

November 9, 2021

Mr. Benjamin Laws
Office of Protected Resources
NOAA Fisheries
U.S. Department of Commerce
(301) 427-8425
Benjamin.Laws@noaa.gov
National Marine Fisheries Service
Incidental Take Program
[submitted via email to: Benjamin.laws@noaa.gov]

Subject: Request for an LOA

Dear Mr. Laws:

RPS has been contracted by W&T Offshore Inc. to prepare a request for Letter of Authorization (LOA) for survey activities to be undertaken by Echo Offshore, LLC in the Gulf of Mexico as described below.

Proposed Activities

Echo Offshore, LLC of Prairieville, Louisiana is proposing to conduct an archaeological and geohazards survey for W&T Offshore Inc., of Houston, Texas, in the Eugene Island (EI) Area, Block EI389 and portions of Blocks EI385 and EI386, and in the Ewing Bank (EW) Area, in the E/2 portion of Block EW979. This survey work is proposed to occur in waters ranging in depths of between approximately 420 and 472 feet (128 and 143 meters). The archeological and geohazards survey work is proposed to occur over a 5-7-day period between December 1, 2021 and March 1, 2022 (Winter 2021 timeframe [i.e., November – March]); this timeframe is dependent upon approval of Bureau of Ocean Energy Management (BOEM) permit (G&G Permit Form: Form BOEM-0327) required for conducting geological or geophysical exploration for mineral resources or scientific research on the Outer Continental Shelf (OCS), weather conditions, and vessel crew-availability.

The remote sensing survey will be performed aboard the Research Vessel (R/V) Nikola, a 130-foot by 32-foot research vessel with survey personnel and 24-hour operations, operated by Echo Offshore, LLC. The survey is designed to satisfy BOEM's requirements for geohazards and archaeological assessments in the Gulf of Mexico OCS.

Echo's survey operations will consist of utilization of high frequency survey instruments for the purpose of locating hard bottom areas, debris, hazardous geologic formations, reefs, outcrops, etc. No equipment with an entanglement or entrapment risk will be used during this survey in the Eugene Island and Ewing Bank Areas. Remote sensing equipment will be towed utilizing cables varying from 3/8-inch to 1/2-inch diameter. The following instruments and/or technique(s) will be used in the survey operations:

- QPS QINSy Survey hydrographic software suite

- Sonardyne Wideband Fusion Ultra-Short-Baseline (USBL) System
- Veripos LD2 Integrated Mobile Positioning Unit/Veripos Ultra Acoustic Positioning Service System
- EdgeTech Discover Modular Acquisition and Processing software package system
- EdgeTech 4200-FS (SP) 100/ 410 KHz side scan sonar
- EdgeTech 3100 Chirp sub-bottom profiling system
- SBE 19plus V2/ SEACAT Profiler Conductivity, Temperature and Pressure Recorder with Rs-232 Interface
- Teledyne Odom Echotrac DF MKIII digital precision dual frequency echosounder & TSS CMS25 motion sensor
- Marine Magnetics SeaSPY Overhauser magnetometer
- Hydrosience technologies Inc HGSI 20-cubic inch sleeve gun, SeaMUX NTRS2 QAI Digital recording system & streamer cable leveling system (DigiBIRD Model 5010)
- Primary and Spare Acquisition/Navigation Computers
- Primary and Spare Data Processing Computers
- Air Compressor

The towed, high-resolution survey in the Eugene Island and Ewing Bank Areas will not use new or unusual technology (NUT) for this survey work. Information about the conventional equipment and technologies being used is presented in the survey equipment table included in the enclosed attachment for the LOA. In addition, details about and figures showing the survey locations, the R/V Nikola and equipment towing operations, calculation results of National Marine Fisheries Service (NMFS) Gulf of Mexico exposure estimation tool for Zones 2 and Zone 5, and the spec sheets for survey equipment being used by Echo Offshore LLC during the survey are in the enclosed attachment.

Proposed Protected Species Monitoring and Mitigation

Protection measures designed to mitigate the potential environmental impacts to marine mammals consistent with those described in the Biological Opinion Appendix A will be implemented throughout the survey program including use of trained and experienced NMFS-approved Protected Species Observers (PSO), as described in the Appendix. Passive Acoustic Monitoring (PAM) will not be implemented since survey activities will employ only a single sleeve gun such that they fall under the requirements for shallow penetration protocols where PAM is not required.

The following mitigation measures will be implemented during the execution of the survey in accordance with requirements for high-resolution surveys detailed in the NMFS 2020 Biological Opinion¹, NMFS Amended Incidental Take Statement², and BOEM Notice to Lessees³:

¹ National Marine Fisheries Service (NMFS). 2020. *Biological Opinion on BOEM Gulf of Mexico Oil and Gas Program*. Office of Protected Resources. National Oceanic and Atmospheric Administration. National Tracking No. FPR-2017-92341. March 13.

² NMFS. 2021. Amended Incidental Take Statement on BOEM Gulf of Mexico Oil and Gas Program Tracking No. FPR-2017-9234. April 26.

³ Bureau of Ocean Energy Management (BOEM). 2020. *Notice to Lessees and Operators of Federal Oil and Gas, and Sulphur Leases in the Gulf of Mexico OCS: Implementation of Seismic Survey Mitigation Measures and Protected*

- Trained and experienced, NMFS-approved PSO will be aboard the R/V Nikola during survey activities to conduct the monitoring for protected species, record and report detections, and request mitigation actions in accordance with the established regulatory requirements and monitoring plan.
- Visual monitoring of the exclusion zone utilizing a team of four trained PSOs with one on shift at a time will be maintained during the survey operations.
- A period of pre-clearance observation (for example, 30 minutes) before survey operations begin will be carried out and if no protected species are observed surveying will commence.
- No ramp-up will be required as the survey is using only a single sleeve gun as specified in the shallow penetration protocols listed in the NMFS 2020 Biological Opinion Appendices.
- The 100-meter exclusion zone monitored will be expanded to 500 meters in the event that baleen whale, sperm whale, beaked whale or Kogia spotting occurs within the zones. The PSO on duty will have authority to shutdown survey operations in the event protected species are detected or there is uncertainty in identifying a marine mammal.
- The survey will recommence after the animal has exited the exclusion zone or following a 30-minute period where the animal is longed observed.
- Low frequency sources (operating below 180 kHz), including the 20-cubic inch single sleeve gun being used for monitoring and mitigation, will be conducted to minimize potential impacts to protected species. Other equipment that either did not produce sound or produced sound outside of the hearing range of protected species and, as such, not regulated by BOEM or NMFS, will be operated by the R/V Nikola.

The subbottom profiler and sleeve gun will be operated simultaneously for approximately 2.5 days. The majority of the single sleeve gun activities will occur in Zone 5 waters and the remaining survey work will be conducted 50 percent of the time in Zone 2 waters and 50 percent in Zone 5 waters.

Should you have any questions or comments regarding the enclosed request, please feel free to contact Mr. Madison Woodward, Geological Advisor, W&T Offshore Inc. or Matt Keith, Echo Offshore's Vice President and Geoscience Manager. The contact information for the W&T Offshore and ECHO Offshore staff is as follows:

Madison Woodward, Geological Advisor, W&T Offshore Inc.

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Matt Keith, Vice President/Geoscience Manager, Echo Offshore LLC

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We thank you in advance for your time. We look forward to working with you and your team on the finalization and acceptance of the LOA application.

Sincerely,

A handwritten signature in cursive script, reading "Richard G. Zeroka".

Richard G. Zeroka (on behalf of W&T Offshore Inc.)
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cc:

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