



Comments and Requests for Additional Information

Regarding

Hilcorp Alaska

Cook Inlet Area Production Facilities

Oil Discharge Prevention and Contingency Plan Amendment

Submitted

By

COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL

JANUARY 4, 2013

General Comments

The Hilcorp Alaska (HAK) Cook Inlet Area Production Operations Oil Discharge Prevention and Contingency Plan (ODPCP or C-plan) Amendment was well-written, thorough and provided useful information for use in spill response planning activities. The organizational charts and the diagrams were very detailed, specific and provide excellent information to responders.

There are several references throughout the C-Plan that are unclear. These references point to missing or inaccurate information, which should be clarified prior to approval to ensure their effectiveness and accuracy. Additionally, the appendices noted in the C-Plan were not included and were not available for review.

Overall, many of the concerns raised in this RFAI would be clarified during an exercise or drill, ensuring that responders and the plan holder obtained the necessary information, knowledge and equipment for an actual oil spill response. Cook Inlet RCAC recommends thoroughly testing the procedures outlined in this plan and cross-referencing them with established references and regulations to ensure accuracy and consistency.

Introduction

1.0 Response Action Plan

1.2 Reporting and Notification

1.2.1 Internal Notification Procedures

This section states that ICS will be used for significant spills. ICS, by its nature and design, is expandable and collapsible and even a very simple ICS could be implemented for a small spill response (1-2 people).

RFAI: Please clarify the criteria used to classify or determine when ICS will be implemented.

Table 1-3 Spill Matrix

Table 1-3 indicates that the NRC notification form is completed by telephone. The NRC form may also be completed online and may also be used for spill drill activity.

RFAI: Cook Inlet RCAC recommends that the web address for the online notification tool should be included in Table 1-3 (also listed in Section 1.2.4 – Written Reporting Requirements). Additionally, we recommend spelling out National Response Center the first time it appears in the C-Plan to avoid confusion.

ADEC reporting: there are differences between the reporting guidelines for spill size listed in Table 1-3 and the ADEC website.

RFAI: Please clarify the differences in ADEC reporting guidelines listed in Table 1-3. Cook Inlet RCAC recommends making them consistent with the guidelines listed on the ADEC website.

The notes listed at the end of Table 1-3 do not clarify which agency they refer to – they are not notated in the table itself.

RFAI: Please clarify which agency the notes refer to in the table.

1.3 Safety

1.3.1 General Procedures

This section references both 29 CFR 1910.120 and the CTM for the criteria and development of a site safety plan. Appendix C in the CTM also contains valuable information for the development of a site safety plan. This section does not include a reference to CTM Appendix C.

RFAI: Cook Inlet RCAC recommends including a reference to CTM Appendix C in Section 1.3.1 for ease of reference.

1.6 Response Scenarios and Strategies

Cook Inlet RCAC found the scenarios contained in this section to be easy to read with useful information. Additionally, the decision to demonstrate cleanup capacity for the entire simulated blowout volume demonstrated prudent planning.

1.6.3.4 Scenario 4 – Swanson River Crude Oil Transmission Pipeline Rupture

Table 1-22 Scenario 4 – Scenario Conditions Swanson River Crude Oil Transmission Pipeline Rupture in Summer

This table references Figure 1-9 and describes the terrain surrounding the ruptured pipeline. There are inconsistencies between the description provided in the table and the actual terrain, specifically regarding the distance from the closest pond or lake to the rupture site.

RFAI: Please clarify the inconsistencies noted regarding the distance from the closest lake or pond.

Table 1-23 Scenario 4 – Response Strategy Swanson River Crude Oil Transmission Pipeline Rupture in Summer

(i) Stopping Discharge at Source. The table states that CISPRI is contacted and an ICS is initiated for the response and that CISPRI is notified to begin spill response operations. This wording is confusing.

RFAI: Please clarify these statements and describe these two separate actions, if necessary.

(ii) Preventing or Controlling Fire Hazards. This section states that access to the spill site is carefully controlled, however, Figure 1-9 does not show any roads leading to the spill site

RFAI: Please describe how responders will access the spill site and how the spill site access will be controlled.

(vii) Spill Recovery Procedures. For Task Force 2, the table lists a 6-inch Godwin pump and a 3-inch diaphragm pump. It also lists the use of a vacuum truck, if possible. For Task Force 3, it lists skimmers and temporary storage trucks. It also indicates the use of a vacuum truck from TF 3. Table 1-24 lists the equipment for the task forces and shows the vacuum truck listed under TF 2.

RFAI: Please clarify the location of the vacuum truck.

Table 1-24 lists two 60-inch Manta Ray skimmers with a de-rated oil recovery rate of 71 bph. However, the Manta Ray skimmer is rated by the pump it is teamed with.

RFAI: Please clarify which pump will be used with the Manta Ray skimmer to achieve a 71 bph recovery rate.

1.9 Response Scenario for an Exploration or Production Facility

This section states that HAK maintains a separate blowout contingency plan that is available for inspection by ADEC upon request.

RFAI: Cook Inlet RCAC recommends including a copy of the BCP for review in this RFAI. We also recommend AOCGG review the BCP.

2.0 Prevention Plan

2.1 Prevention, Inspection and Maintenance Programs

2.1.8 Leak Detection, Monitoring, and Operating Requirements for Crude Oil Transmission Pipelines

This section contains repeated remarks.

RFAI: Please remove repeated language.

2.2 Discharge History

This section references Appendix D for a record of oil discharges greater than 55 gal from HAK Cook Inlet production facilities from 1990 to the present; however, Appendix D was not included and available for review. Additionally, this section includes three figures (Figs 2-1, 2-2 and 2-3) that illustrate Causes of Spills, Number of Spills per Year and Spill Volume by Year, respectively. Per 18 AAC 75.425(e)(2)(B), the C-Plan must include the source, cause, and amount of each discharge. The information provided in this C-Plan is cumulative and summarizes the discharges by year. Additionally, it is unclear whether the Swanson River/KPL Crude Oil Transmission Pipeline is included in the discharge history.

RFAI: Please detail discharges greater than 55 gallons from HAK Cook Inlet production facilities and include the source, cause and amount of each discharge. Please specify whether the Swanson River/KPL COTP is included. If they are not included, please include discharge information for the newly-acquired Swanson River/KPL COTP.

2.6 Waivers

Waiver of Leak Detection Requirements for Swanson River Pipeline

This section contains comments regarding a waiver for leak detection requirements in the redline version of the ODPCP, but not in the final revision. These comments reference an ADEC waiver granted to Tesoro for the Swanson River Pipeline and references conditions of the waiver matching an Aerial Observation waiver that was to be included in the C-Plan. However no waiver is included. Additionally, it is unclear how this Tesoro waiver applies to a Hilcorp asset.

RFAI: Please clarify the relationship between the Tesoro waiver and the Hilcorp asset and include the Aerial Observation Waiver, if applicable.

Waiver of Tank Truck Loading/Unloading Area at Swanson River Field Lease Area Custody Transfer

This section states that ADEC granted the Union Oil Company of California a waiver from secondary containment requirements for the tank truck loading area at the Lease Area Custody Transfer (LACT) location at the SRF on May 12, 2008. Per 18 AAC 75.425 (e)(2)(F), the plan holder must provide documentation of approved waivers.

RFAI: Please provide documentation of the approved waiver.

3.0 Supplemental Information

3.1 Facility Descriptions and Operational Overview

3.1.2 Facility Storage Containers

This section references Appendix E for a list of ADEC-regulated oil tanks, storage tanks, and drum storage areas for all offshore platforms and onshore facilities. Appendix E was not included for review in this plan.

RFAI: Please include Appendix E for review.

3.1.4 General Description of Flow Lines and Process Facilities

This section references Appendix F for an overview of facilities and the locations of flow lines used to transport crude oil to onshore facilities. Appendix F was not included in the C-Plan for review.

RFAI: Please include Appendix F for review.

3.2 Receiving Environment

Table 3-2 Summary of Potential Impact Areas for HAK onshore Facilities

This table contains confusing language regarding the Swanson River Pipeline. It refers to numerous wetlands, drainages, and lakes throughout the Kenai National Wildlife Refuge (Figure 3-2, Appendix F). It is unclear whether the C-Plan refers to Figure 3-2 (General Diagram of Swanson River Pipeline Route) or a figure located in Appendix F, which was not available for review. The figure should identify wetlands, drainages, and lakes that identify all potentially impacted water bodies on a facility diagram. If this section refers to Figure 3-2, the diagram should identify and label the points listed.

RFAI: Please clarify which Figure this section is referring to and provide Appendix F for review.

Figure 3-2 General Diagram of Swanson River Pipeline Route

Figure 3-2 provides a good overview of the general route of the pipeline, but lacks resolution, which makes it difficult to clearly discern landmarks and areas of interest.

RFAI: Please provide a clearer version of this map to provide more clarity and definition.

3.4 Realistic Maximum Response Operating Limitations

3.4.1 Limiting Conditions

This section provides a good description of the effect of ice conditions on response activities. It is important to also note the effect of the ice on any transit times for response equipment, not just on recovery activities.

RFAI: Cook Inlet RCAC recommends including verbiage about the possibility of increased transit times for response equipment to arrive on scene.

3.11 Additional Information

This section provides a list of appendices that contain information required for compliance with the Oil Pollution Act of 1990 (OPA 90), however these appendices were not included in the C-Plan copy and were not available for review.

RFAI: Please include these appendices for review.