



"The mission of the Council is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and oil facility operations in Cook Inlet."

Members

*Tourism
Organizations*

*Alaska Native
Groups*

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Groups*

*Aquaculture
Associations*

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Organizations*

City of Kodiak

City of Kenai

City of Seldovia

City of Homer

*Kodiak Island
Borough*

*Kenai Peninsula
Borough*

*Municipality
of Anchorage*

January 28, 2019

Mike Evans
Industry Preparedness Program
Alaska Department of Environmental Conservation
555 Cordova Street
Anchorage, AK 99501

SUBJECT: Comments on RFAI response regarding BlueCrest Alaska Operating, LLC, Cosmopolitan Development Program Oil Discharge Prevention and Contingency Plan Major Amendment

Dear Mr. Evans:


Cook Inlet Regional Citizens Advisory Council (Cook Inlet RCAC) submits these comments on BlueCrest Alaska Operating, LLC's (BCAO) proposed amendment to their Oil Discharge Prevention and Contingency Plan as approved in 2015. The mission of the Cook Inlet RCAC is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and crude oil facility operations in Cook Inlet.

The purpose of the amendment is to address a reduction in their response planning standard (RPS) volume from 1,500 barrels of oil per day (bopd) to 1,000 bopd and to reflect changes to the gas-to-oil ratio (GOR) from 300 standard cubic feet (scf) of gas/barrel of oil to 10,000 scf GOR. While the RPS is being reduced, the increase in gas capacity results in a different plume size along with associated potential environmental impacts and the need for different response strategies and tactics.

In light of the changes that led to this plan amendment, Cook Inlet RCAC requests ADEC to confirm that AOGCC has reviewed the blowout contingency plan to ensure it remains adequate.

Our enclosed comments identify some areas for improvement and clarification to the amended plan sections. If you have any questions or wish to discuss this further, I can be reached at (907) 283-7222 or via email at MikeMunger@circac.org. Cook Inlet RCAC requests a findings document to be supplied at the end of this plan review.

Sincerely,

P.P. 
Michael Munger
Executive Director

Cc: Graham Wood



Comments and Requests for Additional Information

Regarding

BlueCrest Alaska Operating, LLC

Cosmopolitan Development Program

**Oil Discharge Prevention and Contingency Plan Revision 3 (Major
Amendment)**

Submitted

By

COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL

JANUARY 28, 2019

Overview

Introduction

Please review the document to fix grammar and typos.

Front Matter

Control Copy Plan Distribution List

Beginning on page 1-1, and throughout remainder of plan, Jeremy "Michaels" should be corrected to "Michels" and "Michaels Response Management" should be changed to "Michels Response Management."

1.0 Response Action Plan

1.1 Emergency Action Checklist

Table 1.1-1 Indicates that the BCAO HSE manager is replaced by the Alaska Manager. Please clarify if this is a title change or reflects a change in roles. Please clarify whether the Alaska Manager's qualifications are such that he or she could provide the same level of spill response safety as an HSE professional, and where the AK Manager resides.

1.6 Response Actions and Strategy

1.6.12.1 - Summer Scenario

Table 1.6.12.1-1 Scenario Conditions

Surface: The area past the berms includes bluffs, wetlands, shorelines, grassy areas, forested areas, creeks, and open water. Please clarify the approximate distance to the Mean Higher High-Water Line (MHHWL). This will help define the approximate affected bluff and beach area.

Table 1.6.12.1-2 Scenario 1 Response Strategy

This table includes a cross reference column that provides the cross-reference notations for figures and sections within this plan to aid in understanding the response strategy. However, a notation that identifies this plan as the source for the reference does not appear for all plan references within the column. The cross-reference column also includes what appear to be CISPRI Technical Manual tactics (e.g. CI-T-1, CI-TS-3, CI-TS-4). Recommend including "CISPRI Technical Manual" prior to each group of tactic references.

(i)Stopping Discharge at Source: *The Drilling Supervisor notifies the BCAO Response Coordinator and Anchorage HSE, who mobilize the Incident Management Team (IMT), the well control specialists, CISPRI, and make agency notifications. Please clarify if the*

Alaska Manager will make notifications as indicated in Table 1.1-1 or the On-site HSE Advisor as indicated in Figure 1.1-1

(ii) Preventing or Controlling Fire Hazards: This section indicates that BlueCrest maintains a Public Evacuation Plan. Please clarify whether this document is available as part of the plan for review.

An exclusion zone established as soon as possible. Traffic and security control are setup at least 15,535' from the blowout zone on the highway and along ATV trails, controlling traffic until state troopers arrive on-scene. A 15,535' area is identified as the "exclusion zone" yet on the maps the exclusion zone is marked as a 1,000 ft zone around the wellhead. An "evacuation zone" is delineated on the maps (blue circle) but a radius is not provided and an evacuation zone is not mentioned in the text of the response timeline. This "evacuation zone" radius does appear to correspond with a 15,535' "exclusion zone." Please clarify the evacuation zone and exclusion zone both in the text and on the map.

(iii) Surveillance and Tracking of Oil: *Aerial ROVs are used to surveil and detect oil in hard-to-reach locations that support spill clean-up operations. Please clarify if aerial ROVs are intrinsically safe and are able to fly if they encounter oil mist. (Both Scenarios)*

(iv) Protection of Environmentally Sensitive Areas and Areas of Public Concern: *There are numerous other gravel areas between Anchor Point and Nikiski that may be used as alternate or supplemental temporary storage areas; use of these areas may be considered as necessary. Please clarify if temporary storage will be selected from gravel areas between Anchor Point and Nikiski (75 miles away) or Anchor Point and Ninilchik (23 miles away). This comment applies to both scenarios.*

Based on the deposition modeling, sensitive areas that are likely to be affected by the blowout include CCI-02 (Starfield Creek). Please correct this to refer to "Stariski Creek. "Recommend stating "GRS Tactic..." prior to each GRS reference (i.e., CCI-01; CCI-02; should read GRS CCI-01; GRS CCI-02, etc.)

Public concern includes damage to private property and vehicles, and local wetlands. Please also add reference to anadromous and other fish as issues of public concern. This comment applies to both scenarios.

(vii) Spill Recovery Procedures: *An offshore drill rig is engaged to support relief well drilling operations. Engaging an offshore drill rig may not be an easy task. Please identify existing contractual arrangements for verification by ADEC. If there are contractual agreements in place, the name of the rig(s) should be included along with their estimated arrival time.*

Aerial and visual surveillance is set up to identify impacted areas and help prioritize which areas need prompt clean-up. Please clarify if this task is being performed by a SCAT team. If so, we recommend identifying the Task Force(s) the SCAT team will be assigned to and using this standard response terminology to aid in understanding job assignments.

Decontamination zones are set up at the staging areas, including the ability to decontaminate vehicles through an appropriate car wash. CIRCAC supports this

concept. Please clarify if the decontamination zones are dedicated to personnel or equipment. We also recommend that the tactic be described (or a description referenced elsewhere) and include the Task Force assignment with the necessary resources identified.

Task Force 3 North (TF-3N), Task Force 3 South (TF-3S), Task Force 4 (TF-4) and Task Force 5 (TF-5): Stage personnel and equipment outside of the blowout zone and wait for the well to be controlled. Please note what each Task Force's work assignment will be.

Sensitive areas, habitat and private property are cleaned up inland along with the highway. Please clarify which Task Force will be assigned to this task.

All other areas are cleaned up in-land. Please clarify which Task Force will be assigned to this task.

Teams continue to work until all on-water and shore-line oil is cleaned up the end of day 18. Achieving shoreline clean in three days seems ambitious after 15 days of deposition. Please confirm the number of teams that would be involved and describe how this would be accomplished so quickly.

(vii) Lightering Procedures: This section improperly numbered (**Both Scenarios**). Should be **viii**. All other subsequent sections should be renumbered accordingly.

Vessel lightering tactics are employed to periodically empty response vessels of recovered oil. Please clarify if a separate Task Force will conduct the lightering operations, and describe where this equipment will be staged.

Recovered oil from shoreline and in-land response efforts is pumped into Fastanks, then transferred by vac truck to the temporary tank farms in the gravel pits. This operation is technically not a lightering operation but a recovered product transfer operation. Recommend clarifying which tactics will be used to accomplish this task and any written transfer procedures that may be used.

(viii) Transfer and Storage of Recovered Oil/Water; Volume Estimating Procedure: *Recovered material is in the form of free liquid oil and oiled gravel from the pad, oil-water mixtures from on water response, decontamination of personnel and equipment, oil on vegetation, wildlife and property from in-land oiling, oiled sand, oiled debris and oiled wildlife from shoreline response. After 15 days of blowout during June, wildlife impacts are indeed possible. Please clarify what mitigation measures will be set up for wildlife recovery if necessary. Please describe the protocol for recovering, cataloging, and disposing of dead wildlife, both oiled and non-oiled.*

Liquid oil is recovered into Fastanks initially, then transferred by vac truck to temporary storage in 400-bbls tanks located in temporary tank farms created outside of the blowout zone. Recommend identifying which Fastanks are being used (42, 63, or 71 bbl). CISPRI Tech Manual does not list 400 bbl tanks. Please clarify the origin and style of these tanks. Recommend this section should contain a similar statement to that shown in Section ix, showing the quantity of 400 bbl tanks anticipated for use.

Oiled gravel is transported by lined dump trucks to a temporary aboveground lined pit that is created on gravel pits just to the north and south of the blowout zone to store the recovered oiled gravel until it can be treated per the ADEC-approved Waste Management

Plan created by the IMT for this incident. Please clarify if BCAO owns the gravel pits mentioned. If not, please describe the contractual arrangements or assurances are in place to ensure their use as described.

(ix) Plans, Procedures and Locations for Temporary Storage and Ultimate Disposal:

Secondary options for disposal include transportation by tank truck to Hilcorp for disposal into their injection well, and/or transportation by tank truck to Tesoro for refining (free oil only), if approved. Tesoro should be replaced with "Marathon."

(x) Wildlife Protection Plan: *Sensitive species and habitats are identified with the aid of natural resource trustee agencies. Further identification of wildlife species and habitats that could be impacted by a spill is done through the Cook; Inlet Subarea Contingency Plan: Reference to the Cook Inlet Subarea Contingency Plan Should be replaced with Arctic & Western Alaska Area Contingency Plan.*

Table 1.6.12.1-3 Scenario 1 Response Timeline: Summer Blowout:

Please list CISPRI tactics and Task force assignment in the time line to clarify when a tactic is being executed. This will help to gauge response asset coordination and timing.

+25: *Once the pad is evacuated and all personnel are accounted for, the lead operator or HSE Advisor notifies the BCAO Response Coordinator and Anchorage HSE. Please clarify which of these actions are carried out by the On-site HSE Advisor and the Alaska Manager.*

Anchorage HSE initiates call to regulatory agencies. Please clarify if the Alaska Manager or HSE On-site Advisor will make the notifications.

+ 2: *IMT initiates plan for temporary storage of recovered liquid oil in temporary tank farms to be built in gravel pits just north and south of the blowout zone. Please clarify which ICS section will carry out this action.*

+4: *Shoreline booms are setup north and south of exclusion zone to prevent oil from leaving exclusion zone. Vessels are deployed active/stand-by to prevent oil from leaving exclusion zone. Please clarify which tactics and Task Force will be used to accomplish this action. Please clarify vessels launched locations and staging areas for stand-by vessels (whether on water or on shore)*

Fastanks are set up outside the exclusion zone; recovery of free liquid oil that escaped secondary containment into fastanks using pumps and hose kits begins. Please review for clarity.

+Day 2: *TF-1N and TF-1S begin clean-up of on-water oil migrating outside of the blowout zone. Please clarify why on water recover does not start until day two. On-water recovery should be staged on-scene when shoreline boom is deployed (at hour +4) to minimize the spread of oil outside of the exclusion zone.*

+Day 16: *By the end of Day 16, any on-water that would have migrated out of the blowout has been recovered by TF-1N or TF-1S. Appears to be missing text after "on-water". Additionally, it is more likely that on-water oil recovery operations will continue*

until oil has been removed from all contaminated beach areas. As any oil residing on the beach, could leach into the Inlet and cause a sheen.

+Day 18: *TF-1N, TF-1S, TF-2N and TF-2S complete recovery. Clean-up is complete. Completing clean-up within three days after the well is under control is optimistic considering the blowout has been going for 15 days and approximately 1,320 barrels of oil will have impacted the shoreline, near-shore and/or marine waters. Please confirm that this could be achieved.*

1.6.12.2 Cosmopolitan Well Blowout During Winter

Table 1.6.12.2-1 Winter Scenario Conditions

Initial Conditions: There are differences in well diameter and breakdown of blowout intervals (i.e. 1-4 days in Summer and 1-3 in Winter). These variations cause a disparity in the blowout quantities identified in each scenario. Please clarify the reason for the differences.

(i) Stopping Discharge at Source: *The Drilling Supervisor notifies the BCAO Response Coordinator and Anchorage HSE, who mobilize the IMT, the well control specialists, CISPRI, and make agency notifications. Please clarify if the Alaska Manager or the onsite HSE advisor will mobilize the IMT, the well control specialists, CISPRI, and make agency notifications.*

(iii) Surveillance and Tracking of Oil; Forecasting Shoreline Contact Points:

Blowout plume is modeled using existing and forecasted winds. Refer to figures 1.6.12.1-1 through 1.6.12.1-4. This references figures associated with the Summer scenario. Please correct figure numbers.

(iv) Protection of Environmentally Sensitive Areas and Areas of Public Concern

5% of product is estimated to deposit on the bluffs. 24% of product is estimated to land on-shore or near-shore. 9% of product is estimated to land on-water.

Please confirm % of oil deposited against the barrel amounts cited in Initial Conditions. Again, we recommend putting "GRS Tactic..." ahead of CCI-01; CCI-02; etc.

Surveillance and deployment of on-water response equipment are crews will help identify and track oil moving to these GRS sites and respond to their oil prior to impact. Please clarify this statement.

40-60% open pack ice to the north and west, outside the blowout zone, may present a challenge for on-water response if oil migrates to it. Please include this important challenge in the Initial Conditions along with Sea State and Current.

3.0 SUPPLEMENTAL INFORMATION

3.10 Environmental Protection

3.10.3 Sensitive Resources and Priorities: On page 3.10-1 and 3.10-4, please check the ADEC Geographic Response Strategies (GRS) website and the Alaska Regional Response Team (ARRT) URL links for accuracy.

5.0 SUPPLEMENTAL INFORMATION

5.2 Response Planning Standards - Blowout

The first paragraph indicates that the *"maximum RPS volume to water is estimated at 4,800 barrels based on the winter plumes."* Based on the information contained in Figure 1.6.12.2-3 Deposition Plume for Winter Blowout (Full range), the volume should be 4,807 barrels. Please update this RPS volume.

Appendix C Oil Storage Tanks

Table C-1 Potential Storage Tanks for Production Well Projects: Please describe how often these tanks are used in the normal processes at the Cosmopolitan site, the likelihood of their availability in an emergency, any seasonal restrictions on their availability, and how they will be transported if not already on site.