

## McNeill, Catherine

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**From:** Comeaux, Jude <jude.comeaux@powereng.com>  
**Sent:** Wednesday, November 12, 2025 2:30 PM  
**To:** PermitsMail  
**Cc:** ernie.ladkani@enbridge.com  
**Subject:** Kaskida Oil Export System Pipeline, Enbridge, Consistency Review/Determination Request  
**Attachments:** Kaskida Oil - ADEM Consistency Package - Rev 1.pdf; 01 Cover Sheet Executive Summary.pdf; 02 Procedural Narrative.pdf; 05 Onshore Base(s).pdf; 16 MAP OF KASKIDA PROJECT LOCATION PROX. TO MILITARY WARNING AREAS.pdf; 17 Rice's Whale Area Map - Kaskida Oil Pipeline.pdf; Cover Letter Kaskida Oil - BSEE ROW PERMIT APPLICATION.pdf

You don't often get email from jude.comeaux@powereng.com. [Learn why this is important](#)

Dear ADEM Coastal Programs Staff,

Hello and good day.

On behalf of our client, Enbridge Offshore Facilities, LLC (Enbridge), we are hereby submitting a Consistency Review/Determination Request for activities located in the Outer Continental Shelf, Gulf of America. Provided is our cover letter outlining our specific request, location information, drawings and other supporting information which details the anticipated work, associated with the Kaskida Oil Export System Pipeline.

We will provide separately the Consistency Certification once the Consistency Review commences. Also, please remit the invoice to so that we may pay the processing fee.

Please let me know if you have any questions.

Thank you in advance for your assistance with this request.

Sincerely,

**Jude M. Comeaux**  
Senior Project Manager | Area Lead | Environmental Division  
**POWER Engineers, Inc., Member of WSP**  
337-303-3854 | Cell  
225-590-3995 | Computer Phone

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POWER ENGINEERS, INC.  
2341 SOUTH ACADIAN THRUWAY  
SUITE 560  
BATON ROUGE, LA 70808 USA

PHONE 225-590-3995

November 12, 2025

State of Alabama  
Department of Environmental Management  
Coastal Program

via email: [permitsmail@adem.alabama.gov](mailto:permitsmail@adem.alabama.gov)

**RE: Coastal Zone Management Area, Consistency Review/Determination Request  
Enbridge Offshore Facilities, LLC  
Proposed Kaskida Oil Export System Pipeline  
Keathley Canyon Area Block 293 to Green Canyon Area Block 19  
Gulf of America, Outer Continental Shelf**

Dear Madame/Sir,

On behalf of our client, Enbridge Offshore Facilities, LLC (Enbridge), we are hereby submitting a Consistency Review/Determination Request for the above referenced activities located in the Outer Continental Shelf, of the Gulf of America. Attached to the request is location information, drawings and other supporting information which details the anticipated work.

Enbridge is planning to build, own and operate the Kaskida Oil Export Pipeline system, consisting of a 18-inch Steel Catenary Riser (SCR) and 12-inch / 26-inch bi-directional pipeline from Kaskida Floating Production Unit platform in Keathley Canyon (KC) Area Block 293 to a new installed riser and pig receiver at Boxer Platform in Green Canyon Area Block 19, approximately 136.2 miles in length. Enbridge has made application to the United States Department of the Interior, Bureau of Safety and Environmental Enforcement for a new pipeline right-of-way and associated segment number for the proposed Kaskida Oil Pipeline – including 18-inch SCR, 24-inch / 26-inch pipeline, 20-inch spools, and a Subsea Isolation Valve Skid, 20-inch fixed riser and pig receiver.

The subject pipeline activities would occur offshore of Louisiana, although the State of Louisiana (Port Fourchon, LA) and the State of Alabama (Mobile, AL) territorial waters would serve as shore base for the planned activities. Therefore, Enbridge hereby requests a consistency review / determination request of the proposed activities.

Please remit the Coastal Zone Management Consistency Fee invoice to my attention for remittance.

Should you have additional questions regarding this Consistency Review/Determination Request, or if additional information is required, please contact me 225-590-3995 (office), 337-303-3854 (cell) or by email at [jude.comeaux@powereng.com](mailto:jude.comeaux@powereng.com). Thank you for your consideration in this matter.

Best Regards,

**POWER Engineers, Inc.**

A handwritten signature in blue ink that reads "Jude M. Comeaux".

Jude M. Comeaux  
Senior Project Manager – Environmental

Attachments: Project related supporting documents  
Copy: Enbridge



**Enbridge Offshore Facilities, LLC**  
**Energy Center Five**  
915 N. Eldridge Parkway, Suite 1100  
Houston, Texas 77079

July 7, 2025

**VIA TIMS Web**

Ms. Angie Gobert - GE1035A  
Chief of Pipeline Section  
U.S. Department of the Interior  
Bureau of Safety and Environmental Enforcement  
1201 Elmwood Park Boulevard  
New Orleans, Louisiana 70123-2394

Re: **ENBRIDGE OFFSHORE FACILITIES, LLC** Application for an 24-inch/26-inch Oil Export Right of Way Pipeline (including 18-inch steel catenary riser) to be installed in and/or through Blocks 293, 249, 250, 251, 207, 208, 164, 165, 166, 122, 123, 79, 80, 36, 37 in the Keathley Canyon area, Blocks 1005, 961, 962, 918, 874, 875, 831, 832, 788, 789 in the Garden Banks Area, and Blocks 749, 750, 706, 707, 708, 664, 665, 621, 622, 578, 534, 535, 491, 492, 493, 448, 449, 405, 406, 362, 363, 319, 275, 231, 187, 143, 144, 145, 146, 100, 101, 102, 103, 59,58, 60, 61, 17, 18, 19 in the Green Canyon Area, OCS Federal Waters, Gulf of America, Offshore, Louisiana.

Dear Ms. Gobert:

Pursuant to the authority granted Section 5(e) of the Outer Continental Shelf Lands Act (67 Stat. 462, 43 U.S.C. 1331 et seq.), as amended (P.L. 95-372, 92 Stat. 629), and the regulations contained in 49 CFR Part 195 and 30 CFR Part 250 Subpart J, ENBRIDGE OFFSHORE FACILITIES, LLC ("Enbridge"), is filing this application via TIMS Web for a right of way two hundred feet (200 ft) in width for the construction, operation and maintenance of a proposed 24-inch/26-inch oil export pipeline ("Kaskida Oil Pipeline") with 18-inch steel catenary riser (SCR) from BP's Kaskida Platform in Keathley Canton 293 in and through blocks 293, 249, 250, 251, 207, 208, 164, 165, 166, 122, 123, 79, 80, 36, 37 in the Keathley Canyon area, Blocks 1005, 961, 962, 918, 874, 875, 831, 832, 788, 789 in the Garden Banks Area, and Blocks 749, 750, 706, 707, 708, 664, 665, 621, 622, 578, 534, 535, 491, 492, 493, 448, 449, 405, 406, 362, 363, 319, 275, 231, 187, 143, 144, 145, 146, 100, 101, 102, 103, 59,58, 60, 61, 17, 18, 19 in the Green Canyon Area to a Subsea Isolation Valve (SSIV) Skid and through a 20-inch fixed riser and pig receiver to the Boxer Platform A (Boxer) in Green Canyon Area Block 19. OCS Federal Waters, Gulf of America, Offshore, Louisiana.

The proposed right of way pipeline will originate at the BP operated Kaskida Floating Production Unit (FPU) in Keathley Canyon 2032 over a distance of 738,348 U.S. survey feet (139.84 U.S. survey miles) to a subsea tie-in via spools to a subsea isolation valve (SSIV), riser and pig receiver at Boxer Platform in Green Canyon 19. The Kaskida FPU is located in a water depth of 5,500 feet, and the pipeline route is in water depths range of 6,500 to 750 feet. The Kaskida Oil Pipeline will start at the steel catenary riser (SCR) hang-off location on the Kaskida FPU. The pipeline will

terminate with a closing spool assembly, connected to the Boxer Platform in Green Canyon Block 19.

Enbridge will build, own, and operate the SCR, pipeline, spools, SSIV, riser, and pig receiver.

The proposed pipeline construction installation window is first quarter (1Q) 2027 to 2Q 2028. The pipeline will be installed by conventional S-Lay method with a dynamically positioned pipeline installation vessel. The SCR will be "wet parked" on the seabed prior to the FPU arriving on site. Proposed SCR recovery and hang-off from the FPU riser porch is approximately 3Q 2028. This operation will be performed by a dynamically positioned vessel by BP. Proposed installation window for the spools, SSIV and fixed riser at Boxer GC-19 is first quarter (1Q) 2027 to third quarter (3Q) 2027. Proposed closing spool installation at Boxer GC19 date is approximately 3Q 2028. These will be installed by divers and performed using a dynamically positioned dive support vessel. Base of operation for the construction activities will be Port Fourchon, LA and Mobile, AL for the Pipelay Contractor and Diving Contractor. Mobile, AL will be the base of operations for the SCR Hang-Off Contractor.

Enbridge recognizes our proposed pipeline route and/or routes to be taken by boats and aircraft in support of our proposed activities will traverse Military Warning Areas W-453 and W-92. Enbridge will contact the appropriate individual military command headquarters for a list of contacts concerning the control of electromagnetic emissions and use of boats and aircraft in warning areas before commencing such traffic.

In accordance with applicable regulations, Enbridge has delivered a copy of the application and attachments thereto by certified mail - return receipt requested, to each lessee or right-of-way or easement holder whose lease, right-of-way or easement is affected. A list of such lessees or right of way or easement holders is attached and copies of the return receipts showing the date and signature as evidence of service upon such lessees or right of way or easement holders will be forwarded to your office when received. The proposed pipeline does not adjoin or subsequently cross any state submerged lands.

In accordance with applicable regulations, the following materials will be attachments to this application:

1. Cover Sheet Executive Summary
2. Procedural Narrative
3. Pipeline/Riser Design
4. Pipeline Integrity (Cathodic Protection, Coatings)
5. Onshore Base(s)
6. Safety Flow Schematic
7. Proposed Points ASCII File
8. Certified Pipeline Plat Map
9. Acronyms
10. Shallow Hazard Report (NCIS)
11. Employment Non-Discriminatory Statement
12. Departure/Alternate Compliance Requests
13. Description and Pipeline Crossing Design Schematic – (attachment includes Designated Oil and Gas Lease Operators and Right of Way Holders)
14. Worst Case Discharge Calculation
15. CZMA Certification (NCIS)
16. Map of Kaskida Project Location Proximity to Military Warning Areas

## 17. Rice's Whale Area Map

Enclosed is Enbridge's Pay.Gov receipt in the amount of \$3,223.00 covering the application fee. Enbridge will also submit payment to ONRR in accordance with Title 30 CFR 250 Subpart J, 250.1012 (d) five-year rental payment.

The subject pipeline has a worst-case discharge of approximately 358,855 barrels; therefore, Oil Spill Financial Responsibility coverage is required. As the operator of the pipeline, Enbridge Offshore Facilities will cover this right of way pipeline under its current Certification of Oil Spill Financial Responsibility by modifying its Oil Spill Response Plan to include this pipeline at the appropriate annual update.

In accordance with the requirements of Title 30 CFR 250, Subpart I, Enbridge will nominate a Design, Fabrication, and Installation CVA for the SCR.

The design of the pipeline is in accordance with the "Minimum Federal Safety Standards" (Department of Transportation) Title 49 CFR Part 195. Enbridge agrees to be bound by the foregoing regulations and further agrees to comply with the applicable stipulations as set forth in Title 30 CFR 250 Subpart J, latest edition, and that certain letter to lessees dated April 18, 1991.

In accordance with *Notice to Pipeline Right of Way Holders in the Outer Continental Shelf, Gulf of America OCS Region and Atlantic OCS, Area Coastal Zone Management Program Requirements for OCS Right of way Pipeline Applications*, NTL 2007-G20, and 15 CFR 930.53(d), a consistency certification and supporting documentation will be sent to the Coastal Management Division, Department of Natural Resources for the State of Louisiana and Alabama. A copy of each consistency certification is enclosed. Proof of delivery will be forwarded to your office once received.

Additionally, Enbridge expressly agrees that if any site, structure, or object of historical or archeological significance should be discovered during the conduct of the operations within the permitted right of way, Enbridge shall immediately report such findings to the Regional Manager, Gulf of America OCS Region, and Enbridge will make every effort to preserve and protect the cultural resource from damage until said Regional Manager has given directions as to its preservation.

According to *NTL 2009-G40 Notice to Lessees and Operators of Federal Oil, Gas and Sulphur Leases and Pipeline Right-of-Way Holders, Outer Continental Shelf, Gulf of Mexico OCS Region, Deepwater Benthic Communities*, the proposed Enbridge oil export pipeline centerline is located approximately 126 ft southwest of a "verified cold seep" feature confirmed during a December 2024 ROV survey. CSA Ocean Sciences Inc. prepared a benthic habitat assessment report describing their findings from the ROV survey. According to the CSA report, the seep "appears microbially active and could be considered a chemosynthetic community". The seep "does not support high-density benthic communities composed of bathymodiolin mussels, clams, or tubeworms" but has "the potential to support chemosynthetic communities" and could be "a potential precursor to sensitive habitat". As high-density chemosynthetic and benthic communities are not interpreted to be currently present on the cold seep feature, Enbridge requests a concession to reduce the

required 250 ft separation distance between the proposed oil pipeline route and the cold seep feature. Additionally, Enbridge will ensure a very narrow lay corridor of +/- 10 ft to ensure there is minimal disturbance in the buffer zone. The proposed route is chosen due to presence of very narrow corridor parallel to the existing faults leading to an area of lower seafloor gradients as it traverses across the escarpment. While there are other locations to route the pipeline across the escarpment, those areas in the north and south of the proposed escarpment crossing location pose a higher risk for overstressing and spanning over the 30-year design life of the system. There is no additional pipeline feature (e.g. future tie-ins, valves, sleds, other structures) present at this location and therefore will not require operational intervention at this location. Please be advised that Enbridge will be using a state-of-the-art dynamically positioned deepwater pipelay vessel to ensure that any seafloor disturbance resulting from the oil pipeline construction activities does not occur in such areas or outside of the proposed right of way.

Enbridge hereby agrees to keep open at all reasonable times for inspection by the BSEE, the area covered by this right of way and all improvements, structures and fixtures thereon and all records relative to the design, construction, operation, maintenance and repairs, or investigations or with regard to such area.

Please refer to qualification card on file for GOM COMPANY # 3141 for a list of the approved by the Board of Directors authorizing the undersigned to sign for and on behalf of Enbridge. Additionally, Enbridge has an approved \$300,000 Right of Way Bond on file with BSEE, covering installation of right of way pipelines in OCS Federal Waters, Gulf of America.

If the above and attached information meets with your approval, please issue the necessary permit for the right of way at your earliest convenience. Inquiries concerning this application may be directed to Valorie Staley 832-589-5449.

Sincerely,

*Scott Brunasso*

Scott Brunasso (Jul 9, 2025 08:04 GMT+3)

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Scott R. Brunasso  
Vice President

Enclosures

## PROCEDURAL NARRATIVE

BP is developing the Kaskida & Tiber Fields located in the US OCS waters in the Keathley Canyon (KC) area of central deep-water Gulf of America. These Field Developments are comprised of a semi-submersible Floating Production Unit (FPU) which will receive production fluids from each Field's subsea production / drill center. The Kaskida FPU will process the production fluids and export the processed oil and gas via dedicated pipelines for each oil and gas stream via the Kaskida Oil Export Pipeline and the Kaskida Gas Export Pipeline, which tie-in to existing oil and gas distribution networks in the Gulf of America.

The Kaskida Oil Export Pipeline is initiated with an 18-inch Steel Catenary Riser (SCR) to be hung-off from the Kaskida FPU in KC 293 and transitions to a 24-inch pipeline after touchdown and later transitions to 26-inch pipeline for the last 45 miles of the pipeline system. The oil delivery location is the Boxer Platform in Green Canyon GC 19, from where it will be transported to onshore facilities by Others. The pipeline will tie-in to the Boxer Platform via 20-inch spools, SSIV and riser. The Kaskida Oil Export Pipeline will be piggable.

The Boxer Platform tie-in spools will be 20-inch rigid pipe. A reducer at the 26-inch pipeline termination facilitates the step-down in size to the 20-inch diameter spool. A combination of weld neck and misalignment flanges is used to facilitate the connections from the pipeline end to the riser at the platform. A 20-inch Subsea Isolation Valve (SSIV) skid will be incorporated into the spool. The final fabrication of the spools will be performed based on metrology measurements taken after installation of the pipeline.

The offshore activities are scheduled to start on first quarter (1Q) 2027 for a period of approximately 215 days of activity.

1. The proposed pipeline construction installation window is first quarter (1Q) 2027 to 2Q 2028. The pipeline will be installed by conventional S-Lay method with a dynamically positioned pipeline installation vessel. The SCR will be "wet parked" on the seabed prior to the FPU arriving on site.
2. Proposed SCR recovery and hang-off from the FPU riser porch is approximately 3Q 2028. This operation will be performed by a dynamically positioned vessel by BP.
3. Proposed installation window for the spools, SSIV and fixed riser at Boxer GC-19 is first quarter (1Q) 2027 to third quarter (3Q) 2027.
4. Proposed closing spool installation at Boxer GC19 date is approximately 3Q 2028. These will be installed by divers and performed using a dynamically positioned dive support vessel.
5. Base of operation for the construction activities will be Port Fourchon, LA and Mobile, AL for the Pipelay Contractor and Diving Contractor. Mobile, AL will be the base of operations for the SCR Hang-Off Contractor.
6. Time required to install pipeline:

PROCEDURAL NARRATIVE

- a. 2 weeks for SCR installation (wet park on seabed)
- b. 10 weeks for pipeline installation
- c. 7 days for SCR recovery and transfer / hang-off
- d. 7 days for spool installation at GC19

## ONSHORE BASE(S)

The major offshore installation activities will take place in two campaigns.

Campaign #1 will be the installation and wet park of the riser and on-bottom pipeline and GC19 spools and riser installation. The onshore base for construction of Campaign #1 will be Port Fourchon, Louisiana and Mobile, Alabama.

Campaign #2 will be the hang-off of the riser to the Tiber FPU. The onshore base for construction of Campaign #2 will be Mobile, Alabama.

COVER SHEET EXECUTIVE SUMMARY

# Kaskida Oil Export Pipeline

## Kaskida Oil Export Pipeline BSEE Right-of-Way Application

COVER SHEET EXECUTIVE SUMMARY

Enbridge Offshore Facilities, LLC (“Enbridge”) is planning to build, own, and operate the Kaskida Oil Export Pipeline system, consisting of an 18-inch SCR and 24-inch / 26-inch bidirectional pipeline from Kaskida FPU platform in KC 293 to a new installed riser and pig receiver at Boxer Platform in Green Canyon 19 (water depth approximately 750 feet).

Figure 1 provides a schematic of the Kaskida Oil pipeline. Figure 2 provides a layout of the subsea spools at Boxer platform.

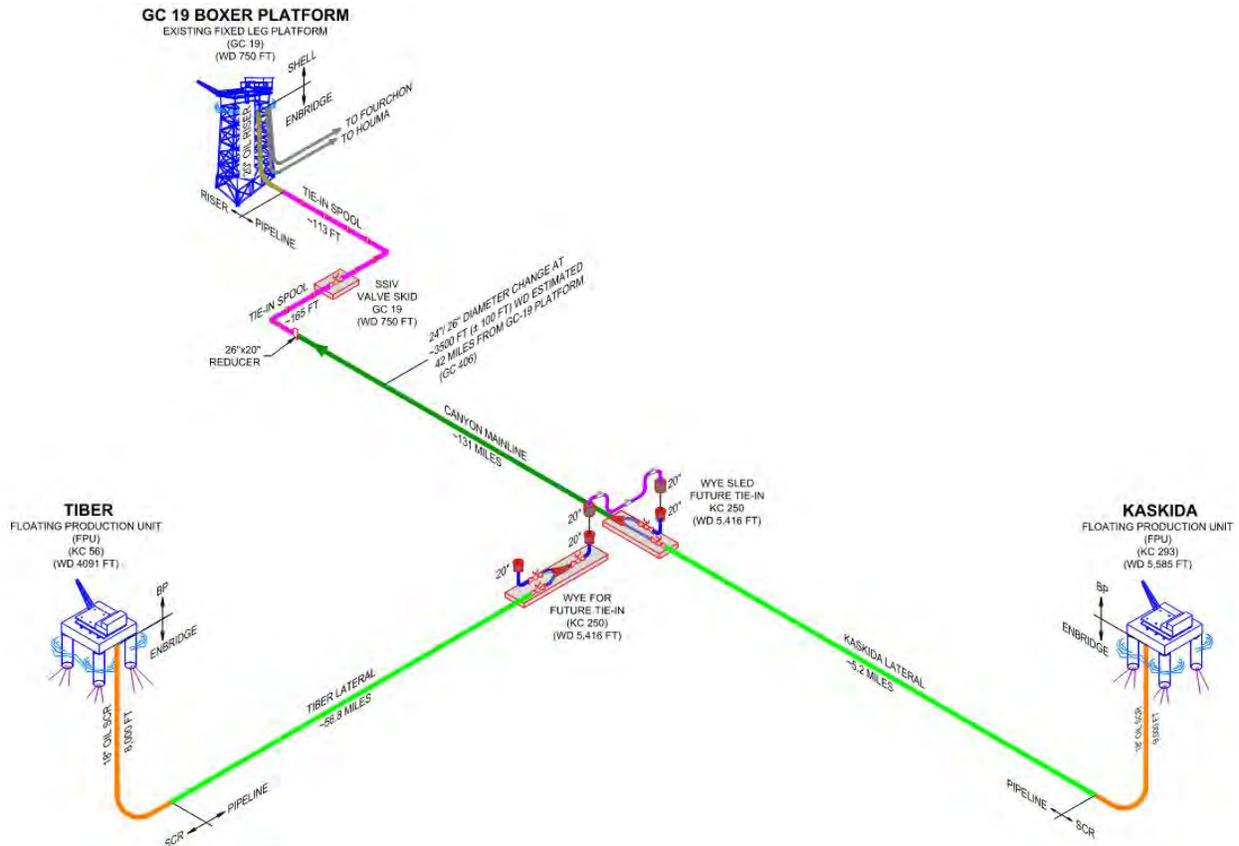
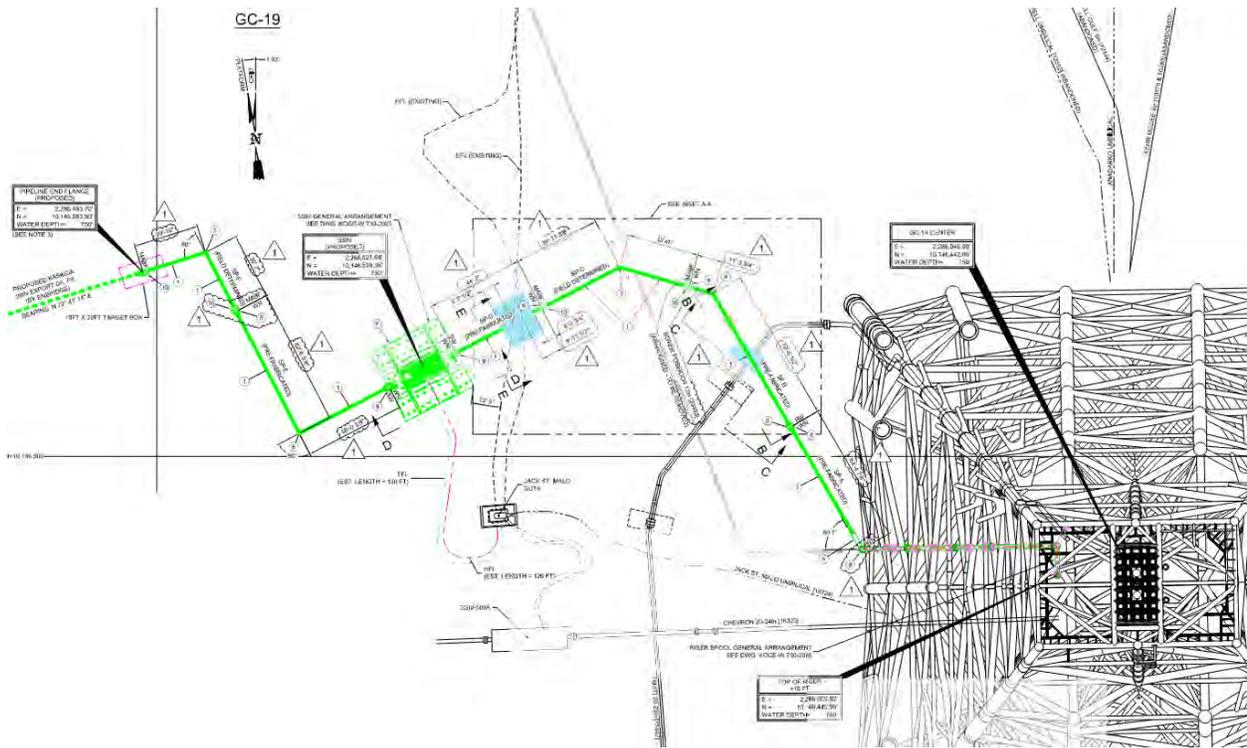


Figure 1 – Kaskida Oil Pipeline to Shell Boxer Platform Schematic

COVER SHEET EXECUTIVE SUMMARY



**Figure 2 – Kaskida Oil Pipeline Tie-in Spool Layout at GC19**

Table 1 provides a breakdown of the permitting for the Kaskida oil pipeline system.

**Table 1 – Kaskida Oil Pipeline Segments**

No.	Segment	ROW Holder / Operator	Type of Permit
1	Kaskida Oil SCR & On-Bottom Pipeline, GC19 SSIV skid, spools, riser and pig receiver.	Enbridge Offshore Facilities, LLC	DOT/ROW

Enbridge is applying for a new segment number for the proposed Kaskida Oil Pipeline – including 18” SCR, 24” / 26” pipeline, 20” spools, and a Subsea Inline Valve (SSIV) Skid, 20” fixed riser, and pig receiver.

The battery limits of this segment are from the SCR hang-off on the Kaskida FPU, through the pipeline, and ending at the pig receiver on the Boxer Platform in GC19. The horizontal distance from the SCR stress joint on the FPU in its mean position to the SCR touchdown point is 3,275 ft. The water depth at the mean touchdown point is 5,606 ft. The starting point for the proposed BSEE Pipeline Right-of-Way is at the SCR temporary laydown head flange location. Some particulars of interest are:

## COVER SHEET EXECUTIVE SUMMARY

- The pipeline will be a DOT Right of Way (ROW) pipeline as defined in 30CFR250.1001
- The SCR consists of 18.00" OD x 1.100" WT API 5L X65 line pipe.
- The pipeline consists of 488,443 feet of 24.00" OD x 1.188" WT API 5L X70 line pipe and 240,689 feet of 26.00" OD x 1.050" WT API 5L X70 line pipe.
- Tie-in spools will consist of 20.00" OD x 1.200" WT API 5L X65 line pipe.
- Fixed riser at Boxer platform will consist of 20.00" OD x 1.200" WT API 5L X65 line pipe.
- The total length of the SCR, pipeline, and spools is approximately 738,348 ft (139.8 miles)
- Maximum water depth is approximately 6,589 ft and minimum water depth is approximately 750 ft near the Boxer platform (in GC 19).
- System design pressure is 4,070 psi at 90 ft above MSL; minimum hydrotest pressure is 5,088 psi at same reference elevation.
- There are expected to be 4 cable crossings, 2 umbilical crossings, and 8 pipeline crossings.

The Kaskida Oil Pipeline has been designed in accordance with 30 CFR 250 (Subpart J), 49 CFR Part 195, and industry standards. The SCR has been designed in conformance with 30 CFR 250 (Subpart J), 49 CFR Part 195, and API RP 2RD. Figure 3 shows the applicability of various industry regulations, codes, and standards for this system.

COVER SHEET EXECUTIVE SUMMARY

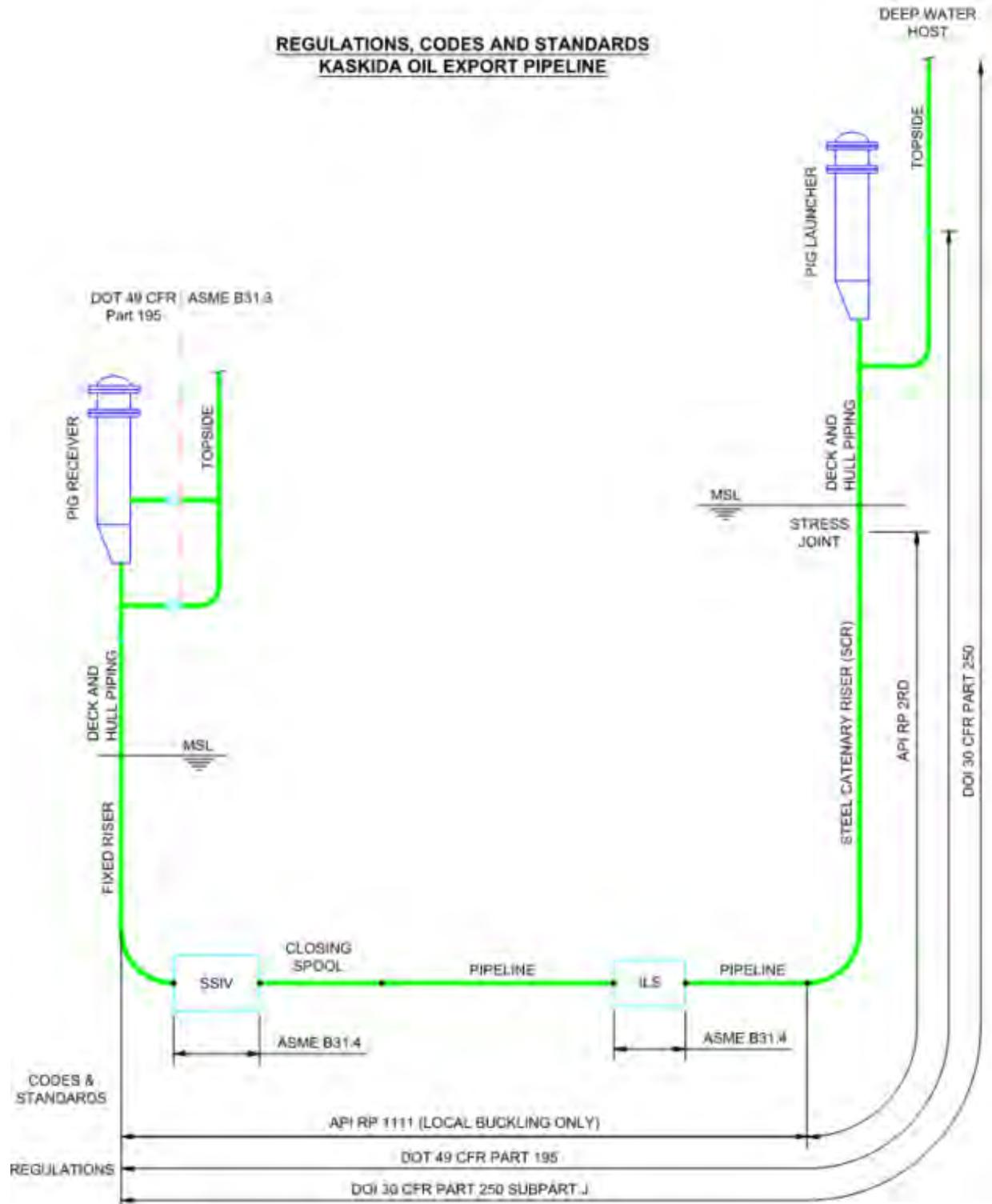


Figure 3 – Regulations, Codes, and Standards for Kaskida Oil Pipeline

COVER SHEET EXECUTIVE SUMMARY

**POINT OF TRANSFER FROM THE PRODUCER**

Export Oil will be measured through a LACT/metering facility on the Kaskida FPU. However, the point of custody transfer between the Producer (BP Kaskida Host) and the Transporter (Enbridge) will be at top of SCR stress joint, as shown on the Kaskida Oil Pipeline Safety Schematic (Drawing KOGE-W.035-2003).

The Kaskida Oil Export Pipeline will be bidirectional to accommodate Oil buy back during commissioning and Kaskida FPU operational requirements.