

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION

DONJON-SMIT, LLC,

Plaintiff,

v.

ADMIRAL KARL L. SCHULTZ, CAPTAIN
JOHN W. REED, COMMANDER NORM C.
WITT, and COMMANDER MATTHEW J.
BAER, in their official capacity as officers of
the UNITED STATES COAST GUARD,

Defendants.

No. 2:20-cv-00011 LGW-BWC

**NOTICE OF FILING CORRECTED CERTIFIED INDEX
AND ADDENDUM TO THE ADMINISTRATIVE RECORD**

The Court and counsel will please take notice that undersigned counsel hereby files the attached revised certified index and addendum to the administrative record for purposes of judicial review of the Federal On-Scene Coordinator's December 21, 2019 decision to approve a deviation from the M/V GOLDEN RAY's nontank vessel response plan. The administrative record was previously produced to Plaintiff via the Department of Defense SAFE file sharing service at 4:41 PM on March 3, 2020.

After the expedited production of the record to Plaintiff via the file sharing DoD SAFE platform, counsel for the Coast Guard performed a QA/QC check of the shared files.¹ Upon

¹ As explained to counsel for Plaintiff, in order to produce the documents by the close of business on March 3, 2020, it was not possible to perform the QA/QC check prior to producing the record. Although Plaintiff's counsel has requested extra-record discovery, Dkt. No. 47, Plaintiff has provided no factual basis for challenging the record as incomplete. *See Bar MK*

Cont.

discovering the inadvertent omission of documents that are part of the record (and previously disclosed to the Court and all parties), undersigned counsel immediately notified Plaintiff (on March 4, 2020) and subsequently provided the bates-stamped pages that constitute the administrative record addendum attached hereto (on March 5, 2020).

Date: March 6, 2020

Respectfully submitted,

/s/ Martha C. Mann
MARTHA C. MANN
SYDNEY A. MENEES
U.S. Department of Justice
Environment and Natural Resources Division
Environmental Defense Section
P.O. Box 7611
Washington, D.C. 20044
Telephone: (202) 514-2664 (Mann)
Fax: (202) 514-8865
martha.mann@usdoj.gov
sydney.menees@usdoj.gov

BOBBY L. CHRISTINE
United States Attorney

/s/ Bradford C. Patrick
BRADFORD PATRICK
Assistant United States Attorney
South Carolina Bar No. 102092
Post Office Box 8970
Savannah, Georgia 31412
Telephone: (912) 652-4422
Facsimile: (912) 652-4227
bradford.patrick@usdoj.gov

Counsel for Defendants

Ranches v. Yuetter, 994 F.2d 735, 740 (10th Cir. 1993) (recognizing that the agency's designation of the administrative record is entitled to a presumption of regularity, which can only be rebutted by "clear evidence to the contrary" that the record was not properly designated); accord *Georgia River Network v. U.S. Army Corps of Eng'rs*, No. 4:10-CV-267, 2012 WL 930325, at *5 (S.D. Ga. Mar. 19, 2012), *aff'd*, 517 F. App'x 699 (11th Cir. 2013)

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
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DONJON-SMIT, LLC

Plaintiff,

VERSUS

**ADMIRAL KARL L. SCHULTZ,
CAPTAIN JOHN W. REED,
COMMANDER NORM C. WITT, and
COMMANDER MATTHEW J. BAER, IN
THEIR OFFICIAL CAPACITY AS
OFFICERS OF THE UNITED STATES
COAST GUARD,**

Defendants

2:20-cv-00011 LGW-BWC

DECLARATION OF SHELEE M. CHRISTENSEN

I, Shellee M. Christensen, submit the following declaration pursuant to 28 U.S.C. § 1746, and declare as follows:

1. I am currently serving as the Documentation Unit Leader for the Saint Simons Sound Incident which is the official incident name of the response to the capsizing of the M/V GOLDEN RAY. (I alternate in that capacity with Charles Anglin.) I am a full-time Coast Guard documentation specialist and have served in that capacity for almost seven years. As the Documentation Unit Leader, I am responsible for the maintenance of accurate, up-to-date incident documentation, for organizing all of the incident documentation into the administrative record of the incident, and for the storage and ultimate disposition of the administrative record. This administrative record is required by the National Contingency Plan, 40 C.F.R. § 315.

2. The documents listed in the accompanying amended Index of Administrative Record and filed with the Court are, to the best of my knowledge, a true, correct and complete copy of the administrative record in the above captioned matter challenging a decision by the Federal On-scene Coordinator to grant a deviation from the GOLDEN RAY'S nontank vessel response plan.
3. On March 3, 2020, I executed a prior version of this Index. After further review of that Index, the Coast Guard determined that four documents were inadvertently omitted from the administrative record. Those documents are now included in the administrative record and this Index.

Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and correct.

Dated: March 6, 2020


Shellee M. Christensen

INDEX US COAST GUARD ADMINISTRATIVE RECORD RE HIRING OF COUVILLION FEDERAL ASSUMPTION
MC20 TAYLOR ENERGY SITE (September 24, 2019)

Doc No.	DATE of DOC	NAME OF DOC	BATES RANGE
			USCGREC-
Admin Record			
1	9/16/2019	1. 16SEP19_Hyundai-Glovis_1st_REPLY_to_ADMIN_ORDER	000001-000002
2	9/18/2019	2. 18SEP19_CG_REPLY_to_Acknowledgment_of_ADMIN_ORDER	000003
3	10/8/2019	3. 08OCT19_Hyundai-Glovis_2nd_REPLY_to_ADMIN_ORDER	000004
4	10/15/2019	4. 15OCT19_Hyundai-Glovis_3rd_REPLY_to_ADMIN_ORDER	000005
5	10/29/2019	5. 29OCT19_Hyundai-Glovis_4th_REPLY_to_ADMIN_ORDER	000006
6	11/7/2019	6. 07NOV19_Hyundai-Glovis_5th_REPLY_to_ADMIN_ORDER	000007
7	11/8/2019	7. Amd1_08NOV19_ADMIN_ORDER_01-19_Amendment_1	000008-000009
8	11/12/2019	8. Amd1_12NOV19_Hyundai-Glovis_REPLY_1_to_Amendment_1	000010-000023
9	11/19/2019	9. 19NOV19_Hyundai-Glovis_6th_REPLY_to_ADMIN_ORDER	000024-000025
10	11/22/2019	10. Amd2a_22NOV19_ADMIN_ORDER_01-19_Amendment_2_(See Amd2a Folder Above for Cond 2)	000026-000028
11	11/25/2019	11. Amd2b_25NOV19_Hyundai-Glovis_REPLY_1_Amendment_2_Cond_3_&_4	000029-000048
12	11/26/2019	12. Amd2d_26NOV19_DJS_REPLY_to_Amendment_2_Cond_1_&_2_(See Amd2d Folder Above)	000049-000051
13	12/1/2019	13. Amd2e_01DEC19_FOSC_Reply_to_Amendment_2	000052-000053
14	11/20/2019	14. Amd1_20NOV19_Hyundai-Glovis_REPLY_2_to_Amendment_1	000054-000064
15	12/5/2019	15. Amd2f_05DEC19_Hyundai-Glovis_1st_Request_for_Extension_to_Comply_wAmendment_2	000065-000070
16	12/10/2019	16. Amd2g_10DEC19_FOSC_Reply_Amendment_2_Extension Request	000071
17	12/16/2019	17. (9)_16DEC19_Hyundai-Glovis_7th_REPLY_to_ADMIN_ORDER	000072-000075
18	12/18/2019	18. Amd2h_18DEC19_Hyundai-Glovis_Updated_REPLY_to_Amendment_2_of_ADMIN_ORDER	000076
19	12/20/2019	19. Amd2i_20DEC19_Hyundai-Glovis_2nd_Request_for_Extension_to_Comply_wAmendment_2	000077-000084
20	12/21/2019	20. Deviation_Req_Fm_NTVP USCG_Approval_dtd_21DEC19	000085
21	12/19/2019	21. Deviation_Req_Fm_NTVP_Hyundai-Glovis_dtd_19DEC19	000086-000093
22	9/15/2019	22. (1)_15SEP19_ADMIN_ORDER_01-19_w_Replies_1-7	000094-000108
23	11/25/2019	23. Amd2c_25NOV19_Hyundai-Glovis_REPLY_2_Amendment_2_Cond_1_&_2	000109-000121
24	11/25/2019	24. Amd1_26NOV19_Hyundai-Glovis_REPLY_3_to_Amendment_1_Cond_2	000122-000125
25	12/21/2019	25. FOSC_Decision_Memo_Deviation_Request_21DEC19	000126-000132
26		OMITTED	OMITTED
Amd1_26NOV19_Cond 2 Docs			
27	10/1/2019	27. 10-1-19 GR.SC2A.RF.01 - Risk Forecast - Complete Demolition (2)	000135-000138
28	10/1/2019	28. 10-1-19 GR.SC2A.RF.01 - Risk Forecast - Complete Demolition	000139-000142
29	10/1/2019	29. 10-1-19 GR.SC2B.RF.01 - Risk Forecast - Reduced Parbuckling (2)	000143-000146
30	10/1/2019	30. 10-1-19 GR.SC2B.RF.01 - Risk Forecast - Reduced Parbuckling	000147-000150
31	10/1/2019	31. 10-1-19 GR.SC2.RF.01 - Project Risk Register (2)	000151-000161
32	10/1/2019	32. 10-1-19 GR.SC2.RF.01 - Project Risk Register	000162-000172

INDEX US COAST GUARD ADMINISTRATIVE RECORD RE HIRING OF COUVILLION FEDERAL ASSUMPTION
MC20 TAYLOR ENERGY SITE (September 24, 2019)

Doc No.	DATE of DOC	NAME OF DOC	BATES RANGE
33	10/2/2019	33. 10-2-19 GR.SC1.RF.01 - Risk Forecast - Complete Parbuckling	000173-000175
34	10/2/2019	34. 10-2-19 GR.SC1.RF.01 - Project Risk Register	000176-000184
35	UNK	35. GR.SC2.RF.01 - Baseline Schedule (Gantt) incl risk allocations [A2] (2)	000185
36	UNK	36. GR Barrier alternative hybrid v1.0 (003)	000186-000188
37	UNK	37. GR.SC1.RF.01 - Baseline Schedule (Gantt)	000189
38	10/23/2019	38. 10-23-19 Annex C - scenario 2 large lift VB 10000 - Residual Risk Forecast	000190-000196
39	10/23/2019	39. 10-23-19 Annex C - scenario 2 large lift VB 10000 - Residual Risk Forecast (2)	000197-000203
40	11/3/2019	40. Att 01 20191103 - Golden Ray - Risk Register pCT A4 - Sorted on Risk Areas and Work Packages	000204-000223
41	11/3/2019	41. Att 01 20191103 - Golden Ray - Risk Register pCTHSESQR A3 - Sorted on Risk Areas and Work Packages	000224-000233
42	11/4/2019	42. Att 01 20191104 - Golden Ray - A - Small Section Demolition - Commercial Risk Forecast	000234-000239
43	11/4/2019	43. Att 01 20191104 - Golden Ray - A - Small Section Demolition - Schedule Risk Forecast	000240-000242
44	11/4/2019	44. Att 01 20191104 - Golden Ray - B - Small Section Demolition followed by Large Section lifts - Commercial Risk Forecast	000243-000248
45	11/5/2019	45. 11-5-19 Appendix 7 - 00 GOLDENRAY-SUS192139-MS2121 Wreck Removal Method Statement	000249-000279
46	11/4/2019	46. Att 01 20191104 - Golden Ray - B - Small Section Demolition followed by Large Section lifts - Schedule Risk Forecas	000280-000282
47	11/4/2019	47. Att 02 20191104 - Golden Ray - Scenario A and B - Business Case & Risk Model - PDF in A2 format	000283
48	11/17/2019	48. 11-17-19 Appendix 8 - ITT GOLDEN RAY WR	000284-000299
49	11/20/2019	49. 11-20-19 T8384-001 versie A	000300
50	11/21/2019	50. 11-21-19 R8384-dl1-r3	000301-000392
51	11/23/2019	51. 11-23-19 GR Barrier solution floating dredge hoses v2.2 TOTAL VIEW	000393
52	11/24/2019	52. 20191124 - Voorbij EPB baseline schedule	000394
53	11/24/2019	53. 20191124 - Voorbij EPB failure modes and project risk register	000395-000400
54	11/25/2019	54. 11-25-19 Appendix 1 - 19174-R02B Golden Ray structural stability	000401-000413
55	11/25/2019	55. 20191125 - Golden Ray Scenario 2a - Baseline - Wreck reduction and VB10.000 large section removals (2)	000414
56	11/25/2019	56. 20191125 - Golden Ray Scenario 2a - Baseline - Wreck reduction and VB10.000 large section removals	000415
57	11/26/2019	57. Golden Ray Position Report 26 11 2019 final P&C	000416-000443
Amd2a_22NOV19_Owner & P&I_Docs_Cond 2			
58	9/17/2019	58. 9-17-19 Att 18 Safety Zone	000444
59	10/15/2019	59. 10-15-19 Att 05 GOLDENRAY-SUS192006-CN801 Feasibility study parbuckling & refloat of Golden Ray	000445-000564
60	10/26/2019	60. 10-26-19 Att 19 BMP_26OCT19	000565-000568
61	11/2/2019	61. 11-2-19 Att 06 GOLDENRAY-SUS192139-CN1118 Structural Analysis Hull	000569-000592
62	11/3/2019	62. 11-3-19 Att 03 GOLDENRAY-Org-Chart-Function	000593
63	11/3/2019	63. 11-3-19 Att 04 GOLDENRAY-SUS192139-SP6110 MDR R7	000594-000595
64	11/4/2019	64. 11-4-19 Att 07 GOLDENRAY-SUS192139-CN1119 Wreck monitoring plan	000596-000605
65	11/5/2019	65. 11-5-19 00 GOLDENRAY-SUS192139-MS2121 Wreck Removal Method Statement	000606-000636
66	11/3/2019	66. Att 01 20191103 - Golden Ray - Risk Register pCT A4 - Sorted on Risk Areas and Work Packages	000637-000656

INDEX US COAST GUARD ADMINISTRATIVE RECORD RE HIRING OF COUVILLION FEDERAL ASSUMPTION
MC20 TAYLOR ENERGY SITE (September 24, 2019)

Doc No.	DATE of DOC	NAME OF DOC	BATES RANGE
67	11/4/2019	67. Att 01 20191104 - Golden Ray - A - Small Section Demolition - Commercial Risk Forecast	000657-000662
68	11/4/2019	68. Att 01 20191104 - Golden Ray - A - Small Section Demolition - Schedule Risk Forecast	000663-000665
69	UNK	69. Att 08 GOLDENRAY-SUS192139-D1120 Multibeam comparison	000666-000667
70	UNK	70. Att 09 GOLDENRAY-SUS192139-D1121 Section removal sequence illustration	000668-000669
71	UNK	71. Att 10 GOLDENRAY-SUS192139-D1122 SSD-LSD Decision flowchart	000670
72	UNK	72. Att 11 GOLDENRAY-SUS192006-D302 Steel Sampling Locations Rev B	000671
73	UNK	73. Att 12 GOLDEN RAY-SUS192139-D1314 Worksite layout Rev B	000672
74	UNK	74. Att 13 GOLDEN RAY-SUS192139-D1214 Section cut plan Rev B	000673
75	UNK	75. Att 14 GOLDEN RAY-SUS192139-D1215 Section cut plan for Large D-sections Rev B	000674
76	UNK	76. Att 15 GOLDENRAY-SUS192139-D1815 Cofferdam Layout design	000675
77	UNK	77. Att 16 PPT NINA	000676-000684
78	UNK	78. Att 17 Project SHEQ (1)	000685
79	UNK	79. Att 17 Project SHEQ	000686
80	UNK	80. Att 20 Chesapeake 1000	000687
81	UNK	81. Att 20 Farell 256	000688
82	UNK	82. Att 20 HDW1 Salvage Grab (1)	000689-000690
83	UNK	83. Att 20 HDW1 Salvage Grab	000691-000692
84	UNK	84. Att 20 Taklift 4	000693-000694
85	UNK	85. Att 20 Witte 1411	000695
Amd2d_26NOV19_DJS_Cond 1 & 2 Docs			
86	9/2/2017	86. 9-2-17 G-Marine Service Co Ltd SMFF Contract	000696-000699
87	UNK	87. 10. Eol_Overview of bidders	000700
88	10/16/2019	88. 10-16-19 golden ray loi	000701-000703
89	10/16/2019	89. 10-16-19 NDA DJS-Company	000704-000709
90	10/16/2019	90. 10-16-19 WH#1	000710-000712
91	11/17/2019	91. 11-17-19 ITT GOLDEN RAY WR	000713-000728
92	UNK	92. Response Final Attachments	000729-000735
93	11/2/2019	93. 11-2-19 GOLDEN RAY - Dissenting Report 02-11-2019	000736-000737
94	11/3/2019	94. 11-3-19 Response to MV GOLDEN RAY Dissenting Report (Signed)	000738-000739
95	11/8/2019	95. 11-8-19 WH#4	000740-000742
96	11/26/2019	96. 11-26-19 Response Letter Final	000743-000745
97	UNK	97. GOLDEN RAY_Q&A_ITT_231119	000746-000748
98	UNK	98. GOLDEN RAY Eol	000749-000753
99	11/19/2019	99. Overview of Response as of 11-19-19	000754-000755
100	11/11/2019	100. 19-030 ExecutiveSummary 20191111	000756
101	9/20/2017	101. 9-20-2017 OPA-90_SMFF_Agreement_Att to G-Marine Service Co Ltd SMFF Contract	000757-000760
102	11/23/2019	102. 11-23-19 Fwd FW Call [NOE-LIVE.FID3210670]	000761-000764
103	11/8/2019	103. 11-8-19 Mail - Fwd GOLDEN RAY New Wreckhire and Transitional Agreement - subject to contract	000765-000771
104	11/23/2019	104. 11-23-19 Microsoft Outlook - Memo Style	000772-000778

INDEX US COAST GUARD ADMINISTRATIVE RECORD RE HIRING OF COUVILLION FEDERAL ASSUMPTION
MC20 TAYLOR ENERGY SITE (September 24, 2019)

Doc No.	DATE of DOC	NAME OF DOC	BATES RANGE
105	11/23/2019	105. 11-23-19 Microsoft Outlook - Memo Style 2	000779-000785
106	11/23/2019	106. 11-23-19 Microsoft Outlook - Memo Style 3	000786-000788
107	9/17/2019	107. 9-17-19 Att 18 Safety Zone	000789
108	10/15/2019	108. 10-15-19 Att 05 GOLDENRAY-SUS192006-CN801 Feasibility study parbuckling & refloat of Golden Ray	000790-000909
109	10/26/2019	109. 10-26-19 Att 19 BMP_26OCT19	000910-000913
110	11/2/2019	110. 11-2-19 Att 06 GOLDENRAY-SUS192139-CN1118 Structural Analysis Hull	000914-000937
111	11/3/2019	111. 11-3-19 Att 01 20191103 - Golden Ray - Risk Register pCT A4 - Srted on Risk Area and Wk Pkgs	000938-000957
112	11/3/2019	112. 11-3-19 Att 03 GOLDENRAY-Org-Chart-Function	000958
113	11/3/2019	113. 11-3-19 Att 04 GOLDENRAY-SUS192139-SP6110 MDR R7	000959-000960
114	11/4/2019	114. 11-4-1Att 02 20191104 - Golden Ray - Scenario A and B - Business Case & Risk Model	000961
115	11/4/2019	115. 11-4-19 Att 01 20191104 - Golden Ray - A - Small Section Demolition - Schedule Risk Forecast	000962-000964
116	11/4/2019	116. 11-4-19 Att 07 GOLDENRAY-SUS192139-CN1119 Wreck monitoring plan	000965-000974
117	11/4/2019	117. 11-4-19Att 01 20191104 - Golden Ray - A - Small Section Demolition - Commercial Risk Forecast	000975-000980
118	11/5/2019	118. 11-5-19 00 GOLDENRAY-SUS192139-MS2121 Wreck Removal Method Statement	000981-001011
119	UNK	119. Att 08 GOLDENRAY-SUS192139-D1120 Multibeam comparison	001012-001013
120	UNK	120. Att 09 GOLDENRAY-SUS192139-D1121 Section removal sequence illustration	001014-001015
121	UNK	121. Att 10 GOLDENRAY-SUS192139-D1122 SSD-LSD Decision flowchart	001016
122	UNK	122. Att 11 GOLDENRAY-SUS192006-D302 Steel Sampling Locations Rev B	001017
123	UNK	123. Att 12 GOLDEN RAY-SUS192139-D1314 Worksite layout Rev B	001018
124	UNK	124. Att 13 GOLDEN RAY-SUS192139-D1214 Section cut plan Rev B	001019
125	UNK	125. Att 14 GOLDEN RAY-SUS192139-D1215 Section cut plan for Large D-sections Rev B	001020
126	UNK	126. Att 15 GOLDENRAY-SUS192139-D1815 Cofferdam Layout design	001021
127	UNK	127. Att 16 PPT NINA	001022-001030
128	UNK	128. Att 17 Project SHEQ	001031
129	UNK	129. Att 20 Chesapeake 1000	001032
130	UNK	130. Att 20 Farell 256	001033
131	UNK	131. Att 20 HDW1 Salvage Grab	001034-001035
132	UNK	132. Att 20 Taklift 4	001036-001037
133	UNK	133. Att 20 Witte 1411	001038
134	10/17/2019	134. 10-17-19 . References to Cofferdam in Client Minutes	001039-001051
135	11/18/2019	135. Golden Ray - Comparison EPB Contractor 20191118	001052-001055
136	10/31/2019	136. Golden Ray_Talking points - Oct 31 2019	001056-001064
137	10/31/2019	137. Donjon-SMIT Presentation Format_31 Oct 2019	001065-001085
138	N/A	138. Combined Emails from Salvage	001086-001120
139	11/7/2019	139. 11-7-19 Weeks Marine1	001121-001122
140	11/8/2019	140. 11-8-19 BoMac Origin of materials1	001123-001125
141	11/8/2019	141. 11-8-19 SJ Hamill email1	001126-001128
142	11/10/2019	142. 11-10-19 Voorbij proposal	001129-001130

INDEX US COAST GUARD ADMINISTRATIVE RECORD RE HIRING OF COUVILLION FEDERAL ASSUMPTION
MC20 TAYLOR ENERGY SITE (September 24, 2019)

Doc No.	DATE of DOC	NAME OF DOC	BATES RANGE
143	UNK	143. Golden Ray Sheet piles_Option A	001131
144	UNK	144. Golden Ray Sheet piles_Option B	001132
145	10/22/2019	145. 10-22-19 Temporary Cofferdam - Plans & Elevations - Sheet 1	001133
146	10/31/2019	146. 10-31-19 Project Europe Offerte GvT Golden Ray	001134-001137
147	OMITTED	OMITTED	
148	11/1/2019	148. 11-1-19 BoMac Microsoft Word - Marine Estimate Cover Page Template - 3	001138-001207
149	11/6/2019	149. 11-6-19 SJ Hamill 19-89_REV1 Golden Ray Salvage Containment	001208-001209
150	11/7/2019	150. 11-7-19 Weeks Marine 2749_001	001210-001211
151	11/10/2019	151. 11-10-19 14300.1 Rev 1 Pre Engineered Proposal Coffe at Golden Ray (2)	001212-001319
152	11/10/2019	152. 11-10-19 14300.1 Rev 1 Pre Engineered Proposal Coffe at Golden Ray	001320-001427
153	11/12/2019	153. 11-12-19 Pile driving proposal Golden Ray salvage_Georgia USA_12112019	001428-001430
154	11/14/2019	154. 11-14-19 19-89 Golden Ray Salvage Containment Combi Wall Proposal	001431-001440
155	11/18/2019	155. 11-18-19 14300.4 Updated Prelim Pre Engineered Proposal Option 1 R1	001441-001547
156	11/18/2019	156. 11-18-19 14300.4 Updated Prelim Pre Engineered Proposal Option 2	001548-001654
157	11/6/2019	157. Barnett The Golden Ray - Cofferdam Proposal 11-06-2019	001655-001662
158	UNK	158. SJ Hamill Engineering Microsoft PowerPoint - Summary.pptx	001663-001669
159	UNK	159. SJ Hamill Golden Ray Salvage - Cofferdam Installation Sketch	001670
IAP			
160	N/A	160. Period_01_IAP_10SEP-11SEP2019	001671-001696
161	N/A	161. Period_02_IAP_11SEP-14SEP2019	001697-001737
162	N/A	162. Period_03_IAP_14SEP-16SEP2019	001738-001774
163	N/A	163. Period_04_IAP_16SEP-18SEP2019	001775-001811
164	N/A	164. Period_05_IAP_18SEP-20SEP2019	001812-001851
165	N/A	165. Period_06_IAP_20SEP-23SEP2019	001852-001898
166	N/A	166. Period_07_IAP_23SEP-27SEP2019	001899-001937
167	N/A	167. Period_08_IAP_27SEP-01OCT2019	001938-001975
168	N/A	168. Period_09_IAP_01OCT-07OCT2019	001976-002037
169	N/A	169. Period_10_IAP_07OCT-11OCT2019	002038-002091
170	N/A	170. Period_11_IAP_11OCT-17OCT2019	002092-002149
171	N/A	171. Period_12_IAP_17OCT-22OCT2019	002150-002195
172	N/A	172. Period_13_IAP_22OCT-31OCT2019	002196-002242
173	N/A	173. Period_14_IAP_31OCT-10NOV2019	002243-002305
174	N/A	174. Period_15_IAP_10NOV-21NOV2019	002306-002370
175	N/A	175. Period_16_IAP_21NOV-15DEC2019	002371-002425
176	12/19/2019	176. 19DEC19_Email_tM_V GOLDEN RAY Salvage Plan Review1	002426-002434
177	12/19/2019	177. 19DEC19_Email_Salvage Plan for Review	002435-002545
178	12/19/2019	178. 19DEC19_Email_tM_V GOLDEN RAY Salvage Plan Review	002546-002556
179	12/19/2019	179. 19DEC20_Email_M_V GOLDEN RAY Salvage Plan Review	002557

INDEX US COAST GUARD ADMINISTRATIVE RECORD RE HIRING OF COUVILLION FEDERAL ASSUMPTION
MC20 TAYLOR ENERGY SITE (September 24, 2019)

Doc No.	DATE of DOC	NAME OF DOC	BATES RANGE
180	11/20/2019	180. 20NOV19_Email_Request for additional information [NOE-LIVE.FID3178814]	002558-002562
181	12/21/2019	181. 21DEC19_Email_FW_ SSSI Deviation Request	002563-002564
182	12/19/2019	182. 19DEC19_Email_MV GOLDEN RAY WRECK REMOVAL	002565-002567
191	NA	N191 Period_17_IAP_15DEC2019-30JAN2020	002727-002782
NTVRP_NonTank Vsl Response Plan			
183	1/25/2016	183. 1-25-16 NTVRP - AIV_V (Office Only)	002568-002591
184	5/6/2016	184. 5-6-19 NTVRP - AI (COTP Zones)	002592-002632
185	9/20/2017	185. 9-20-17 NTVRP-G-Marine SMFF Contract	002633-002636
186	11/12/2013	186. 11-12-13 NTVRP-G-Marine SMFF Written Consent	002637
187	12/29/2017	187. 12-29-17 NTVRP - All - Golden Ray	002638-002643
188	UNK	188. NTVRP-G-Marine SMFF Agreement	002644-002698
189	UNK	189. NTVRP-G-Marine SMFF Schedule A	002699-002702
190	5/6/2019	190. 5-6-19 NTVRP - AI (COTP Zones)	002703-002726

DJS
Class Meeting #1
16/12/2019
Sharon

Risk Forecast

Milestone

Residual risk exposure

MS.03.LS - Phase 3 completed - Wreck removed to seabed (27-Jul-2020)

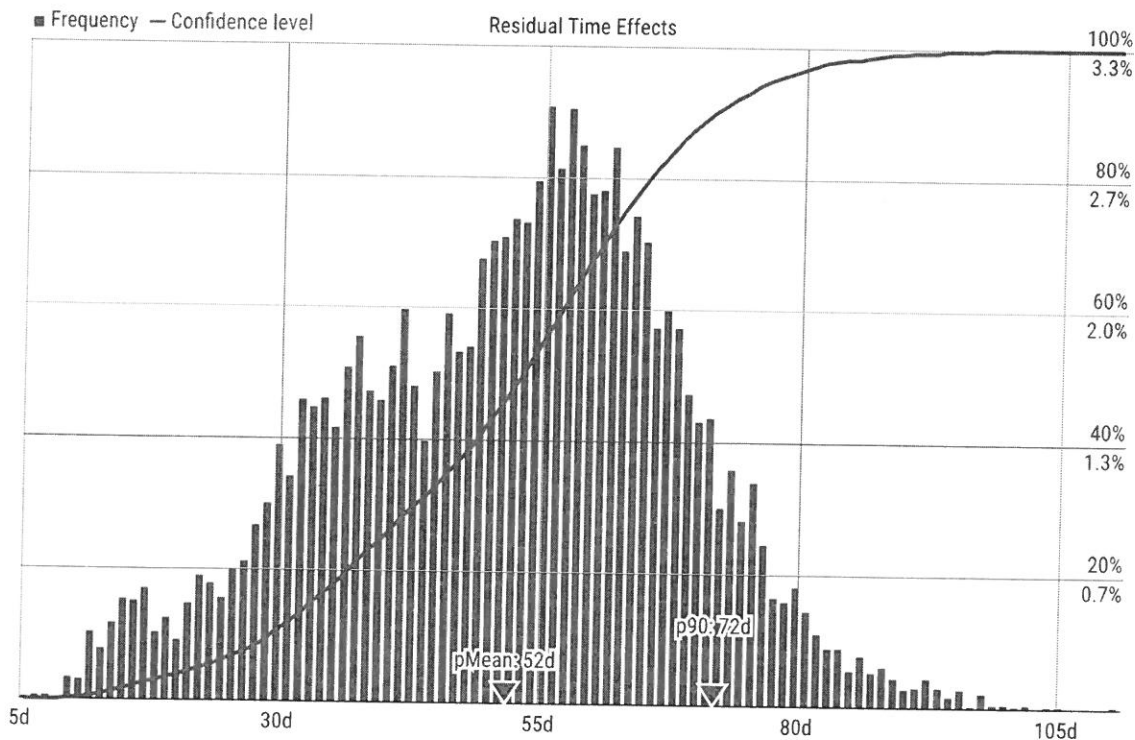
Project Golden Ray - [A] Small Section Demolition and go no go for [B] Large Sections

Scenario GR.DJ.RF.03.01 (Dec 2019)

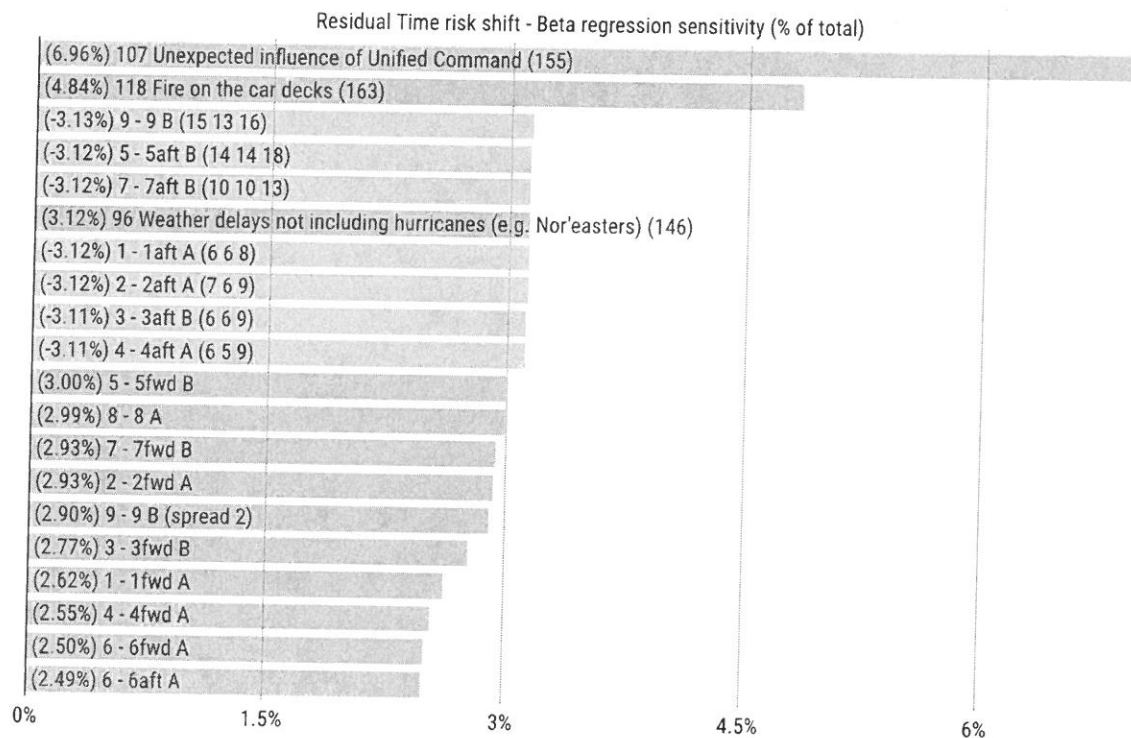
Milestone realisation Forecast - Summary statistics of Residual risk exposure

BEFORE FORECAST	Finish Date			Direct Cost	Indir. Cost	Project Cost
Base Case	27-JUL-'20			N/A	N/A	N/A
AFTER FORECAST	Forecasted Date	Tot. Cost Shift	Liq. Damages Shift	Direct Cost Shift	Indir. Cost Shift	Tot. Project Cost
Expected Mean Value	17-SEP-'20	N/A	N/A	N/A	N/A	N/A
Confidence Levels						
5%-Certainty of no exceeding	19-AUG-'20	N/A	N/A	N/A	N/A	N/A
10%-Certainty of no exceeding	26-AUG-'20	N/A	N/A	N/A	N/A	N/A
20%-Certainty of no exceeding	2-SEP-'20	N/A	N/A	N/A	N/A	N/A
30%-Certainty of no exceeding	8-SEP-'20	N/A	N/A	N/A	N/A	N/A
40%-Certainty of no exceeding	14-SEP-'20	N/A	N/A	N/A	N/A	N/A
50%-Certainty of no exceeding	19-SEP-'20	N/A	N/A	N/A	N/A	N/A
60%-Certainty of no exceeding	23-SEP-'20	N/A	N/A	N/A	N/A	N/A
70%-Certainty of no exceeding	27-SEP-'20	N/A	N/A	N/A	N/A	N/A
80%-Certainty of no exceeding	1-OCT-'20	N/A	N/A	N/A	N/A	N/A
90%-Certainty of no exceeding	7-OCT-'20	N/A	N/A	N/A	N/A	N/A
95%-Certainty of no exceeding	12-OCT-'20	N/A	N/A	N/A	N/A	N/A
99.9%-Certainty of no exceeding	17-NOV-'20	N/A	N/A	N/A	N/A	N/A
RUR, Relative Uncertainty Ratio	16.16%	N/A				

Time risk shift distribution and S-curve

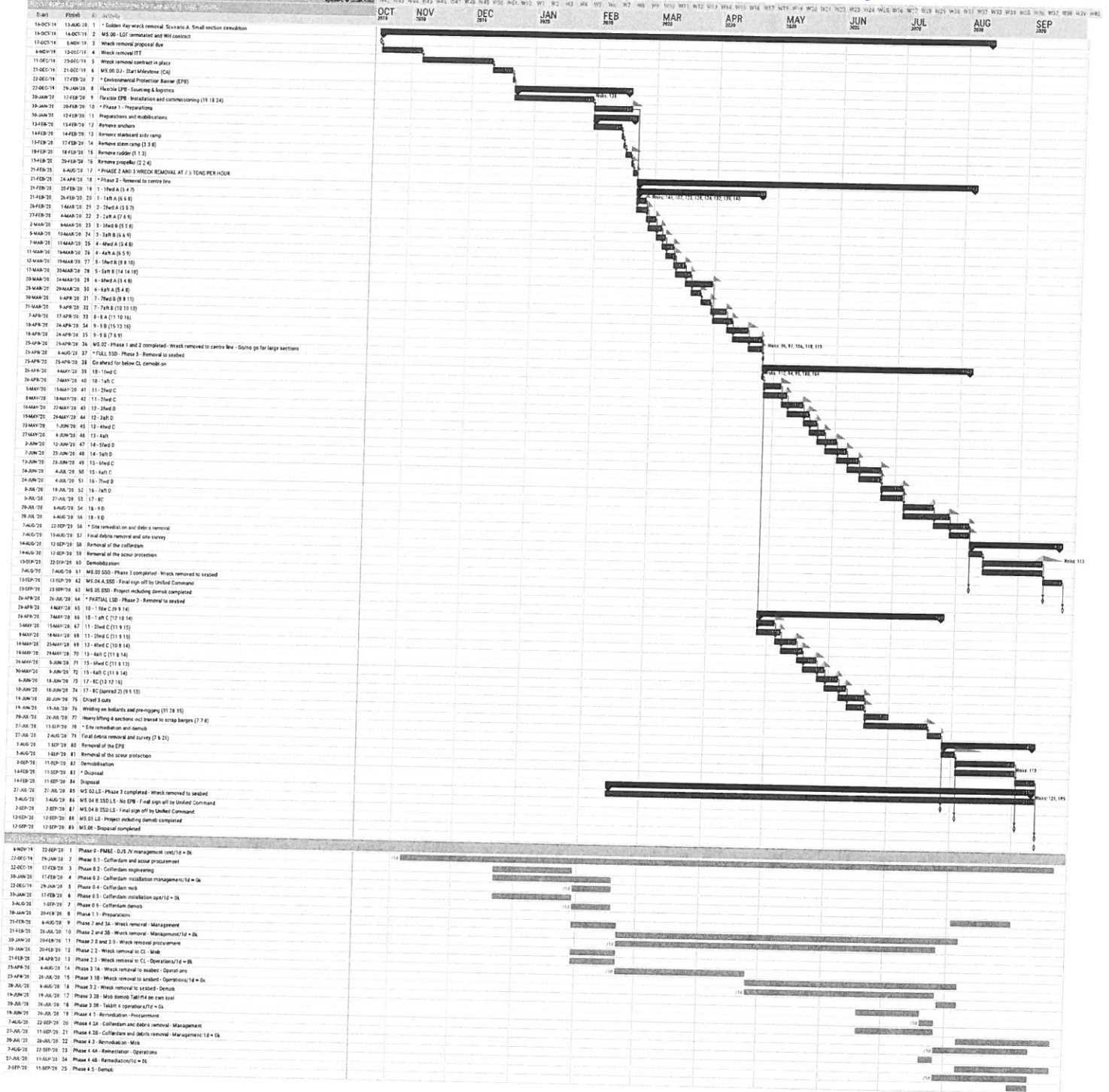


Time sensitivities



Comparison of initial and residual Time risk shift exposure

(Run both Initial and Residual forecast to obtain a Comparison Graph)



T T S
Clarif Meeting # 2 on 15/12/2019
S shown not yet shown.



Risk Forecast

Milestone

Residual risk exposure

MS.03.TT - Wreck removed (13-May-2020)

Project T&T - MV Golden Ray Wreck Removal

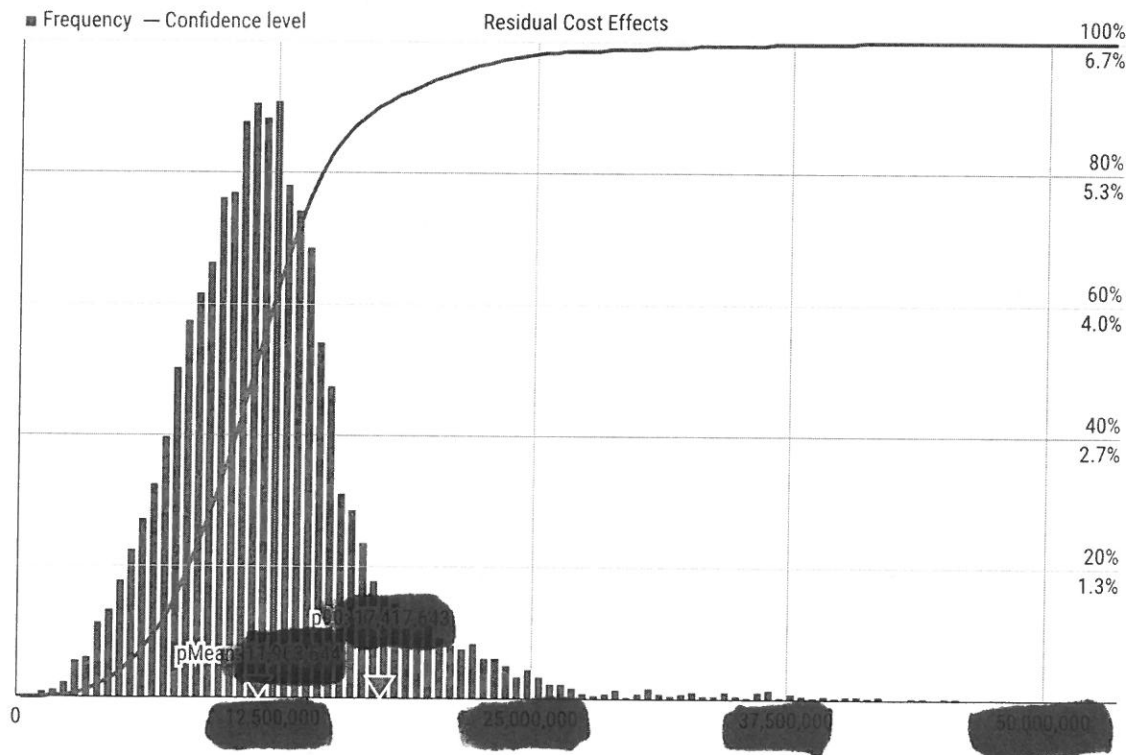
Scenario GR.TT.RF.01.02 (Dec-19)

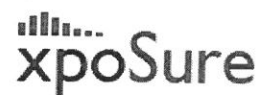


Milestone realisation Forecast - Summary statistics of Residual risk exposure

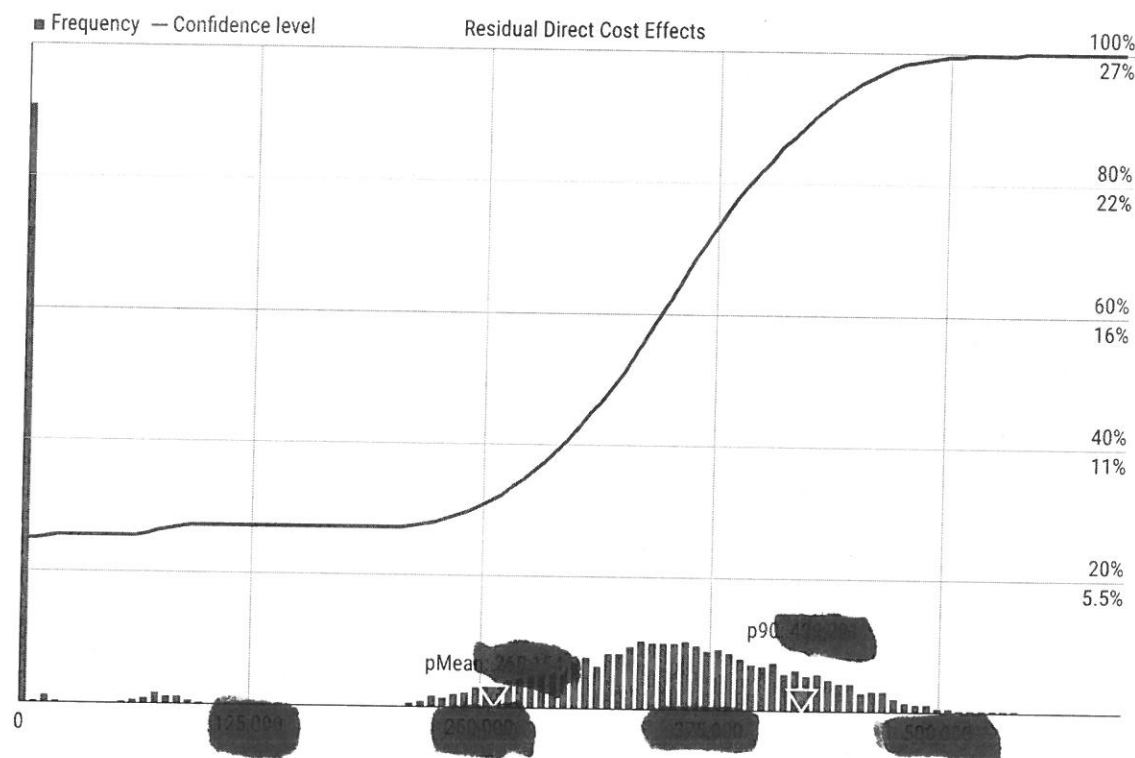
BEFORE FORECAST	Finish Date			Direct Cost	Indir. Cost	Project Cost
Base Case	12-MAY-'20			61,000,003	106,851,978	167,861,981
AFTER FORECAST	Forecasted Date	Dir. Cost Shift	Liq. Damages Shift	Direct Cost Shift	Indir. Cost Shift	Tot. Project Cost
Expected Mean Value	30-MAY-'20	11,063,115	18	260,155	11,703,173	179,125,626
Confidence Levels						
5%-Certainty of no exceeding	23-MAY-'20	5,310,275	10		5,061,235	173,172,256
10%-Certainty of no exceeding	24-MAY-'20	6,006,024	12		6,429,705	174,548,805
20%-Certainty of no exceeding	26-MAY-'20	8,289,467	14		8,034,789	176,141,418
30%-Certainty of no exceeding	27-MAY-'20	9,507,717	15	244,260	9,233,368	177,619,593
40%-Certainty of no exceeding	28-MAY-'20	10,536,705	16	293,792	10,287,677	178,388,149
50%-Certainty of no exceeding	29-MAY-'20	11,447,512	17	323,654	11,195,894	179,309,499
60%-Certainty of no exceeding	30-MAY-'20	12,349,565	18	346,618	12,082,425	180,211,546
70%-Certainty of no exceeding	1-JUN-'20	13,379,517	19	368,450	13,118,593	181,341,498
80%-Certainty of no exceeding	2-JUN-'20	14,674,599	21	394,341	14,405,043	182,536,580
90%-Certainty of no exceeding	6-JUN-'20	17,117,644	24	423,922	17,130,801	185,279,628
95%-Certainty of no exceeding	10-JUN-'20	20,843,111	28	451,815	20,548,635	188,705,092
99.9%-Certainty of no exceeding	15-JUL-'20	54,191,957	64	605,249	54,194,693	222,056,938
RUR, Relative Uncertainty Ratio	11.07%	8.64%				

Cost risk shift distribution and S-curve





Direct Cost risk shift contribution



Direct Cost sensitivities

Residual Direct Cost risk shift - Beta regression sensitivity (% of total)

(78.65%)	24	Treating and disposing contaminated internal waters
(9.15%)	7	Fire on the car decks during wreck removal.
(3.84%)	16	Damage to the Environmental Protection Barrier during wreck removal execution
(3.64%)	21	Actual productivity for demolition of (weaker) wreck sections falls below expected prod...
(2.12%)	19	Reduced workability for divers
(1.12%)	25	Sediment ingress appears to be contaminated
(0.95%)	1	Delayed acceptance of wreck removal plan by competent authorities.
(0.41%)	10	Interference from local stakeholders due to environmental concerns.
(-0.12%)	28	Variations in scrap price rates

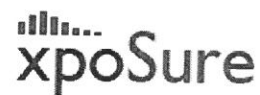
0%

17.5%

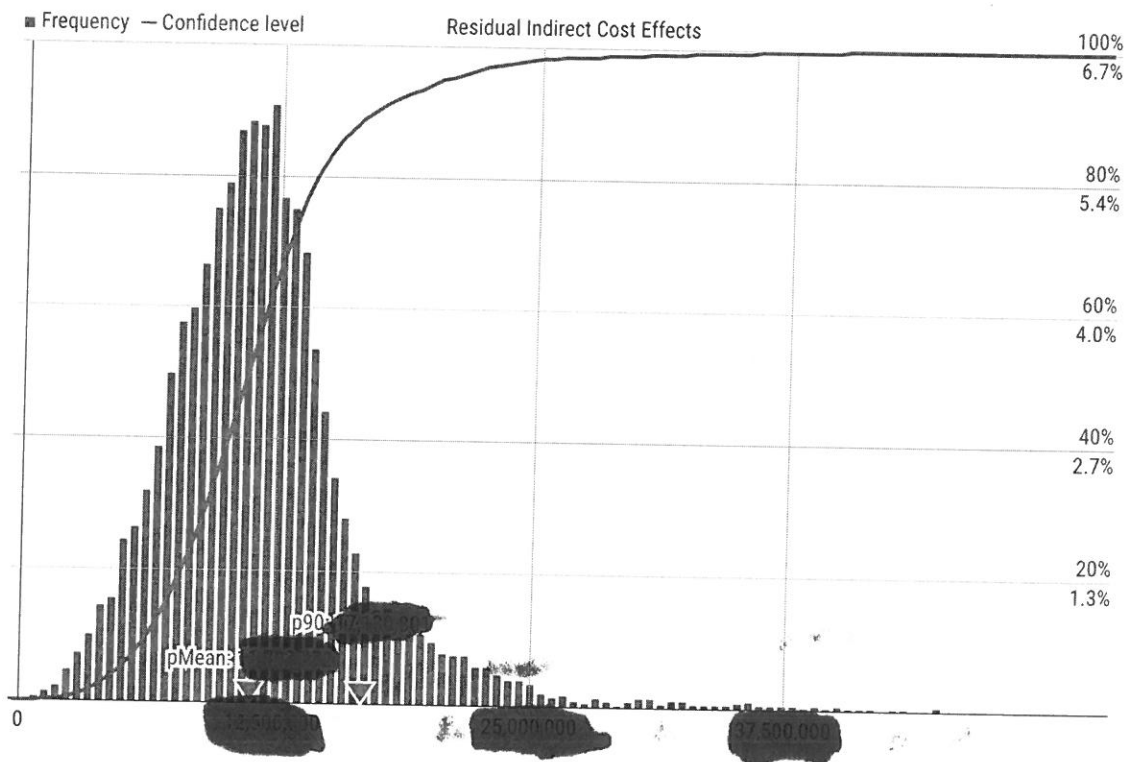
35%

52.5%

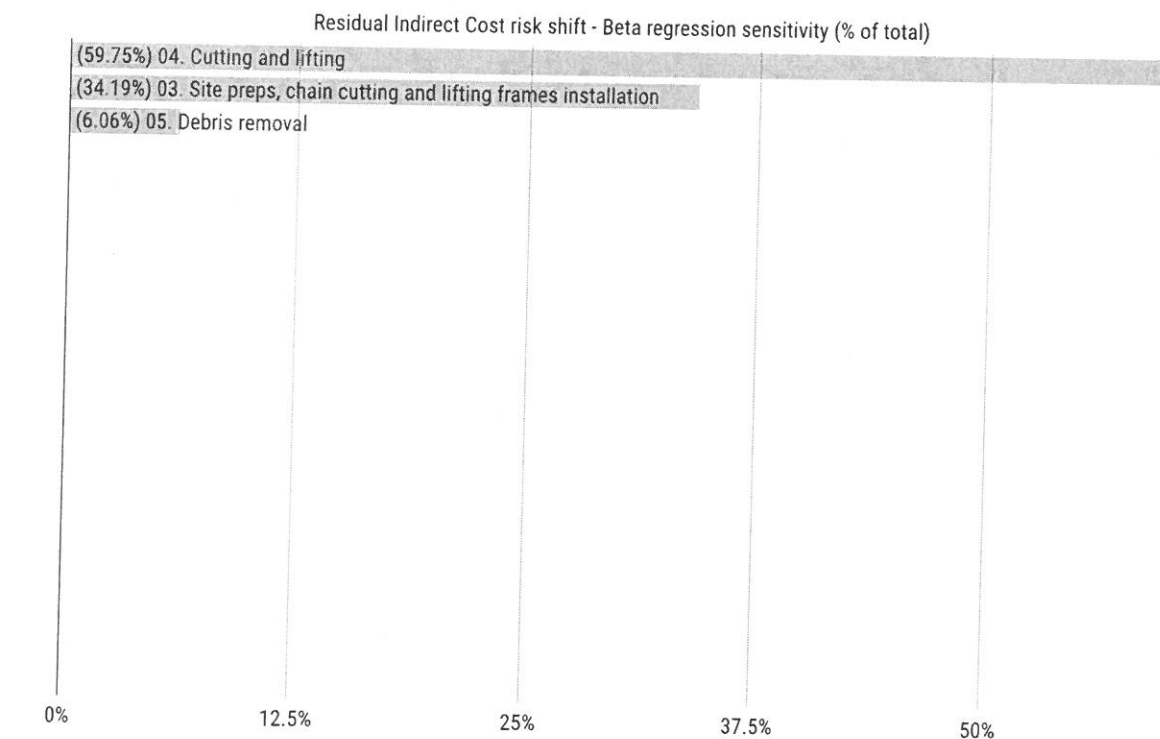
70%



Indirect Cost risk shift contribution

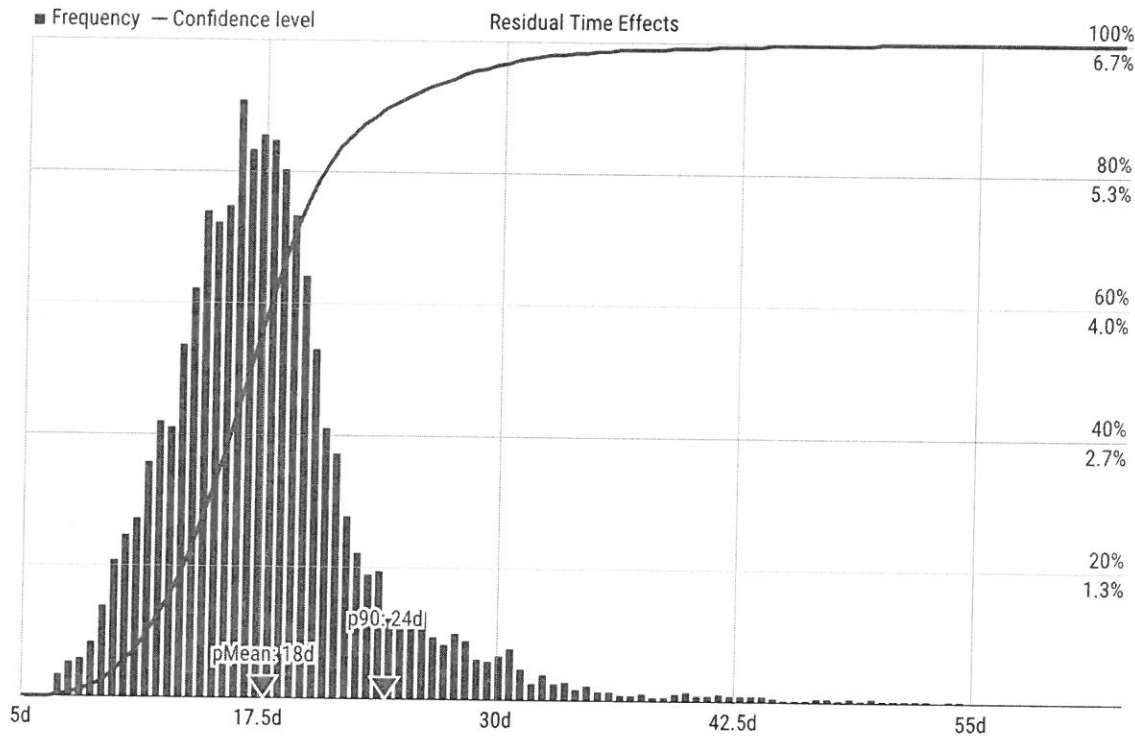


Indirect Cost sensitivities

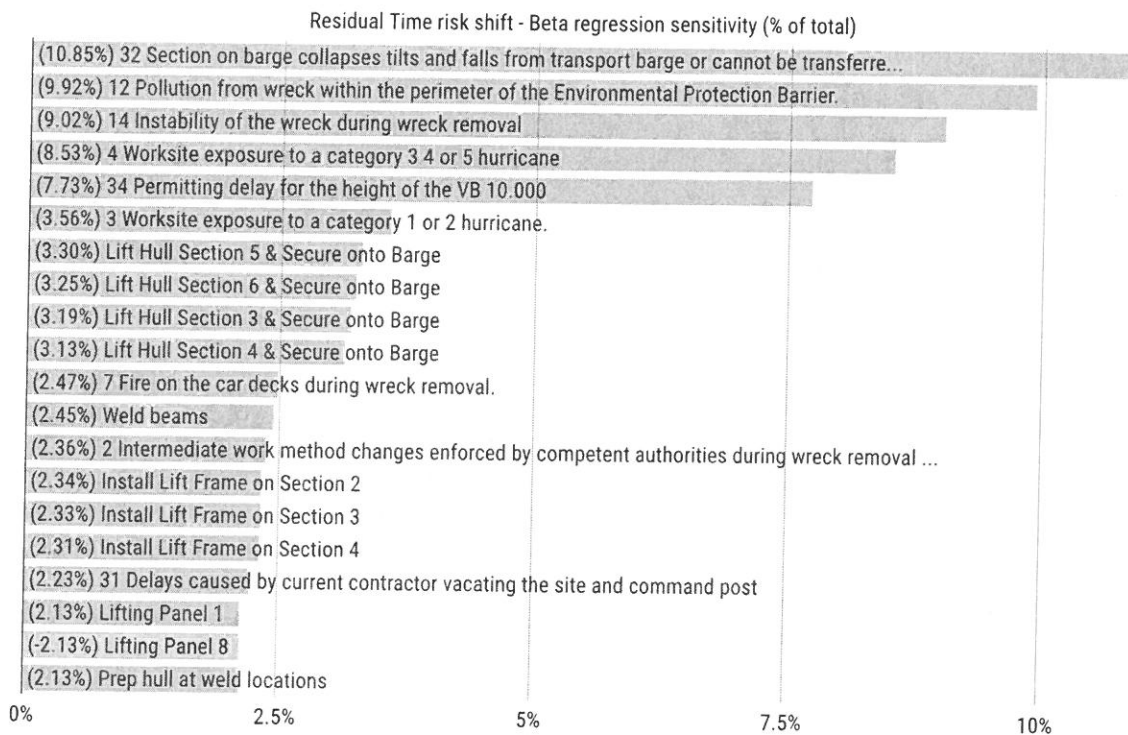


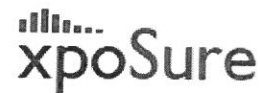


Time risk shift distribution and S-curve

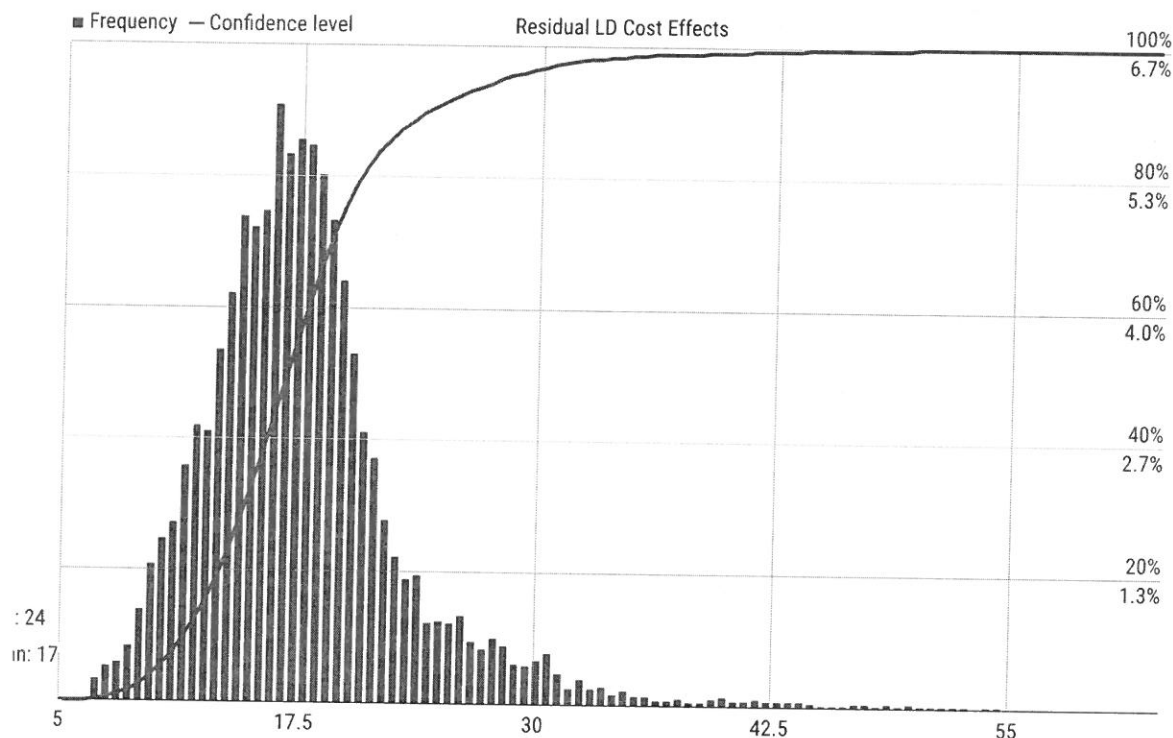


Time sensitivities

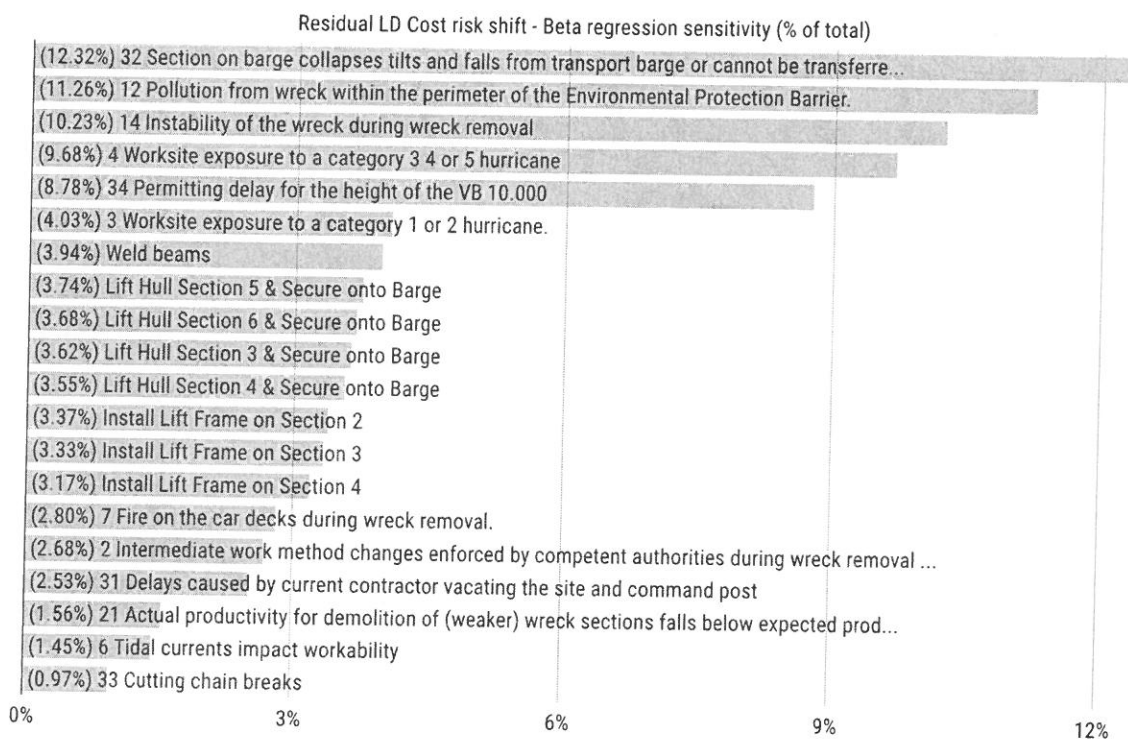


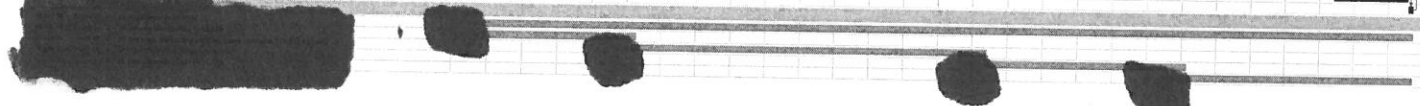


Liquidated Damages Cost risk shift contribution



Liquidated Damages Sensitivities





From: [Lawrence, Andrew R CIV](#)
To: [Witt, Norm C CDR](#)
Cc: [Duty, Sert SMB](#); [Kelly, Scott J CAPT](#); [Baer, Matthew J CDR](#); [Reed, John W CAPT](#); [Young, Jay A CAPT USN COMNAVSEASYSCOM DC \(USA\)](#); [Cost, Daniel H CDR](#); [Peterson, Sean M LCDR](#); [Beck, Kevin M CDR](#)
Subject: SERT Response - M/V GOLDEN RAY wreck removal plan
Date: Tuesday, December 3, 2019 2:41:11 PM

CDR Witt,

Please find SERT's comments below.

We met with SUPSALV yesterday and generally agreed regarding these technical comments. SUPSALV has additional comments that they will be providing separately.

Please let me know if you have any questions. As we discussed on the phone a few weeks ago, I'll be the SERT/Marine Safety Center project manager from this point forward.

Best regards,

Andy

--

Andy Lawrence, P.E.

Salvage Engineering Response Team (SERT)

USCG Marine Safety Center

(202)327-3986 (mobile)

(202)795-6783 (office)

M/V GOLDEN RAY (IMO 9775816)

656' Vehicle Carrier

Information Provided to Us:

SERT was provided with the following documents:

- (a) Donjon-SMIT Document No. GOLDENRAY-SUS192139-MS2121, Rev. 0, "Wreck Removal Method Statement," 31 pages, dated November 5, 2019
- (b) Donjon-SMIT Document No. GOLDENRAY-SUS192139-CN1118, Rev. 0, "Structural

Analysis Hull,” 24 pages, dated November 2, 2019

(c) Global Salvage Consultancy Document, “Position Report 26-11-2019,” 28 pages, dated November 26, 2019

(d) Vuyk Engineering Rotterdam Document No. 19174-R02, Rev. B, “Structural Stability GOLDEN RAY Global Marine Solutions,” 13 pages, dated November 25, 2019

Expectations:

SERT was asked to review the attached documents and provide feedback on the feasibility of the proposed wreck removal plan.

Detailed SERT Response:

Overall, SERT finds the wreck removal method proposed by Donjon-SMIT to be conceptually feasible. However, limited technical detail is provided and significant additional analysis should be expected of any plan before moving forward. We have the following comments regarding technical feasibility:

(1) The wreck removal methodology outlined in reference (a) above indicates that installing a cofferdam around the wreck is optional. However, no discussion of debris containment is included if the cofferdam is not installed. Details on debris and spill containment should be included with or without the cofferdam installed.

(2) The structural analysis in reference (b) has several technical flaws and lacks accuracy when compared to actual observations of the wreck. SERT recommends further analysis be conducted prior to demolition. Prior to removal of structure, we recommend analyzing the flow of stresses to ensure safety of personnel, especially if torch cutting is used. Our major concerns include:

a. Simple beam theory may not accurately capture the global stresses. This theory assumes the body remains rigid, which may not be true for the vertical orientation of the decks. Additionally, simple beam theory assumes that the deflections are orthogonal to a “neutral axis” which may not be true as indicated by the deflection data.

b. The stress calculations are not accurate as noted on page 12 of reference (b) which shows stresses 2.5 times yielding. It is not clear where the maximum stress is predicted within the section at frame 144 or how this calculation accounts for buckled decks.

c. The global model is not used to inform the local finite element model. The global modal indicates concerning levels of stress but this is neglected within the finite element analysis as noted on page 13 of reference (b). It is not clear how the relatively small section finite element model receives input regarding global stresses and what impact this may have during

demolition.

d. As indicated on page 14 of reference (b), the finite element model does not match the actual observation, but this conflict does not appear to be properly addressed.

e. The buckling of the uppermost port side decks is a major structural concern as indicated by progressive listing to the port side over time. This transverse structural stability is not addressed by reference (b) despite a cutting sequence that would remove transverse structure at the bow and stern as a first step.

(3) The report in reference (d) does not present any additional technical information, however, we concur with the conclusion that the structure will continue to degrade at a slow pace.

(4) The alternative wreck removal concepts presented on behalf of the owners and their P&I Club (reference (c)) are also potentially feasible. However, no technical information was included for SERT to review.

SERT is standing by to provide further assistance.

If you have any questions, please contact the Andy Lawrence, SERT Advisor at (202) 327-3986 or andrew.r.lawrence@uscg.mil

Briggs, Salomee G LCDR

From: Beck, Kevin M CDR
Sent: Thursday, December 19, 2019 6:26 PM
To: Briggs, Salomee G LCDR
Subject: FW: M/V GOLDEN RAY Salvage Plan Review

From: Duty, Sert SMB <Sert.Duty@uscg.mil>
Date: Thursday, Dec 19, 2019, 6:21 PM
To: Beck, Kevin M CDR <Kevin.M.Beck@uscg.mil>, Baer, Matthew J CDR <Matthew.J.Baer@uscg.mil>, Witt, Norm C CDR <Norm.C.Witt@uscg.mil>
Cc: Duty, Sert SMB <Sert.Duty@uscg.mil>, Lawrence, Andrew R CIV <Andrew.R.Lawrence@uscg.mil>, 'vincent.jarecki@navy.mil' <vincent.jarecki@navy.mil>
Subject: M/V GOLDEN RAY Salvage Plan Review

Good evening CDR Beck,

Our comments on the M/V GOLDEN RAY wreck removal plan are provided below. Please let us know if you have any questions or additional concerns.

Very Respectfully,

LT Scott Arbeiter
Marine Safety Center
Salvage Engineering Response Team (SERT)
24x7 Mobile: (202) 327-3985
Sert.Duty@uscg.mil

M/V GOLDEN RAY (IMO 9775816)
656' Vehicle Carrier

Information Provided to Us:

SERT was provided T&T Salvage's Preliminary Wreck Removal Plan - MV Golden Ray, as well as the associated appendices as referenced in the plan.

Expectations:

SERT was asked to review the attached documents and provide feedback on the feasibility of the proposed wreck removal plan.

Detailed SERT Response:

Overall, SERT finds the preliminary wreck removal plan proposed by T&T to be technically feasible. Although limited technical detail is provided, the plan indicates further analysis will be conducted prior to operations. We recommend that the FOSC require detailed step-by-step wreck removal plans and analysis for each phase (rigging components, sea fastenings, receiving barge structure/stability, tow transit, and waterway impacts). SERT has the following comments:

- (1) The wreck removal plan references installation of an environmental protection barrier with limited technical detail. The details of this barrier will be critical to environmental protection as well as ensuring sufficient clearance around the wreck and the ability to safely operate VB10,000 during lifting. Plans for the protection barrier and lifting should be further developed to address future heel angle increases of GOLDEN RAY as well as tolerance for lifting operations.
- (2) The structural analysis does not include an analysis of the structure in the current condition, nor does it include an analysis of remaining sections throughout cutting and removal; this should be addressed in future revisions of the wreck removal plan.

SERT is standing by to provide further assistance.

If you have any questions, please contact the SERT duty officer at (202) 327-3985 or Sert.Duty@uscg.mil.