

**BEFORE THE ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.**

In re:)
)
)

Shell Gulf of Mexico, Inc.)
Permit No. R10OCS/PSD-AK-09-01)

and)
)

Shell Offshore, Inc.)
Permit No. R10OCS/PSD-AK-2010-01)
)
)

NOTICE OF ERRATA

**NATURAL RESOURCES DEFENSE COUNCIL, NATIVE VILLAGE OF POINT HOPE,
RESISTING ENVIRONMENTAL DESTRUCTION ON INDIGENOUS LANDS
(REDOIL), ALASKA WILDERNESS LEAGUE, AUDUBON ALASKA, CENTER FOR
BIOLOGICAL DIVERSITY, NORTHERN ALASKA ENVIRONMENTAL CENTER,
OCEAN CONSERVANCY, OCEANA, PACIFIC ENVIRONMENT,
and SIERRA CLUB**

Petitioners Natural Resources Defense Council, *et al.*, hereby, submit the attached replacement page 6 of the Petition for Review of Shell Gulf of Mexico, Inc. Permit No. R10OCS/PSD-AK-09-01 and Shell Offshore, Inc. Permit No. R10OCS/PSD-AK-2010-01, filed May 3, 2010. The replacement page is exactly the same as page 6 of the Petition for Review, with the exception of the replacement of “Sierra Club, and World Wildlife Fund are conservation groups” with “and Sierra Club are conservation groups” Petitioners regret the error and apologize for any inconvenience to the Board.

Respectfully submitted this 4th day of May, 2010.

s/ David R. Hobstetter

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CERTIFICATE OF SERVICE

I hereby certify that on May 4, 2010, a copy of foregoing **NOTICE OF ERRATA**, with attachment, in the matter of *In re: Shell Gulf of Mexico, Inc., Permit No. R10OCS/PSD-AK-09-01 and Shell Offshore, Inc., Permit No. R10OCS/PSD-AK-2010-01* were served by U.S First Class Mail on the following persons:

Dennis McLerran, Regional Administrator
U.S. Environmental Protection Agency, Region 10
Regional Administrator's Office
RA-140
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Shell Gulf of Mexico Inc.
Shell Offshore Inc.
3601 C Street, Suite 1000
Anchorage, AK 99503

s/ David R. Hobstetter

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Ex. 6 at 8, 10-12 (same). These controls and limitations on the associated vessel emissions brought the total projected operation emissions down below the standards, but just barely. Ex. 5 at 53 (showing maximum predicted impacts reaching 84 percent of national ambient air quality standards (“NAAQS”) for 24-hour $PM_{2.5}$); Ex. 6 at 14 (showing maximum predicted impacts reaching 83 percent of NAAQS for 24-hour $PM_{2.5}$). Because the Region refused to apply BACT to the associated vessels, it did not require Shell to apply these technological controls that could have led to substantial additional reductions.

THRESHOLD PROCEDURAL REQUIREMENTS

Natural Resources Defense Council, Alaska Wilderness League, Audubon Alaska, Center for Biological Diversity, Northern Alaska Environmental Center, Ocean Conservancy, Oceana, Pacific Environment, and Sierra Club are conservation groups that work to protect the Arctic environment. The Native Village of Point Hope is a federally recognized tribal government located in northwestern Alaska, on the coast of the Chukchi Sea. The village is the oldest continuously inhabited village in all of North America. Village residents are concerned about the effects Shell’s operations will have on local air quality, human health, and subsistence resources. REDOIL is an organization of Arctic residents devoted to empowering Indigenous Peoples to protect health and the environment, and influencing policies that affect Indigenous Peoples on a local, tribal, state, regional, national and international level.

Petitioners satisfy the threshold requirements for filing a petition for review under Part 124, as follows:

1. Petitioners may appeal the permit decisions because Petitioners participated in the public comment periods on the permits by submitting comments and participating in the public comment period. *See* 40 C.F.R. § 124.19(a); Ex. 1, 2, 3, and 4.