UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

JUN 10 2015

OFFICE OF
WATER AND WATERSHEDS

Ms. Susan Childs
Alaska Venture Support Integrator Manager
Shell Gulf of Mexico, Inc.
3601 C Street, Suite 1000
Anchorage, Alaska 99503

Re: Coverage for Shell Gulf of Mexico, Inc. to discharge from the *Noble Discoverer* exploratory facility under the National Pollutant Discharge Elimination System (NPDES) General Permit for Oil and Gas Exploration Facilities on the Outer Continental Shelf in the Chukchi Sea (Permit No. AKG-28-8100)

Dear Ms. Childs:

This letter provides the United States Environmental Protection Agency's (EPA) response to the Notice of Intent (NOI) application packages submitted by Shell Gulf of Mexico, Inc. (Shell) requesting permit coverage under the NPDES General Permit for Oil and Gas Exploration Facilities on the Outer Continental Shelf in the Chukchi Sea (Chukchi Sea General Permit).

On January 22 and 29, 2015, Shell submitted initial NOI applications requesting authorization to discharge wastewater to the Chukchi Sea from the *Noble Discoverer* exploratory facility at the Burger F, Burger J, Burger S and Burger V well sites. Shell submitted revised NOI applications on April 21, 2015. The EPA deemed the NOI applications complete on May 19, 2015.

Pursuant to Section I.C.3 of the Chukchi Sea General Permit, Shell is authorized to discharge the following waste streams from the *Noble Discoverer* exploratory facility into the Chukchi Sea at the four proposed well sites, subject to the terms and conditions of the General Permit.

| ***Discharge Number*** | ***Discharge Description*** |
|---|---|
| 001 | Water-Based Drilling Fluids and Drill Cuttings |
| 002 | Deck Drainage |
| 003 | Sanitary Wastes |
| 004 | Domestic Wastes |
| 005 | Desalination Unit Wastes |
| 006 | Blowout Preventer Fluid |
| 007 | Boiler Blowdown |
| 008 | Fire Control System Test Water |
| 009 | Non-Contact Cooling Water |
| 010 | Uncontaminated Ballast Water |
| 011 | Bilge Water |
| 012 | Excess Cement Slurry |
| 013 | Muds, Cuttings, Cement at the Seafloor |

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The EPA has assigned unique permit numbers to the *Noble Discoverer* for each of the four proposed well sites, as identified in the following table. Please use the applicable NPDES permit numbers in all future correspondence and reporting.

***Permit Numbers for the Noble Discoverer under the Chukchi Sea General Permit***

| Permit Number | Lease Block | Well Name |
|---|---|---|
| AKG-28-8101 | 6714 | Burger F |
| AKG-28-8102 | 6912 | Burger J |
| AKG-28-8103 | 6762 | Burger S |
| AKG-28-8104 | 6915 | Burger V |

Please note the Chukchi Sea General Permit imposes effluent limitations and monitoring requirements in Section II and monitoring, recording and reporting requirements in Section III. Discharge Monitoring Reports must be submitted monthly by the 20th day of the following month.

A copy of the Chukchi Sea General Permit is available on the EPA's website at: http://yosemite.epa.gov/r10/water.nsf/npdes+permits/arctic-gp. Facilities discharging under the authority of the Chukchi Sea General Permit must keep a copy of the permit and this coverage letter at the facility where the discharges occur, or retain a copy at the nearest administrative or field office managing the operation.

With this discharge authorization decision, the following permit coverages granted on June 23, 2011 under the NPDES General Permit for Oil and Gas Exploration Activities on the Outer Shelf and Contiguous State Waters for Discharges into the Chukchi and Beaufort Seas, Alaska (Arctic General Permit) are terminated:

| Permit Number | Lease Block | Well Name |
|---|---|---|
| AKG-28-0006 | 6714 | Burger F |
| AKG-28-0004 | 6912 | Burger J |
| AKG-28-0014 | 6762 | Burger S |
| AKG-28-0019 | 6915 | Burger V |

If you have any questions regarding this discharge authorization letter or the Chukchi Sea General Permit, please do not hesitate to contact Erin Seyfried, NPDES Permits Unit, at Seyfried.erin@epa.gov or (206) 553-1448.

Sincerely,

Daniel D. Opalski, Director
Office of Water and Watersheds