



Date: August 9, 2024

Rachel Fabian
Response Certification & Planning Unit Supervisor
Preparedness Branch - Office of Spill Prevention and Response
California Department of Fish and Wildlife

Subject: Platform Holly OSCP Plan L1-42-6290

Dear Ms. Fabian,

Beacon West respectfully submits this letter, on behalf of the California State Lands Commission, requesting OSPR to review and analyze the efficacy of the Ellwood Oil Spill Contingency Plan (plan number L1-42-6290). Upon completion of the Platform Holly well plug & abandonment (scheduled completion of this work is September 7, 2024) the platform will be permanently out of service and “cold stacked” pending further decommissioning.

The following provides a description of the facility:

- Platform Holly is permanently shutdown and entirely incapable of oil production or handling. All wells will be permanently plugged and abandoned by September 7, 2024.
- All platform oil production, handling and storage equipment and piping has been flushed and cleaned, opened to atmosphere or permanently isolated. The only remaining oil storage is a 140 gallon diesel fuel tank attached to the fixed platform crane (see enclosed picture).
- The Platform Holly to the Ellwood Onshore Facility (EOF) oil pipeline has been flushed and pigged to remove all residual oil, blinded and/or air-gapped and capped at both ends to permanently remove the pipeline from service.
- The platform will be unmanned with only periodic visits for maintenance and inspection.
- The Ellwood Onshore Facility is permanently shutdown pending decommissioning, and permanently separated from Platform Holly.

Beacon West believes the Holly platform and associated oil pipeline no longer meet the definition of a “Facility” under Title 14 CCR §790 (f)(1) associated with the supply chain of oil and therefore no longer applicable to the Marine Facility Contingency Plan regulations §817.02-03.



Respectfully,

A handwritten signature in blue ink, appearing to read "Keith Wenal". The signature is fluid and cursive, with a large loop at the end.

Keith Wenal
Beacon West Energy Group, LLC.
1145 Eugenia Pl., Suite 101
Carpinteria, CA 93013

Cc: Peter Regan – CA State Lands Commission

Platform Holly Crane Fuel Tank

