

CALIFORNIA COASTAL COMMISSION

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ENERGY, OCEAN RESOURCES, AND FEDERAL CONSISTENCY DIVISION REPORT

FOR THE

MAY 13, 2010 MEETING OF THE CALIFORNIA COASTAL COMMISSION

TO: Commissioners and Interested Parties

FROM: Alison Dettmer, Deputy Director
Energy, Ocean Resources & Federal Consistency

IMMATERIAL AMENDMENT		
APPLICANT	PROJECT	LOCATION
E-85-010-A1 Plains Exploration and Production Co. (PXP)	Amend CDP E-85-010 to excavate, inspect and repair two-foot sections of an existing 20-inch Platform Irene oil pipeline within Vandenberg Air Force Base (VAFB).	Vandenberg Air Force Base (VAFB), Santa Barbara County



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NOTICE OF PROPOSED IMMATERIAL PERMIT AMENDMENT

E-85-010-A1

TO: All Interested Parties

FROM: Peter M. Douglas, Executive Director

DATE: April 29, 2010

SUBJECT: Application to amend Coastal Development Permit E-85-010 to excavate, inspect and repair two 40-foot sections of an existing oil pipeline within Vandenberg Air Force Base (VAFB), Santa Barbara County.

The Executive Director has determined that the requested project change described herein may be approved as an immaterial amendment to the above-referenced coastal development permit (CDP). The amendment would result in a minor change to the CDP, which allowed Union Oil Company to install oil, natural gas and produced water pipelines through the coastal zone from the offshore Platform Irene to the onshore Lompoc Oil and Gas Plant.

Background: On August 30, 1985, the Commission approved CDP E-85-010 allowing Union Oil Company to install oil, natural gas and produced water pipelines through the coastal zone from the offshore Platform Irene to the onshore Lompoc Oil and Gas Plant. In 2002, the applicant, Plains Exploration and Production Company (PXP), purchased and assumed legal ownership of Platform Irene and its associated pipelines, infrastructure and operating authorizations (including CDP E-85-010).

Requested Amendment and Project Description: PXP proposes to excavate, inspect and repair (if necessary) two approximately 40-foot long segments of the existing 20-inch diameter Platform Irene oil pipeline located on the VAFB. These pipeline segments are located directly to the east and west of PXP's pipeline valve site number two, an approximately 60-foot by 60-foot fenced-in gravel area containing above-ground pipeline infrastructure and metering equipment. During a September 2009 internal pipeline inspection, the pipeline segment immediately to the west of valve site number two was identified as potentially requiring repair. Because the pipeline segment immediately to the east of valve site number two was installed at the same time as the segment to the west, PXP proposes to excavate and evaluate the integrity of this pipeline segment as well.

PXP proposes to excavate the pipeline segments with a maximum 40-foot long by 24-foot wide by five-foot deep trench (154 cubic yards of soil) at each location. PXP would then perform

visual and diagnostic tests to evaluate the results of the internal inspections and, if necessary, proceed to reinforce any corroded sections of pipeline.

Repair work, if deemed necessary, would consist of either welding full encirclement steel split sleeves to the exterior of the pipeline sections that have corroded or wrapping the pipeline with composite reinforcing sleeves. Cutting the pipeline is not proposed during any phase of inspection or repair. The oil pipeline would remain in use and PXP will implement operational procedures specifically designed for welding on an “in-service” pipeline.

Although all project work would be carried out on the exterior of the pipeline, there will be a vacuum truck and oil spill response equipment trailer staged onsite during all project activities. PXP’s pipeline excavation and repair plans must be reviewed and approved by Santa Barbara County’s System Safety and Reliability Review Committee (SSRRC) prior to initiation of project activities, to ensure that erosion control measures are adhered to and that any restoration work is completed in compliance with regulatory agency requirements. All VAFB Civil Engineering Squadron and environmental services staff requirements have been incorporated into the project design.

Findings: The proposed amendment has been deemed “immaterial” for the following reasons:

- Public Access and Traffic: The project site is located in a restricted area of VAFB that is not accessible to the general public. At least one lane of the adjacent two-lane road would remain open at all times and coastal and/or shoreline access would not be restricted during proposed work.
- Oil and Hazardous Substance Spills: The project is proposed as an oil spill prevention measure -- to address pipeline corrosion that could eventually result in a discharge of oil. All proposed inspection and repair work is limited to the exterior of the pipeline. However since heavy equipment is involved, there is the potential for an accidental breach of a pipeline. PXP will therefore have on-site a vacuum truck and oil spill response equipment trailer as required by its oil spill contingency plan and Santa Barbara County.
- Environmentally Sensitive Resources: The project would be carried out within a previously disturbed pipeline corridor. Biological surveys of the proposed excavation site and project staging areas carried out by PXP’s consultant biologist in coordination with VAFB biologists did not record the presence of any sensitive species or habitats. A population of coastal buckwheat (*Eriogonum parviflorum*) plants is adjacent to the project site, however. This species is the host plant for the El Segundo blue butterfly, *Euphilotes battoides allyni*, (ESBB) a federally listed species that has been observed at several locations on VAFB (the nearest of which is approximately two miles from the proposed project site). The ESBB is closely linked to the coastal buckwheat plant and the butterfly typically remains within the immediate vicinity of its host plant during all life stages. To minimize the potential for the ESBB or its host plant to be adversely affected by the proposed project, PXP has worked with VAFB biologists to flag all coastal buckwheat plants in the vicinity of the project site and surround these flagged plants with temporary fencing with a minimum buffer distance of

three feet. In addition, PXP has committed to carry out all project activities outside of the ESBB's flight season, thereby ensuring that all ESBB's potentially located near the project site would be immobile and in their pupal stage of development. ESBB pupa are known to remain within the surface soil and leaf litter directly below their host plant until the flowering of the host plant triggers emergence of the butterfly and the beginning of the flight season. Completion of the project prior to the flight season will eliminate or significantly reduce the likelihood of any impacts to ESBB and its habitat.

- Cultural Resources: The project site is a previously disturbed pipeline corridor. It does not contain cultural or archeological resources.
- Temporary Impacts: The project would be carried out within approximately two weeks, after which time the excavation site would be backfilled, topped with the topsoil preserved during initial excavation and revegetated naturally.

Immaterial Permit Amendment

Pursuant to the California Code of Regulations—Title 14, Division 5.5, Volume 19, section 13166(b)—the Executive Director has determined this amendment to be IMMATERIAL.

Pursuant to section 13166(b)(1), if no written objection to this notice of immaterial amendment is received at the Commission office within ten (10) working days of mailing said notice, the determination of immateriality shall be conclusive and the amendment shall be approved.

Pursuant to section 13166(b)(2), if a written objection to this notice of an immaterial amendment is received within ten (10) working days of mailing notice, and the executive director determines that the objection does not raise an issue of conformity with the Coastal Act or certified local coastal program if applicable, the immaterial amendment shall not be effective until the amendment and objection are reported to the Commission at its next regularly scheduled meeting. If any three (3) Commissioners object to the executive director's designation of immateriality, the amendment application shall be referred to the Commission for action as set forth in section 13166(c). Otherwise, the immaterial amendment shall become effective.

Pursuant to section 13166(b)(3), if a written objection to this notice of an immaterial amendment is received within ten (10) working days of mailing notice, and the executive director determines that the objection does raise an issue of conformity with the Coastal Act or a certified local coastal program if applicable, the immaterial amendment application shall be referred to the Commission for action as set forth in section 13166(c).

If you wish to register an objection to this notice, please send the objection in writing to Cassidy Teufel at the above address. If you have any questions, you may contact him at (415) 904-5502 or via email at cteufel@coastal.ca.gov.