

September 10, 2020

Ms. Yvette M. Fields
Director
Office of Deepwater Port Licensing and Port Conveyance
Maritime Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE, W21-310
Washington, DC 20590Dear

Re:

Revised Harbor Island Scope Clarification
Bluewater SPM Project (MARAD-2019-0094)
Bluewater Texas Terminal LLC
San Patricio, Aransas, and Nueces Counties, Texas

Ms. Fields:

On May 30, 2019 Bluewater Texas Terminal, LLC (BWTT; also referred to as Applicant) submitted an application for a license to own, construct, and operate a deepwater port (DWP) for the export of oil as authorized by the Deepwater Port Act of 1974, as amended. Since the submission of the original Deepwater Port License Application (DWPLA), BWTT has revised the design and layout of the proposed facility located on Harbor Island, in Nueces County, Texas. As such, BWTT is formally requesting that the scope of the proposed Bluewater SPM Project (Project) be revised to reflect the most up-to-date project design. The following provides information regarding the originally submitted design and the revised proposed design with respect to the facility located on Harbor Island.

The original Harbor Island facility occupied an approximate 19-acre area and included two (2) 181,000 bbl crude oil storage tanks and two (2) 181,000 bbl water storage tanks. The tanks served to allow for the flushing of crude oil from the offshore pipeline infrastructure in the event of an emergency or for maintenance purposes. Since submission of the DWPLA, a preferred option has been designed which eliminates the originally proposed four (4) storage tanks and pumps from Harbor Island. The revised design still maintains pipeline flushing capabilities. This will be accomplished through the versatile use of previously-planned crude oil storage tanks and a new water storage tank located at the planned onshore Multi-Use Terminal (MUT). The preferred Harbor Island project design would still consist of a number of originally-proposed infrastructure components, which are required for the operation of the DWP. These facilities include pig launchers/receivers, meters and valves, operations building, and communications facility. The USCG valve (i.e. first on land valve from the proposed DWP) is the same as that proposed in the original design at Harbor Island. The facility located on Harbor Island

would be surrounded by a 10-foot-tall storm surge protection levee including a 20-footwide vehicle access road, as originally proposed.

Based on this design, the facility on Harbor Island would occupy an approximate 12-acre area. This change is a reduction of 7 acres of permanent impacts that had been previously planned and, therefore, minimizes the potential environmental impacts to Harbor Island. The temporary construction workspace located on Harbor Island remains the same as originally proposed to allow the space necessary for the installation of pipeline infrastructure utilizing horizontal directional drill (HDD) installation methods. The 30-inch diameter pipelines entering and exiting the facility located on Harbor Island are proposed to remain the same and be installed using the construction methodology originally proposed.

BWTT is submitting the enclosed information to aid the MARAD in updating documents appropriately to reflect this project scope change. If you have any questions regarding this request or require additional information regarding this request for a project scope change, I can be contacted at (832) 765-1069 or Chaitali.R.Dave@p66.com.

Sincerely,

Chaitali Dave

Chaitali Dave
Senior Project Engineer
Phillips 66 Company