deck drainage, sanitary waste, domestic wastewater, and cooling water (and intake structures associated with it) are covered by the Coast Guard regulations/MARPOL. Or, do you consider the riserless well intervention vessel attached to the facility (well) and engaged in oil and gas activities requiring NPDES General Permit coverage in Part l.A.1? In addition, is it the intent of the NPDES General Permit to cover riserless well intervention vessels or just MODUs with regard to the cooling water intake requirements in Part l.D.3.? The hydrate control fluid discharges will be covered by the NPDES General permit for the well.

Your prompt response to this issue is greatly appreciated. If you have any questions, please give me a call at 832-636-2582.

Thanks,
Katie

Katie Maness
Anadarko Petroleum Corporation
GoM EHS Manager
832-636-2582

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