Shell Exploration & Production

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Re: Response to EPA Review if Notice of Intent Applications for Discharge Under National Pollutant Discharge Elimination System (NPDES) General Permit for Oil and Gas Exploration Facilities on the Outer Continental Shelf in the Chukchi Sea (No. AKG-28-8100), dated 24 March 2015.

Dear Mr. Lidgard:

Thank you for your review and response to our submission of the Notice of Intent Application (NOI) for Discharge under the National Pollutant Elimination System (NPDES) General Permit for Oil and Gas Exploration Facilities on the Outer Continental Shelf in the Chukchi Sea, offshore Alaska. Shell Gulf of Mexico, Inc. (Shell) would like to take this opportunity to address EPA's review comments, summarized in your letter of March 24, 2015, on the NOI Application under NPDES General Permit AKG-28-8100.

Enclosed with this letter is a Comment Summary RFAI Table listing EPA's review comments and summarizing Shell's responses. Please note some additional minor changes have been incorporated into the attached documents, which are also summarized in the RFAI table. These changes include revisions to Section 4 of the BMP around the local work instruction (LWI); this appendix has been removed from the previous version of the BMP as the LWIs are living documents that were deemed not necessary as part of the BMP.

Also enclosed are the NOI resubmittal packets for each of the Burger sites (F, J, S, and V). Modifications contained in the resubmittal packets include revised projected waste volumes per well, revised treatment process/disposal practice tables, updated sections of the EMP Plan of Study, and updated versions of the BMPs and QAPPs for both drilling units. Additionally, the outfall locations and drilling unit flow diagrams have been incorporated into Appendix A of the BMP for each drilling unit.

Shell appreciates this opportunity to provide this additional information and clarity to EPA's questions and comments. Please contact me at your earliest convenience should you require any additional information. Please feel free to contact me at (907) 646-7112 if you have questions regarding this transmittal.

Thank you,

Susan Childs
Alaska Venture Support Integrator, Manager
Shell Gulf of Mexico, Inc.

Enclosure (s):

- Comment Summary RFAI Table
- Burger F – NOI Resubmittal Packet
- Burger J – NOI Resubmittal Packet
- Burger S – NOI Resubmittal Packet
- Burger V – NOI Resubmittal Packet