



# United States Department of the Interior



MINERALS MANAGEMENT SERVICE  
Alaska Outer Continental Shelf Region  
3801 Centerpoint Drive, Suite 500  
Anchorage, Alaska 99503-5823

DEC 18 2009

Ms. Susan Childs  
Shell Offshore Inc.  
3601 C Street, Suite 1334  
Anchorage, Alaska 99503-5948

Dear Ms. Childs:

The Minerals Management Service (MMS) has completed its review of Shell Gulf of Mexico Inc (Shell) May 2009 Chukchi Sea Regional Exploration Oil discharge Prevention and Contingency Plan (ODPCP) (Revision 0, dated May 2009). The MMS concludes that it is appropriate to group Shell's Sale 193 Chukchi Sea leases and exploration activities under this Regional ODPCP in accordance with 30 CFR 254.3. The MMS hereby approves the Chukchi Sea Regional ODPCP pursuant to 30 CFR 254.2(a) subject to Shell submitting the requested information and complying with the conditions below.

1. Table 1.2-1: Indicate which location will serve as the primary oil spill response center for Tier 2 and Tier 3 events.
2. Table 1.2-2: Update the EPA FOSC with the current contact.
3. Pg 1-28 fourth paragraph: Provide a discussion on why the oil storage tanker could be up to 240 nm from the drill site.
4. Page 1-31 first paragraph: Indicate where oil spill response assets will be pre-staged and what the estimated mobilization, transit and deployment times would be.
5. Figure 3.3-1: Include LOSC under the Incident Command block
6. ACS manual – update the Tactic L3 Deployment Strategies to include transit times to key staging sites in the Chukchi from Prudhoe Bay and/or other areas where significant response assets are located.
7. Provide a copy of the contractual agreement with MSRC for dispersant application services in Appendix B.

Shell is required to conduct a tabletop drill addressing the worst-case discharge scenario prior to drilling activities. Shell is also required to conduct deployment exercises to demonstrate your capability to carry out oil spill response actions described in your ODPCP once your oil spill response assets have moved into the Chukchi and prior to the on-set of drilling activities into liquid hydrocarbon bearing zones. In accordance with 30 CFR 254.42(4)(f) you must notify the

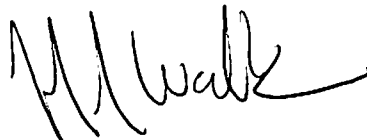


Regional Supervisor at least 30 days in advance of exercises conducted to meet MMS requirements to permit MMS personnel the opportunity to witness any exercises.

As required by 30 CFR 254.30 this plan must be reviewed at minimum every two years and resulting changes submitted to the MMS. If no changes are required, Shell must submit written notification that the plan has been reviewed and that no changes are required. Also Shell must submit revisions of the plan to MMS within 15 days of any changes that negatively impact your spill response capabilities, increase your worst case discharge scenario, involve changes in oil spill removal organizations or there are significant changes to the Area Contingency Plans.

If you have any questions regarding this action please contact Christy Bohl at 907-334-5300.

Sincerely,

A handwritten signature in black ink, appearing to read "J Walker", written in a cursive style.

Jeffrey Walker  
Regional Supervisor  
Field Operations