



"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."

March 31, 2017

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

RE: Cook Inlet Energy's Oil Discharge Prevention and Contingency Plan for Cook Inlet Area Production Facilities (#17-CP-2016)

Dear Mr. Evans:

Cook Inlet Regional Citizens Advisory Council has reviewed Cook Inlet Energy's updated Oil Discharge Prevention and Contingency Plan for Cook Inlet Area Production Facilities #17-CP-2016) on behalf of our member entities. Our mission is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and crude oil facility operations in Cook Inlet.

Overall, the plan has improved from our review in the previous planning cycle. However, we have identified areas where additional clarity is required regarding the resources and parties involved, as well as places where updates should be considered. Regarding the Cook Inlet Oil Spill Model, while we always appreciate companies using tools that we develop, this model is no longer available or maintained.

We also highlight a serious concern regarding a reduction in manpower at Cook Inlet Energy facilities as presented in Table 2.1-1 Summary of Typical Onsite Personnel, which shows the number of personnel at some facilities reduced by half or more. We appreciate that the Department has found other operators' proposals to reduce on-site personnel unacceptable, and urge a judicious review of Cook Inlet Energy's proposed changes and their potential impact on safe operations, prompt detection of spills or potential spills, and swift and effective first response.

We hope the enclosed comments will be considered carefully by the ADEC and the plan holder. 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.

Sincerely,


Michael Munger
Executive Director

Cc: Graham Wood
Kristin Ryan
Commissioner Hartig

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Requests for Additional Information
Regarding
Cook Inlet Energy
Cook Inlet Area Production Operations
Oil Discharge Prevention and Contingency Plan
(ADEC Plan # 17-CP-2016)

Submitted
By
COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL

MARCH 31, 2017

Introduction

This plan covers production at the West McArthur River Unit (WMRU), West Foreland Pad, and Redoubt Shoal Unit, which includes the Osprey Platform and Kustatan Production Facility (KPF). Exploration activities are planned for the Sabre well site in summer 2017. There are storage units and pipelines spread among these sites.

1.0 Response Action Plan

1.1 Emergency Action Checklist

This section includes a list of actions for the first person to sight the spill. It is structured with “yes, no, N/A” options for a number of activities, and a space to enter time and initials. This form could be improved: (1) if the first person to site a spill is not supposed to do all actions listed (as indicated by the need to initiate actions when taken), then the form is not properly titled; (2) the lack of horizontal lines will make it easy to misunderstand actions to be taken or notes made (time and initials), and (3) not all items fit the “yes/no” structure.

1.2 Reporting and Notification

Table 1.2-1 Initial Spill Response Team/Emergency Contacts

Meridian is listed as providing alternates for inclusion in each Incident Command System (ICS) section. Please confirm they are approved by ADEC as a response action contractor.

Section 1.2.3 Agency Notification and Emergency Contacts

Table 1.2-1 Initial Spill Response Team/ Emergency Contacts - In this table, the Liaison Officer is shown “To Be Determined.” This is an important position in any response to complete the communications chain among the Responsible Party (RP), agencies, and stakeholders. Please clarify when the Liaison Officer position will be filled and by whom.

Table 1.2-2 Agency Notification Chart

Under DOT State Office of Pipeline Safety, the table lists the number for NRC and indicates both that this office will be “Contacted by NRC” and that “NRC will notify...” This is true in that once the RP notifies the NRC, NRC does in-turn notify other state and federal agencies via email and flash fax. This should be clarified and an agency specific phone number should still be provided to ensure that the RP or their designated representative can contact this office.

Section 1.2.4 Coordination with Other Plans

This section indicates that copies of the National Contingency plan, Alaska Unified Plan, and the Cook Inlet Sub-Area plan will be maintained by the Liaison Officer. CIE's Liaison Officer is "To Be Determined." Please clarify who will maintain copies of the above-mentioned plans until the Liaison Officer is determined.

1.3 Safety

1.3.1 General Safety Procedures

This section indicates that "General health and safety procedures for operational activities at spill sites are covered in CIE safety plans and procedures" and "The CIE Incident Commander (IC), assisted by its Safety Officer, is responsible for implementing these plans." There is no indication of what these plans say or where can they be found? This section should include enough information to provide response personnel with the steps to create an incident-specific safety plan as required at 18 AAC 75.425 (e)(1)(C) or identify and refer readers to the specific "CIE safety plans" where the necessary information can be found.

1.3.4 Evacuation Plans

Different formats are used for the figures in this section, with varying degrees of clarity. We recommend using a Google Earth or other aerial image with key areas marked clearly in contrasting colors and large fonts.

1.5 Deployment Strategies

1.5.1 Immediate Response Strategies

This section indicates that, "For larger spills, CISPRI or Meridian personnel would replace CIE personnel as they arrive onsite." A similar statement appears in Section 1.5.3 indicating, "CIE ICS members may be replaced by Meridian personnel as they arrive at the Command Post." Please clarify Meridian's role as a Primary Response Action Contractor as they are not listed in the ADEC Registered Oil Spill Primary Response Action Contractors database.

1.5.3 Utilization of Spill Contractor - On-Land Response

This section indicates tanker trucks would be transported by barge or by heavy lift aircraft. Low tide cycles may prohibit barge landing. Please clarify what size tanker truck will fit on heavy lift aircraft if delivery by barge is not possible during a low tide cycle.

Also, this section says, "During any time of the year it is assumed, that at a minimum, from one to two large landing craft and one barge could be obtained within the first 24

hours.” In summer many of the landing craft in the area are working under contract. Please clarify whether there will be any seasonal implications to being able to access support vessels quickly.

1.6 Response Strategies

Section 1.1.6 Procedures to Stop the Discharge - This section contains contradictory statements. The first sentence states, “Dispersant use or in-situ burning is not envisioned for onshore response efforts.” The second sentence states “However, in-situ burning will be considered, if appropriate, using CISPRI personnel and tactics.” Section 1.6.6 reiterates the first sentence, in that “Dispersant use or In-situ burning is not envisioned for onshore response efforts.” Please clarify when and if dispersants and/or in-situ burning will be considered and used.

1.6.3 Blowout Control

This section mentions having access to at least one jack-up rig in Cook Inlet and possibly another on Alaska’s Arctic Coast for a relief well if one was needed. If the one in Cook Inlet is the one being used by CIE for the Spartan well site, this should not be considered an option as it may be the site of the blowout that requires control. Assumptions regarding the availability of a rig on Alaska’s Arctic coast should also be reconsidered and may warrant updating.

1.6.5 Protection of Sensitive Areas

This section references Most Environmentally Sensitive Areas (MESAs). Please remove, as these are no longer maintained or included in the Cook Inlet Subarea Plan. Please also consider referencing specific Geographic Response Strategies (GRS) or the discussion in Section 3.10 where this information is provided.

Section 1.6.8 Damaged Tank Transfer and Storage

This section refers to CISPRI’s Technical Manual (CTM) for a list of pumps available. CTM Appendix A-6 only shows the deluge system for onshore response systems. Pumps have been removed from the CTM.

Section 1.6.10 Temporary Storage

This section indicates recovered oil and water will be hauled to Nikiski where it will be sent to Tesoro Refinery for processing. Please clarify if CIE has a contract or other agreement with Tesoro to accept recovered oil and water.

1.6.13 Response Scenarios and Strategies

1.6.3.1 Major Onshore Crude Oil Transmission Pipeline Spill

Table 1.6-1 Summary of Tactics and Equipment for the Onshore COTP Spill Response refers to the CISPRI tactic CI-NM-4 (burning oiled vegetation). The table does not list fire suppression equipment or materials to be on hand in support of this activity. Likewise, the CTM equipment inventory does not list equipment for burning vegetation; other than a heli-torch. Please clarify how vegetation burning and fire suppression will be accomplished. Additionally, other equipment listed includes Jon boats or inflatable boats or canoes. None of those vessels are listed in CISPRI's inventory. Please clarify the source for these vessels.

Table 1.6-2 Timeline for the Onshore COTP Rupture Spill Response refers to "IC Spill Response Team to the designated Command Center" in hour +0.5 and that the command center is activated in hour +1. However, there is no mention of when the command center becomes fully functional or fully staffed and operational. However, the Command Center is identified in table 1.6-9, and in Table 1.6-15 the Command Center is identified and it is also noted at hour +6 to have all of the IMT members assembled in the Command Center. Please clarify the status of personnel at the command center.

Between hours +2 and +3, a total of twelve CISPRI personnel are on site. While CISPRI does have 12 response personnel, at least three at any one time are assigned to CISPRI response vessel operations and would consequently be unavailable. Please clarify where the additional three personnel would come from.

At hour +4, it is stated that several small boats arrive by fixed-wing aircraft. The CTM does not list small boats capable of being loaded onto a fixed-wing aircraft. Please clarify where the boats come from and who owns them.

At hour +8.5, it is stated that thermal remediation phase begins at the spill site and approximately one acre of wetlands are impacted. There is no indication that fire suppression equipment or personnel are on site. The CTM indicates fire suppression is part of this tactic. Please clarify how this tactic is carried out safely.

Tables 1.6-5 and 1.6-6 indicate that at least 11 Section or Unit leads would be required. Table 1.6-7 includes equipment and personnel totals for two 12-hour shifts but does not include personnel at the Command Center, nor are the Command Center personnel accounted for elsewhere. Please clarify how these critical manpower assets are accounted for.

Recovered Oil Transfer and Storage

This section states that oil will be sold as crude, and separated water will be injected into a Class I, Class II or an enhanced oil recovery injection well. There is no mention in the scenario of total fluids recovered allowing an estimate of adequate storage capacity, nor is there any mention of decanting. Only recovered crude quantities are mentioned

given. Please clarify the procedure to separate recovered oil and water and what the final quantities of each are.

Temporary Storage and Disposal

This section indicates that oiled sorbents will be hauled back to the Nikiski for disposal at approved facilities. Please identify the disposal facilities.

Response Summary

Finally, the response summary includes 25 bbl of oil as being “removed by incineration practices.” This should not be included in the accounting of oil recovery for the response planning standard.

1.6.13.7 Offshore Platform Blowout – Osprey Platform

This scenario combines winter and summer scenarios, including descriptions, trajectories, protection of sensitive areas, containment and control, etc. Regulations at 18 AAC75.425 (a) (F) state, “the response scenario must be a usable as a general guide for a discharge of any size, must describe the discharge containment, control, and cleanup actions taken, which clearly demonstrate the strategies and procedures adopted to conduct and maintain an effective response,” also stating that, “if required by the department, the plan holder must provide additional response strategies to account for variations in receiving environments and seasonal conditions.” We do not feel that a combined winter and summer blowout scenario can clearly describe the significant differences in the plan holder’s ability to respond to an incident for this RPS. The scenario also only includes a timeline and equipment list for summer operations and does not take sea ice or cold temperatures into account to demonstrate an adequate response capability. ADEC has clearly demonstrated in this plan and in various other plan reviews that separate scenarios for winter and summer are required.

This section also states, “Additional Protection of Environmentally Sensitive Areas in Winter: Impact should be minimized since rivers and shorelines are covered by thick sheets of ice and snow at this time of year.” Cook Inlet winters have become widely variable, and snow and ice conditions must be prepared for, but should not be assumed for planning purposes. This should be considered in a separate winter scenario.

1.6.13.3 Blowout at WMRU - Summer

The description of the event indicates that the reservoir drilled from WMRU does not have sufficient pressure to flow significant amounts of oil to the surface without the assistance of a pump. Please clarify if the AOGCC has made that determination.

This scenario also describes a gas release and a 1000-ft exclusion zone. The well is not controlled until hour 72, but responders are pumping and recovering oil on the pad. Please consider whether there would be any safety considerations that would limit cleanup in this location.

Section 1.6.13.4 Blowout WMRU - Winter

This section indicates the WMRU Expansion Pad experiences an uncontrolled well release and is unable to control the flow from the wellhead.

Considering that this scenario takes place at the same facility as the summer scenario and the same circumstances of the discharge (blowout) are involved, it should follow that an uncontrolled release should have the same description with only the seasonal/ environmental conditions being different. Recommend including the language used to describe the blowout conditions as the summer uncontrolled release.

Section 1.3.13.6 Major Offshore Flowline Spill

This section seems to have abandoned the previous format that includes a timeline of response events. Table 1.6-27 does not provide a clear picture of the timeline for operations. Likewise, it is difficult to determine the vessels being used in this response due to mixed terminologies describing vessel classification e.g. OSRV #1, OSV #1, CIC#1, or Class 2 Vessel.

Table 1.6-27 lists CIC #1 & CIC #2. These vessels no longer appear in the CISPRI equipment inventory. Recommend updating table to include proper vessel classification. It is equally difficult to determine vessel operations schedule. Please clarify if all small vessels are in continuous operation for 24 hours.

1.6.13.8 Offshore Blowout - Sabre Exploration Rig

Procedures to Stop the Discharge

This section describes two alternate methods for procedures to stop the discharge, but does not describe what actions CIE would take as required under 18 AAC 75.425 (e)(1)(I) or 18AAC75.445(d)(2).

Discharge Tracking

This section references the Cook Inlet Oil Spill Model (CIOSM) program. While we are always pleased to see industry utilizing CIRCAC projects, in this case there could be better alternatives. The CIOSM program is no longer operational unless a working version has been copied and is still function. Currently it is our opinion that a better alternative is the NOAA GNOME program for spill trajectory modeling. Recommend using the GNOME program.

Table 1.6-39 Timeline for the Offshore Blowout at the Saber Site - 0 hour indicates all available response personnel are called in and that OSRV Perseverance and OSRV #2 OMSI are notified. Identifying the response assets by name and type are very helpful when describing a large response involving numerous assets. We recommend applying this approach throughout all scenarios within the plan.

2.0 Prevention Plan

2.1 Prevention Programs

Table 2.1-1 Summary of Typical Onsite Personnel

This table indicates a substantial reduction in personnel. The Kustatan Production Facility (KPF) shows a reduction of more than half of its personnel. This is very difficult to understand given the consolidation with the West McArthur River Production Facility, making the KPF facility CIE's main storage facility. This reduction in personnel is equivalent to the reduction in personnel at Drift River Oil Terminal, another remote crude oil storage facility, that the department determined insufficient to safely oversee operations and response at the facility. We urge the Department to scrutinize CIE's remote operations to determine that each has an adequate personnel level that meets regulatory compliance to quickly detect and respond to a spill event.

2.1.2 Prevention Training Programs

Section 2.1.2 states, "Spill prevention training for CIE's employees includes familiarization of employees with the State of Alaska's pollution prevention regulations. CIE's Spill Prevention Training meets the requirements of 18 AAC 75.020." However, this section does not include the following information as specified in that regulation:

- The means of achieving the identified training objectives, including training subjects, schedules, frequency, and types;
- A description of any licenses, certifications, or other prerequisites needed to hold a particular job.

CIRCAC requests that Cook Inlet Energy provide the information listed above.

2.1.3 Substance Abuse Programs

Section 2.1.3 states that CIE has a substance abuse policy, including monitoring "and in accordance with 18 AAC 75.007(e)." It does not include a description of the types of substance abuse test programs (random, scheduled, or combination), the nature of the test performed, or the total number of tests per employee per year as described in ADEC Guidance. Please include this information.

2.1.4 Medical Programs

Similar to Section 2.1.3, this section states that the medical monitoring program complies with regulations. It does not describe the physical conditions screened for, methods, or frequency of screening as described in ADEC Guidance. Please include this information.

2.1.8 Oil Storage Tanks

This section describes the tank used at the various facilities covered in the plan. Language regarding Tanks 1-4 at the WMR-PF has been changed: where it previously referred to decommissioning the tanks in 2016, it now states (in Section 2.1.9) that these will be used for off-spec oil after the WMR-PF/KPF consolidation project is completed. Figure 2.1-1 states that all equipment at the WMR-PF except Tank 5 will be decommissioned in 2017. Please clarify whether Tanks 1-4 will be decommissioned in 2017 and, if not, how they will be made suitable for continued use.

2.1.9 Secondary Containment Areas

This section states that secondary containment areas will be inspected “during operator inspection rounds” which are conducted daily. This language has changed: the inspections used to be conducted twice per day. Please explain if this is related to the reduction in personnel numbers at several facilities as identified in Table 2.1-1 and how it will affect the prompt detection of a spill or potential spill.

2.2 Discharge History

This section provides a good overview of past spills. A clear description of corrective actions is provided for most of the spills. To complete this section, we suggest that the status of corrective action taken after a March 2014 oil-based mud spill at WMRU should be reviewed and updated if appropriate. It refers to then-future actions that will be taken to change mud pump parts. If these have been completed, this should be noted in Table 2.2-1.

3.0 Supplemental Information

3.4 Realistic Maximum Response Operating Limitations

Table 3.4-1 is labeled, “Mechanical Response Limitations,” but it actually shows the Beaufort Scale. Please change label or table contents, as appropriate.

In the discussion of wind, it states that CISPRI’s skimmers can operate in sea conditions up to a Beaufort 6 (associated with 22-71 knot-winds). However, there is no discussion of the impact of these winds on containment, which is critical to skimming operations. Please re-consider the discussion of wind impacts on mechanical recovery.

3.7 Non-mechanical Response Equipment

This section does not discuss the environmental consequences of in-situ burning and provisions for monitoring environmental effects of any non-mechanical response options as required in 18 AAC 75.445(h). Please provide the missing information.

3.8 Contractor Information

The Alaska Chadux Corporation is listed in several places of the plan as providing response services. Please include the contract for their services in this section or remove.

3.9 Training

This section discusses general training objectives, but does not provide specific information about the degree of training provided and for which job descriptions. This section mentions training on tank alarms and response procedures. It is unclear who will complete this training, for how long, and how often. This also should describe training for firefighting, monitoring for toxic gases and explosive/combustible atmospheres.

A table of the different positions and the types (and length and frequency) of training received would help clarify this section. Please provide this additional information.

4.0 Best Available Technology Review

4.3 Leak Detection Systems for Crude Oil Pipelines

This section refers to an ADEC BAT review from 1999. Please update and consider whether any of the technologies discussed at ADEC's 2011 BAT conference focused on pipeline leak detection warrant consideration in the BAT analysis presented here.

4.4 Leak Detection Systems for New Oil Storage Tanks

This section describes how visual and olfactory sensing (of oil that has drained from a tank into secondary containment) is preferred to the use of electronic sensors. Please address how this detection may be affected by snow/ice. (There is also a gauge system in use, but the plan notes that its effectiveness will be compromised by the normal fluctuations in tank levels.)

4.6 Maintenance of Existing Buried Steel Piping

Please clarify whether the coatings option identified (Petrolatum wrapping) has been applied, or when it will be (through the course of maintenance, etc.).

4.10 Source Control Procedures

4.10.2 Major Onshore Oil Storage Tanks

This section discusses source control for the tanks located at CIE's various facilities. The section indicates that all major existing onshore tanks have high level alarms and automatic/emergency shutdown switches that can immediately stop transfers to or

from tanks by shutting down transfer pumps. Recommend specifying the location of the emergency shutdown switch to best describe this source control procedure.

4.10.3 Offshore Oil Storage Tanks

This section discusses source control for *offshore* oil storage tanks on the Osprey Platform and rig at the Sabre well. One source control option is to transfer recovered fluids to a 500 bbl test tank using hoses available on “the vessel.” Please clarify the location of the test tank, type of hoses, and on what vessel the hoses would be found (or an alternative location).

4.10.4 Crude Oil Pipelines/Gathering Lines

The WMRU system has double-walled piping. This section presents the “placing the existing pipe with double-walled piping at the main stream” crossing between WMRU and KPF as an option (see Section 2.1). Please clarify whether this should state “replacing” and, if so, why this double-walled piping is not considered BAT.

Table 4.10-1 BAT Review for Source Control Procedures for Major Onshore Oil Storage Tanks

This table indicates that CIE maintains a stock of Wood and steel onsite that could be used to plug small leaks and cracks in the tanks. There are commercial tank patching kits and materials that contain various pre-cut and pre-sized materials that also include various epoxy and threaded plugs. Please clarify if the stocks of wood and steel are set up and configured in such a way as to be readily available and suited for patching storage tanks in the field and consider comparing their use to a commercially-available kit.

Table 4.10-3 BAT for Source Control Procedures for Onshore Pipelines

This table indicates that CIE maintains a stock of wood and steel onsite as patching materials that could be used to plug small leaks and cracks in the pipelines. Because this approach is in use, it is considered feasible. However, there are numerous pipe plugging and patching kits available commercially that are pre-made to fit various sizes of pipe and could be used for various pipeline leak causes, e.g. rupture cracks and splits of various lengths and widths, holes of various sizes, pre-cut plugs and wedges of various sizes with rubber pads and strapping, and non-sparking tools. These kits are inexpensive, are readily available, and are the accepted method for patching a leaking pipe. Please clarify if the stocks of wood and steel are set up and configured in such a way as to be readily available and suited for patching pipes in the field and consider comparing their use to a commercially-available kit.

4.11 Trajectory Analysis

This section should be updated. CIRCAC’s Cook Inlet Oil Spill Model (CIOSM) was developed for a project and is no longer in use. Instead, we recommend that NOAA’S

GNOME model be used for trajectory analysis during a spill. The ADIOS model should be removed: it models oil weathering but does not provide trajectory.

4.12 Wildlife Capture, Treatment, and Release Programs

This section references the “Wildlife Guidelines for Alaskan in the Alaska Region Oil and Hazardous Substances Pollution Contingency Plan produced by the Alaska Regional Response Team.” Please clarify the reference.

Additionally this section references the CISPRI Wildlife Capture and Rehabilitation Center and its design purpose. The CISPRI Technical Manual references the Alaska Wildlife Response Center (AWRC) and the Sea Otter Rehabilitation Center (SORC). Please clarify the resource or resources that will be used.

5.0 Response Planning Standards

This section summarizes the Response Planning Standards (RPS) for the facilities covered by this plan.

This section states that for an **exploration facility** (the Sabre well site), the RPS will be 5,500 bpd for a maximum of 15 days, unless information provided by CIE and evaluated by AOGCC demonstrates that a lower RPS volume is appropriate. However, the regulation at 18 AAC75.434(b) states that the RPS for an exploration facility is 16,500 bbl *plus* 5,500 bpd for a maximum of 15 days. We understand that AOGCC has estimated a total RPS of less than or equal to 1,500 BPD for 15 days for the Sabre exploration drilling based on review of CIE information. Please verify that AOGCC has reviewed CIE’s technical documentation for a lower RPS volume as that information is not provided in the plan and it results in a significantly reduced RPS for this Cook Inlet site.

This section also states that for a **production facility**, the RPS is three times the average daily oil production volume for assisted-lift wells. (All CIE wells are assisted lift.) The plan cites 18 AAC75.434. Table 5-1 specifies a “flow rate” of 1500 bopd for the Osprey platform. Please clarify that the average daily oil production volume - on which the RPS should be based according to 18 AAC75.434(e) - is the same as this flow rate.

Table 5-1 also provides a simplified formula for the RPS for crude oil transmission lines at KPF and WMRU. Please provide details to support the calculations used.

Appendix A

Well Control Procedures/Well Control Incidents

Level 1 Well Control Incident - This section (bullet six) references failure of a SCSSV to test. It is customary to use the written out title before an acronym and is helpful even if the acronym appears in a glossary. Please clarify the meaning of BOP. Recommend adding SCSSV to the glossary.

Level 1 Well Control Incident - This section references situations that are considered typical Level 2 Well Control Incidents. It is customary to use the written out title before an acronym and is helpful even if the acronym appears in a glossary. Please clarify the meaning of BOP and ESD. Recommend adding ESD to the glossary.

Level 3 Well Control Incident - This section references the “platform” in regards to a Level 3 Well Control Incident. However, Level 3 Response Actions do not seem to include platform incidents, such as evacuating all personnel, establishing a Control Zone, and securing the location.

Please clarify Response Action differences for platform Level 3 Well Control response actions.

Table 1.6.A-3 Summary of Specialty Well Control Equipment

Athey Wagon-Logistical Considerations - This section indicates that the equipment is located on the North Pole. Please clarify the location (North Pole, AK; North Slope; or actual North Pole?).

Appendix B SDS Sheets - This appendix contains two Safety Data Sheets (SDS). One of the sheets is titled using the previously-used *Material* Safety Data Sheets (MSDS), although it is good to see that the sheet is organized in the Globally Harmonized System (GHS) format. Recommend verifying whether the MSDS has been replaced by the manufacturer in the SDS title and format.

Page Headers - Please clarify which company title, Glacier Oil or Cook Inlet Energy, is the proper title for this plan.