

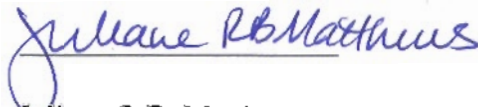
**BEFORE THE ENVIRONMENTAL APPEALS BOARD  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C.**

In re:	)	
	)	
SHELL OFFSHORE, INC.,	)	
Kulluk Drilling Unit	)	Appeal Nos. OCS 08-01 thru OCS 08-03
	)	
OCS Permit No. R10OCS-AK-07-01	)	
(Revised)	)	

**SUBMISSION OF CERTIFIED INDEX TO THE SUPPLEMENT THE  
ADMINISTRATIVE RECORD**

Pursuant to the July 22, 2008 Scheduling Letter of the Environmental Appeals Board in these appeals, EPA Region 10 (Region 10) hereby submits the original Certified Index to the Supplement to the Administrative Record for Region 10's decision to issue the above captioned revised Outer Continental Shelf permit to Shell Offshore Inc. As indicated on the attached certification, the Administrative Record for OCS Permit No. R10OCS-AK-07-01 (Revised) issued June 18, 2008 includes the Administrative Record for OCS Permit No. R10OCS-07-01 issued June 12, 2007. A Certified Index to the Administrative Record for the 2007 permit was submitted to the EAB on July 30, 2007. Subsequently, Region 10 revised the permit and supplemented the record. This Certified Index is for the Supplement to the Administrative Record. A set of two CDs containing an electronic courtesy copy of the Supplement to the Administrative Record is also enclosed.

Dated August 20, 2008



Juliane R.B. Matthews  
Assistant Regional Counsel  
EPA Region 10

## CERTIFICATE OF SERVICE

I hereby certify that the Certified Index to the Supplement to the Administrative Record for Shell Offshore, Inc., OCS Permit No. R10OCS -AK-07-01 (Revised), OCS Appeal Nos. 08-01 through 08-03 was electronically filed with the Environmental Appeals Board and, along with an electronic copy of the Supplement to the Administrative Record, was sent to the following persons in the manner indicated.

Original via Express Mail

U.S. Environmental Protection Agency  
Clerk of the Board  
Environmental Appeals Board  
Colorado Building  
1341 G Street, N.W., Suite 600  
Washington, D.C. 20005

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Date: August 20, 2008

Name: Carol Kennedy

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

In re:	)	
	)	
SHELL OFFSHORE, INC.,	)	
Kulluk Drilling Unit	)	Appeal Nos. OCS 08-01 thru OCS 08-03
	)	
OCS Permit No. R10OCS-AK-07-01	)	
(Revised)	)	

**CERTIFIED INDEX TO THE SUPPLEMENT TO THE ADMINISTRATIVE  
RECORD**

As the Director in the Office of Air, Waste and Toxics for the United States Environmental Protection Agency, Region 10, I hereby certify that the attached index constitutes the Certified Index to the Supplement to the Administrative Record forming the basis for EPA Region 10's decision to issue the above-captioned revised Outer Continental Shelf permit to Shell Offshore, Inc. As indicated on the attached index, the Administrative Record for OCS Permit No. R10OCS-AK-07-01 (Revised) issued June 18, 2008 includes the Administrative Record for OCS Permit No. R10OCS-07-01 issued June 12, 2007. A Certified Index to the Administrative Record for the 2007 permit was submitted to the EAB on July 30, 2007. Subsequently, Region 10 revised the permit and supplemented the record. This Certified Index is for the supplement to the Administrative Record.

August 20<sup>th</sup>, 2008

*Mahbubul Islam*

FOR

Richard Albright, Director  
Office of Air, Waste and Toxics  
Environmental Protection Agency, Region X

**Before the Environmental Appeals Board**  
**Appeal Nos. OCS-08-01, 08-02 and 08-03**  
**Shell Kulluk OCS Permit No. R10OCS-AK-07-01 (Revised)**  
**Index to the Supplement to the Administrative Record**

(The Administrative Record for OCS Permit No. R10OCS-AK-07-01 (Revised) issued June 18, 2008 includes the Administrative Record for OCS Permit No. R10OCS-AK-07-01 issued June 12, 2007.)

**AA: Shell Supplemental Application Material**

EPA Exhibit Number	Date	Document Description
AA-1	01/08/08	Shell Impact Analysis Report w/ Cover Letter
AA-2	01/08/08	Shell Modeling Files (Analysis dated 01/08/08) [CD]
AA-3	01/08/08	Shell Kulluk Emissions Spreadsheet
AA-4	01/14/08	Shell Stack Height Consistency in Impact Analysis Report
AA-5	01/16/08	Shell PM <sub>10</sub> and SO <sub>2</sub> Annual Impacts in Impact Analysis Report

**BB: EPA Notice of Proposed Outer Continental Shelf Air Quality Control Minor Permit**

EPA Exhibit Number	Date	Document Description
BB-1	02/2008	EPA Public Notice of Proposed Outer Continental Shelf (OCS) Air Quality Control Minor Permit, Public Hearing, and Public Comment Period
BB-2	02/2008	EPA Fact Sheet
BB-3	02/20/08	Proposed OCS Air Quality Minor Permit for Shell Kulluk Drilling Unit No. R10OCS-AK-07-01 (revised)
BB-4	02/25/08	EPA Press Release
BB-5	03/2008	Display Ads: Petroleum News, Fairbanks Daily News Miner, Anchorage Daily News, Arctic Sounder, Oil and Gas Journal
BB-6	02/21/08	Public Notice in the Anchorage Daily News
BB-7	02/21/08	Transmittal of Record Materials for Public Display, w/o enclosures
BB-8	02/22/08	Email & Regular Mailing List of Public Notice and Fact Sheet
BB-9	02/20/08	Supplemental Statement of Basis (SSOB) for Proposed OCS Air Quality Minor Permit for Shell Offshore Inc. Kulluk Drilling Unit No. R10OCS-AK-07-01 (revised)
BB-9.1	09/14/07	SSOB Attachment 1: September 14, 2007 Environmental Appeals Board (EAB) Remand Order, OCS Appeal Nos. 07-01 & 07-02.
BB-9.2	01/08/08	SSOB Attachment 2: Shell January 8, 2008 Letter to EPA Region 10 Re: Modified Air Impact Analysis - Shell Kulluk Minor Permit R10OCS-AK-07-01, w/o enclosure
BB-9.3	10/31/07	SSOB Attachment 3: Shell Offshore and Shell Gulf of Mexico Beaufort Sea OCS Lease Holdings. Steve Flippen, MMS.
BB-9.4	03/16/06	SSOB Attachment 4: "Shell Initiates Beaufort Sea Oil

EPA Exhibit Number	Date	Document Description
		Exploration," Offshore Magazine, March 16, 2006
BB-9.5	12/2001	SSOB Attachment 5: Nontechnical Guide to Petroleum Geology, Exploration, Drilling, and Production, 2 <sup>nd</sup> Edition, Norman J. Hyne, Ph.D. PennWell Corporation. 2001, page 240.
BB-9.6	11/13/07	SSOB Attachment 6: Shell 2008 Beaufort Sea Exploration Drilling Program Fact Sheet
BB-9.7	11/15/07	SSOB Attachment 7: Shell November 15, 2007 Letter to EPA Region 10 (Excluding Copies of MMS Leases)
BB-9.8	2006	SSOB Attachment 8: Beaufort Sea Planning Area (Alaska) – Province Summary, 2006 Oil and Gas Assessment
BB-9.9	01/09/07	SSOB Attachment 9: Shell January 2007 Exploration Plan Map entitled, "Open Water Program Activities"
BB-9.10	10/13/06	SSOB Attachment 10: Shell January 2007 Shell Exploration Plan Map entitled, "Sivulliq Prospect, Exploration Well Site Clearance Assessments"
BB-9.11	10/16/07	SSOB Attachment 11: Shell October 16, 2007 Meeting Handouts Distributed to EPA Region 10 and MMS (Excluding Copy of Ambient Impact Analysis Presentation)
BB-9.12	01/18/08	SSOB Attachment 12: EPA Region 10 January 18, 2008 Phone Record of Communication with Shell
BB-9.13	02/06/08	SSOB Attachment 13: Shell February 6, 2008 Letter to EPA Region 10
BB-9.14	02/20/08	SSOB Attachment 14: Alaska OCS Region – Minerals Management Service, Beaufort Sea Exploration Wells
BB-9.15	01/28/08	SSOB Attachment 15: EPA Region 10 January 28, 2008 Phone Record of Communication with MMS
BB-9.16	01/18/08	SSOB Attachment 16: EPA Region 10 Calculation of Distance between Historical Beaufort Sea Drill Site Locations
BB-9.17	04/19/93	SSOB Attachment 17: "ARCO's Cook Inlet, Beaufort Strikes Possible Giants," Oil and Gas Journal, April 19, 1993
BB-9.18	10/1999	SSOB Attachment 18: The Petroleum Industry, A Nontechnical Guide, Charles F. Conway, PennWell Publishing Company. 1999. Page 114-115.
BB-9.19	05/21/98	SSOB Attachment 19: EPA Region 8 May 21, 1998 Letter to Utah Division of Air Quality w/ enclosures (Utility Trailer Manufacturing Company)
BB-9.20	05/19/99	SSOB Attachment 20: EPA Region 4 May 19, 1999 Letter to Mecklenburg County Department of Environmental Protection with Referenced Documents (Williams Energy Ventures, Inc., gasoline bulk terminals)
BB-9.21	11/03/86	SSOB Attachment 21: EPA Region 6 November 3, 1986 Letter to Texas Air Control Board (Valero Transmission Company)
BB-9.22	08/08/96	SSOB Attachment 22: EPA Region 5 August 8, 1996 Letter to Ohio Environmental Protection Agency (Honda of America Manufacturing)

EPA Exhibit Number	Date	Document Description
BB-9.23	01/12/07	SSOB Attachment 23: EPA Office of Air and Radiation January 12, 2007 Memorandum entitled, "Source Determinations for Oil and Gas Industries" (Wehrum Memo)
BB-9.24	02/1993	SSOB Attachment 24: ARCO Kulluk Application (First 34 Pages) and Relevant EPA Region 10 Permit Decisionmaking Materials
BB-9.25	02/07/08	SSOB Attachment 25: Patton Boggs, February 7, 2008 Memorandum to EPA Region 10 SOI Supplemental Submission on Kulluk Drill Site Operation
BB-9.26	02/13/08	SSOB Attachment 26: EPA Region 10 February 13, 2008 Ambient Air Quality Impact Analysis Report
BB-9.27	01/17/08	SSOB Attachment 27: Shell January 17, 2008 Description of Kulluk Thrustmaster HPU Control System
BB-9.28	01/18/08	SSOB Attachment 28: EPA Region 10 January 18, 2008 Tribal Consultation Letters
BB-10	03/23/08	Email to Barrow Cable with Request to Scroll Message
BB-11	01/2008 – 02/2008	Telephone Logs with North Slope Communities, with Call List

**CC: Public Comments and Tribal Consultation on Proposed Outer Continental Shelf Air Quality Control Minor Permit**

EPA Exhibit Number	Date	Document Description
CC-1	03/03/08	North Slope Borough (NSB) Comment on Scheduled Hearings and Request for Teleconferencing
CC-2	03/18/08	EPA Reply to NSB March 3, 2008 Request for Teleconferencing at Hearing
CC-3	03/18/08	NSB Request to Extend the Public Comment Period
CC-4	03/20/08	EPA Denial of NSB's Request for an Extension of the Public Comment Period
CC-5	04/01/08	NSB Comment on Proposed Permit
CC-6	06/06/08	NSB Comment on Shell's May 6, 2008 Submittal
CC-7	04/01/08	Northern Alaska Environmental Center (NAEC) Comment on Proposed Permit
CC-8	06/10/08	NAEC Comment on Shell's May 6, 2008 Submittal
CC-8.1	06/12/08	Notice of Posting: NAEC June 10, 2008 Comment
CC-9	03/27/08	Iñupiat Community of the Arctic Slope (ICAS) Request for an Extension of the Public Comment Period
CC-10	04/01/08	EPA Denial of ICAS Request for an Extension of the Public Comment Period
CC-11	04/01/08	ICAS Comment on Proposed Permit
CC-12	04/03/08	Alaska Eskimo Whaling Commission (AEWC) Comment on Proposed Permit
CC-13	04/01/08	Oceana Comment on Proposed Permit
CC-14	03/27/08	Bill MacClarence Comment on Proposed Permit

EPA Exhibit Number	Date	Document Description
CC-15	04/01/08	Shell Comment on Proposed Permit
CC-16	05/06/08	Shell Comment on Proposed Permit/Additional Technical Information
CC-16.1	05/22/08	Notice of Posting: Shell Additional Information Submitted
CC-17	06/04/08	Shell Letter to EPA Administrator and R10 Regional Administrator Re: Air Permitting in Alaska OCS
CC-18	04/01/08	MMS Comment on Proposed Permit
CC-19	04/01/08	Alaska Oil and Gas Association (AOGA) Comment on Proposed Permit
CC-20	04/01/08	ASRC Energy Comment on Proposed Permit
CC-21	03/2008	Material Presented at North Slope Public Information Meetings and Public Hearings in Barrow, Kaktovik and Nuiqsut
CC-22	03/25/08	Barrow Public Hearing Transcript
CC-23	03/25/08	Barrow Public Information Meeting & Public Hearing ("Public Meetings"): Sign-in Sheets
CC-24	03/26/08	Kaktovik Public Hearing Transcript
CC-25	03/26/08	Kaktovik Public Meetings: Sign-in Sheets
CC-26	03/27/08	Nuiqsut Public Hearing Transcript
CC-27	03/27/08	Nuiqsut Public Meetings: Sign-in Sheets
CC-28	03/25/08 – 03/27/08	Audio Recordings [CD]: Public Information Meetings at Barrow, Kaktovik, and Nuiqsut
CC-29	06/16/08	Government-to-Government Tribal Consultation Memorandum
CC-29.A	07/16/01	Tribal Consultation Attachment A: EPA Region 10 Tribal Consultation Framework, Guiding Principles
CC-29.B	07/16/01	Tribal Consultation Attachment B: EPA Region 10, Office of Air Quality, Consultation and Communication Procedures
CC-29.C	11/09/00, 04/19/06	Tribal Consultation Attachment C: Executive Order 13175 "Consultation and Coordination with Indian Tribal Governments" and "Review of EPA Draft Guidance for Implementing Executive Order 13175"
CC-29.D	06/10/07	Tribal Consultation Attachment D: EPA Region 10, Shell OCS Air Quality Permit, Memorandum to File on Tribal Consultation
CC-29.E	01/18/08	Tribal Consultation Attachment E: EPA Region 10 Letters to North Slope Tribal Entities Offering Government-to-Government Consultation
CC-29.F	01/2008 – 02/2008	Tribal Consultation Attachment F: Logs of Telephone Conversations and Emails with Tribal Representatives prior to Consultation Meetings
CC-29.G	03/25/08, 03/27/08	Tribal Consultation Attachment G: Audio of Tribal Consultation Meetings [CD]
CC-29.H	03/25/08, 03/27/08	Tribal Consultation Attachment H: Fact Sheets and Posters Presented at Tribal Consultation Meetings
CC-29.I	01/2008 – 02/2008	Tribal Consultation Attachment I: January and February 2008 Telephone Logs with North Slope Communities



EPA Exhibit Number	Date	Document Description
CC-29.J	04/01/08	Tribal Consultation Attachment J: Letter from EPA to ICAS denying an Extension of the Public Comment Period

### DD: EPA Final Decision

EPA Exhibit Number	Date	Document Description
DD-1	06/18/08	Final OCS Air Quality Control Minor Permit R10OCS-AK-07-01 (Revised)
DD-2	06/18/08	Response to Public Comments
DD-3	06/18/08	Notice of Final Permit Cover Letter to Shell, w/o enclosures
DD-4	06/18/08	Notice Letter to Interested Parties, w/ distribution lists, w/o enclosures
DD-5	06/18/08	Request to Store Final Permit Documents, w/o enclosures
DD-6	06/19/08	Press Release
DD-7	06/19/08	Email Notice to Interested Parties

### EE: Technical Support Information and Analysis

EPA Exhibit Number	Date	Document Description
EE-1	07/1979	Standards Support and Draft Environmental Impact Statement Volume I: Proposed Standards of Performance for Stationary Internal Combustion Engines
EE-2	11/1987	Final Environmental Impact Statement for Chukchi Sea Oil and Gas Lease Sale 109. Volume I. OCS EIS/EA MMS 87-0110. Environmental Consequences of Alternative 1 – Effect on Air Quality, pp. IV-B-1 to IV-B-7.
EE-3	04/1993	Emission Factor Documentation for AP-42 Section 3.4, Large Stationary Diesel & All Stationary Dual Fuel Engines, w/ Appendices A-C
EE-4	10/1996	Section 3.4 of AP-42
EE-5	07/2000	Full Scale Experience with Kulluk Stationkeeping Operations in Pack Ice
EE-6	No date	Review of Recent Diverter Performance during Well Control Emergencies
EE-7	04/19/02	Drilling Mud Degasser Produced Gas Control System
EE-8	2005	USGS Evaluation of the Stranded Kavik Gas Field, North Slope of Alaska
EE-9	07/25/05	MMS Notice: Shallow Hazards Survey and Evaluation for OCS Exploration and Development Drilling
EE-10	04/2008	Excerpts from Environmental Impact Report for Tranquillon Ridge Project off the coast of Santa Barbara County
EE-11	06/12/08	EPA memorandum, "Volatile Organic Compound Emissions Associated with Shallow Gas Diversions and Drilling Mud Returns" ("VOC Emissions Memo")
EE-11.1	06/12/08	VOC Emissions Memo Attachment 1: Phone Record of May

EPA Exhibit Number	Date	Document Description
		28, 2008 EPA Call to MMS
EE-11.2	06/12/08	VOC Emissions Memo Attachment 2: VOC Emissions Resulting from Blowout
EE-11.3	06/12/08	VOC Emissions Memo Attachment 3: Record of May 30, 2008 EPA Phone Call to Santa Barbara County Air Pollution Control District (SBCAPCD)
EE-11.4	06/12/08	VOC Emissions Memo Attachment 4: May 30, 2008 SBCAPCD Email to EPA, Re: Emissions from Drilling Muds
EE-11.5	06/12/08	VOC Emissions Memo Attachment 5: May 30, 2008 SBCAPCD Email to EPA with Excerpts from Proposed Final Pardon Project Environmental Impact Report
EE-11.6	06/12/08	VOC Emissions Memo Attachment 6: Page C-21 of Appendix C to Final Environmental Impact Report, Tranquillon Ridge Oil and Gas Development Project, Volume II – Appendices
EE-12	06/12/08	EPA Memorandum, “NO <sub>x</sub> Emission Factor for Vladimir Ignatjuk Propulsion Engines and Electric Generator Engines” (“NO <sub>x</sub> Emission Factor-Memo”)
EE-12.1	06/12/08	NO <sub>x</sub> Emission Factor Memo Attachment 1: List of Documents EPA Reviewed
EE-12.2	06/12/08	NO <sub>x</sub> Emission Factor Memo Attachment 2: EPA NO <sub>x</sub> Emissions Calculations
EE-12.3	06/12/08	NO <sub>x</sub> Emission Factor Memo Attachment 3: Figure A-3. Commercial Marine Vessel Emissions and Fuel Consumption Data, February 2000.
EE-13	09/28/82	EPA Memorandum, “Policy on Excess Emissions During Startup, Shutdown, Maintenance, and Malfunctions”
EE-14	09/20/99	EPA Memorandum, “State Implementation Plans: Policy Regarding Excess Emissions During Malfunctions, Startup, and Shutdown”
EE-15	01/28/93	EPA Memorandum “Automatic or Blanket Exemptions for Excess Emissions During Startup and Shutdowns under PSD”
EE-16	11/17/98	EPA Memorandum “Guidance on the Appropriate Injunctive Relief for Violations of Major New Source Review Requirements”
EE-17	10/25/07	EPA Email Re: Shell Drilling Targets
EE-18	06/13/89	EPA Memorandum “Guidance on Limiting Potential to Emit in New Source Permitting”

### FF: Supplemental Air Quality Modeling Information

EPA Exhibit Number	Date	Document Description
FF-1	01/10/08	EPA Modeling Files for Determining Coastline Impacts [CD]
FF-2	02/13/08	EPA Staff Ambient-Air Quality Impact Analysis Report for Shell Minor Permit Application
FF-3	05/12/08	Determining Impact of Increasing Emissions from Vladimir

EPA Exhibit Number	Date	Document Description
		Ignatjuk
FF-4	12/03/07	Shell Impact Analysis Report
FF-5	12/04/07	Shell Backup Appendix Files to Impact Report
FF-6	12/04/07	Shell Modeling Files [CD]
FF-7	12/07/07	Shell Distribution of Emissions Across Drill Vessel with Spreadsheet on Beaufort Sea Air Emissions Time Line
FF-8	12/27/07	Shell Graphic of the Annual NO <sub>x</sub> Impacts from the Kulluk
FF-9	12/28/07	Shell Modeling Files [CD]
FF-10	12/28/07	Shell Revised Kulluk Impact Modeling
FF-11	09/1995	EPA "SCREEN3 Model User's Guide"
FF-12	07/09/93	EPA Memorandum "Proposal for Calculating Plume Rises for Stacks with Horizontal Releases or Rain Cape for Cookson Pigment, Newark, New Jersey"

### GG: Shell Exploration Plan and Oil Discharge Prevention and Contingency Plan

EPA Exhibit Number	Date	Document Description
GG-1	01/2007	Shell Beaufort Sea Exploration Plan (EP)
GG-2	01/2007	Shell Beaufort Sea Oil Discharge Prevention and Contingency Plan (ODPCP)
GG-3	02/2007	Mineral Management Service (MMS) Environmental Assessment of Shell Beaufort Sea EP
GG-4	02/15/07	MMS Approval of Shell Beaufort Sea EP
GG-5	02/15/07	MMS Approval of Shell Beaufort Sea ODPCP
GG-6	04/03/07	Shell Overview of 2007 Beaufort Sea Exploration Season
GG-7	11/09/07	Shell Fact Sheet – 2008 Beaufort Sea Shallow Hazard and Site Clearance Survey Programs

### HH: Shell Application to MMS for Permit to Drill

EPA Exhibit Number	Date	Document Description
HH-1*	11/14/07	Shell Transmittal Letter w/ Enclosures to EPA:
HH-1.A*	11/14/07	07/20/07 Shell Application for Permit to Drill (APD), Flaxman Island 6658 #001, OCS-Y-1805
HH-1.B*	11/14/07	07/20/07 Shell APD, Flaxman Island 6707 #001, OCS-Y-1807
HH-1.C*	11/14/07	07/20/07 Shell APD, Flaxman Island 6708 #001, OCS-Y-1808
HH-1.D*	11/14/07	07/20/07 Shell Supplemental Information for APD, Flaxman Island 6708 #001, OCS-Y-1808
HH-2	11/14/07	Shell Response for Additional Information (RAI) within Alaska Coastal Management Program Consistency Review Process
HH-3	11/21/07	Shell Transmittal Letter to EPA w/ Enclosure to EPA: June 2007 Shell Permit to Work System, MMS Welding and

EPA Exhibit Number	Date	Document Description
		Burning Plan (Part of APD)
HH-4	01/11/08	EPA Request to Shell for Confidential Business Information Claim Substantiation
HH-5	02/04/08	Shell Response to EPA Request for Confidential Business Information Claim Substantiation
pursuant to 40 C.F.R. Part 2, the public copy of the record excludes information claimed by Shell to be confidential business information		

## II: Additional Support Information

EPA Exhibit Number	Date	Document Description
II-1	10/31/07	Agenda, Handouts, Sign-In Sheet and Notes for October 16, 2007 Meeting involving EPA, MMS, and Shell
II-2	10/29/07	EPA Request to Shell for Additional Information
II-3	11/16/07	Shell Response to EPA Request for Additional Information
II-4	01/02/08	Shell Request Permit Changes
II-5	02/14/08	EPA Completeness Determination for Shell Kulluk Supplemental Application Material
II-6	04/19/02	Ventura County Air Pollution Control District Regulations
II-7	09/01/99	Louisiana Department of Environmental Quality, Memorandum on Interpretation of Contiguous for Oil and Gas Production Facilities
II-8	No date	Louisiana Department of Environmental Quality "Interpretation of Continuous for Oil & Gas Production Facilities"
II-9	12/26/96	Oklahoma Department of Environmental Quality, "General Operating Permit: Crude Petroleum & Natural Gas Industry Commonly Asked Questions"
II-10	03/2002	Texas Natural Resource Conservation Commission: Draft "Potential to Emit For Oil and Gas Exploration, Production, and Gathering Industry"
II-11	05/16/06	Arctic Oil & Gas Final General Permit, w/ Attachments
II-12	01/12/07	Shell Letter Re: Notice of Intent (NOI), NPDES General Permit AKG 28-0000, Shell Exploration Drilling Program - Semi Submersible Drill Ship Kulluk
II-13	04/04/07	EPA Letter of Acknowledgement of NOI
II-14	07/19/07	EPA Letter Re: General NPDES Permit AKG-28-003 Arctic Conical Drilling Unit Kulluk, w/o enclosure

## JJ: Correspondence between EPA, Shell, Federal Agencies, and Other Interested Parties

EPA Exhibit Number	Date	Document Description
JJ-1	04/25/07	Shell Stack Testing Protocols
JJ-2	10/25/07	NSB Letter Re: Request for Public Comment on Remanded Permits

EPA Exhibit Number	Date	Document Description
JJ-3	09/24/07	Alaska Wilderness League et al. Request for Public Comment on Remanded Permits
JJ-4	11/14/07	EPA Response to NSB and Alaska Wilderness League et al. Requests for Public Comment
JJ-5	10/26/07	EPA Phone Record: NSB's Request for Public Comment
JJ-6	11/06/07	MMS Response to EAB's Remand of 2007 Permits
JJ-7	11/08/07	MMS Email Re: Well Blowouts
JJ-8	11/08/07	MMS Email Re: Relief Well Drilling in ODPCP
JJ-9	11/08/07	MMS Email Re: Shell Beaufort Sea OCS Lease Expenditures
JJ-10	11/16/07	MMS Email Re: Well Cellars
JJ-11	11/16/07	EPA Phone Record on Status of EPA Response to NSB's Request for Public Comment
JJ-12	01/28/08	EPA Memo to File Re: Hammerhead and Kuvlum Prospects
JJ-13	12/21/07	Emails Re: December 21, 2007 EPA/Shell Conference Call
JJ-14	04/24/08	Public Question about Anticipated Date of EPA Final Decision

### KK: Endangered Species Act

EPA Exhibit Number	Date	Document Description
KK-1	05/2008	Fish and Wildlife Service (FWS) "Polar Bear ( <i>Ursus maritimus</i> )"
KK-2	05/11/08	Observed Polar Bear Locations from Shell January 2007 Exploration Plan
KK-3	01/09/07	72 Federal Register 1064 (January 9, 2007), Proposed Rule to List the Polar Bear ( <i>Ursus maritimus</i> ) as Threatened Throughout Its Range
KK-4	05/15/08	73 Federal Register 28212 (May 15, 2008), Final Rule, Determination of Threatened Status for the Polar Bear ( <i>Ursus maritimus</i> ) Throughout Its Range
KK-5	05/15/08	73 Federal Register 28306 (May 15, 2008), Interim Final Rule, Special Rule for the Polar Bear
KK-6	06/11/08	73 Federal Register 33212 (June 11, 2008), Final Rule, Marine Mammals; Incidental Take During Specified Activities
KK-7	08/02/06	71 Federal Register 43926 (August 2, 2006), Final Rule, Marine Mammals; Incidental Take During Specified Activities
KK-8	05/14/08	FWS Memorandum Re: "Expectations for Consultations on Actions that Would Emit Greenhouse Gases"
KK-9	08/1993	OCS Study, MMS 93-008, "Guidelines for Oil and Gas Operations in Polar Bear Habitats"
KK-10	2007	The Marine Mammal Protection Act of 1972, As Amended 2007
KK-11	06/12/08	EPA Memo to the File re: MMS Consultation for Polar Bear for Shell

**LL: Journal Articles / Reports / News Articles / Text Book Excerpts**

EPA Exhibit Number	Date	Document Description
LL-1	08/15/75	Oil and Gas Journal (OGJ), "Zinc Carbonate can Control H <sub>2</sub> S in Drilling Mud"
LL-2	08/29/83	Oceans, "Proceedings Oceans '83, Volume II: Technical Papers"
LL-3	06/18/84	OGJ, "Canadian System Extends Arctic Drilling Season"
LL-4	10/19/92	OGJ, "Industry Briefs – Exploration"
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