TEXAS GENERAL LAND OFFICE

JERRY PATTERSON, COMMISSIONER

October 4, 2005

Mr. Donald Silawsky
Department of Energy
Office of Petroleum Reserves
1000 Independence Avenue S. W.
Washington, DC 20585-0301

Re: Proposed Expansion of the Strategic Petroleum Reserve (SPR) in Texas

Dear Mr. Silawsky:

Thank you for the opportunity to review the proposed project listed above. The Texas sites under consideration are: (1) Big Hill, Jefferson County, an existing SPR facility to be expanded; and (2) Stratton Ridge, Brazoria County, which is a candidate for a new SPR facility.

The General Land Office (GLO) staff is concerned about potential adverse impacts to Coastal Natural Resource Areas (CNRAs), as defined in 31 TAC §501.3(b). It appears that at least part of the proposed project is in the Coastal Management Program (CMP) boundary. The CMP requires that, if practicable, the project should avoid and/or minimize any adverse impacts to CNRAs in the CMP boundary, as delineated in 31 TAC §503.1. Information on the Texas CMP can be found at the following website: http://www.glo.state.tx.us/coastal/cmp.htm/.

Based on the information provided, it also appears that there may be impacts to coastal wetlands. A wetland delineation may be conducted by the U.S. Army Corps of Engineers (Corps) or a qualified consultant to determine if the wetlands are jurisdictional and a Corps permit is required. Also, a Texas Commission on Environmental Quality (TCEQ) Section 401 water-quality certification may also be needed.

Because part of the proposed project may be on state-owned submerged lands and a GLO coastal lease or easement may be required, I have forwarded the information on the proposed expansion to Mr. Garry McMahan, GLO Asset Inspections in La Porte, Texas at [redacted] or at [redacted]

Also, Mr. Dolan Dunn, Chief, Regulatory Branch, Corps – Galveston District, can be contacted at [redacted] and Mr. Mark Fisher, TCEQ, is at ([redacted].

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Please contact Mr. Thomas Calnan if you have any questions or concerns at [redacted] or [redacted].

Sincerely,

Sam Webb
Deputy Commissioner
Coastal Resources

cc: Louis Renaud, Deputy Commissioner, Energy Resources
Rene Truan, Deputy Commissioner, Asset Inspections