



*"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*

March 7, 2013

*Alaska State Chamber of Commerce*

Ms. Dianne Munson  
Environmental Program Specialist  
Alaska Department of Environmental Conservation  
Industry Preparedness Program  
555 Cordova Street  
Anchorage, AK 99501

*Alaska Native Groups*

*Environmental Groups*

Re: Comments on Request for Additional Information Response prepared by  
Buccaneer Alaska Operations Cook Inlet Exploration Program – ADEC Plan  
Number 11-CP-5097

*Recreational Groups*

Dear Ms. Munson,

*Aquaculture Associations*

Cook Inlet Regional Citizens' Advisory Council (Cook Inlet RCAC) has reviewed the response to requests for additional information (RAFI) prepared by Buccaneer Alaska Operations for the Cook Inlet Exploration Program Oil Discharge Prevention and Contingency Plan on behalf of our member entities. Cook Inlet RCAC is a nonprofit corporation that represents the citizens of Cook Inlet in promoting environmentally safe marine transportation and oil facility operations in Cook Inlet.

*Fishing Organizations*

Cook Inlet RCAC remains concerned regarding Buccaneer's operations during ice season and the measures in place to mitigate and respond to that risk. We conducted a thorough review of the contingency plan submitted for review. The planholder's revisions to the plan appeared to be generally responsive to the RAFI comments prepared by ADEC on behalf of Cook Inlet RCAC and other named reviewers.

*City of Kodiak*

Specifically, a winter blowout scenario was included and substantive discussion was provided regarding ice monitoring with regard to the Southwest Alaska Pilot's Association, the National Weather Service and the latest available technology. Additionally, the redline version provided to Cook Inlet RCAC enabled the reviewers to plainly see the changes made to the document and was useful in the review.

*City of Kenai*

*City of Seldovia*

*City of Homer*

After reviewing the additions and revisions, we found that there are still some outstanding information requests that Buccaneer's RAFI response did not completely address. We recommend additional explanation or clarification of these areas prior to final plan approval.

*Kodiak Island Borough*

*Kenai Peninsula Borough*

An item of concern noted in our c-plan review was an underlying negative tone contained in parts of the Request For Additional Information (RAFI) response from Buccaneer.

*Municipality of Anchorage*

From our perspective the narrative provided in response to the department's RFAI should focus primarily on improving a plan's regulatory compliance and usefulness; it was disappointing to encounter this issue.

### *Ice Operations*

*Encroaching Ice Concentrations and Curtailment.* Although Buccaneer provided additional discussion regarding ice monitoring and weather observations, the RFAI response does not address Request No. 8. There still remains considerable ambiguity in the C-plan regarding Buccaneer's operations up to and beyond 10% ice concentrations. Buccaneer's response cites procedures to entrust curtailment and suspension activities to the Drilling Supervisor's discretion according to their policies, but the C-plan does not provide adequate detail about these policies and actions. It is important that the C-plan provide very specific, detailed criteria for curtailment, shutting in operations, and potentially restarting operations based on observed ice conditions. In order to understand the risk posed by Buccaneer's operations and to evaluate their preparedness to respond to a spill, it is critical that their ice operating standards are clearly defined.

Buccaneer did not respond to the three RFAI No. 8 requests: 1) the plan must clarify whether Buccaneer would need to move the rig when ice concentrations are greater than 10%; 2) it must clarify whether Buccaneer will wait until ice concentrations are greater than 10% to discontinue all drilling operations or suspend operations until ice goes below the 10% concentration; and 3) the plan must clarify whether Buccaneer would curtail operations for the entire season in the event of 10% concentrations or intends to restart once concentration is below 10%.

The .5 mile definition of "vicinity" raises concerns. Ice conditions can change very rapidly due to tides, currents, and wind conditions and can move great distances in a short period of time. Additionally, the weather conditions can vary significantly across the region in the winter months, which can contribute to uncertainty and unpredictability. By establishing a .5 mile threshold for curtailment and suspension actions, it does not provide a significant buffer to take action to mitigate risks from the ice. Buccaneer should justify how a .5 mile distance will allow sufficient time to react to encroaching ice.

Cook Inlet RCAC recommends that Buccaneer monitor ice conditions from a greater distance than .5 miles, to allow the decision makers more time to assess the composition, direction and speed of travel of the ice to determine its potential impact on operations. RFAI No.60 discusses the identification of pre-established "trigger points," specific limits, and subsequent required actions, which would require curtailing or suspending operations. Buccaneer's response included some "trigger points," but did not include any specific limits or subsequent required actions. Guidelines should be established to compel action based on observations by the Drilling Supervisor, allowing ample time to assess and evaluate the conditions. It would be prudent to set the pre-established distance at a radius that would give the Drilling Supervisor enough time to gauge the potential threat posed by encroaching ice.

The uncertainty and unpredictability of weather and ice conditions creates a measure of risk to the drilling operation. Real-time observation and data analysis are critical to taking necessary action to mitigate that risk. The list of sources of information provided by Buccaneer as a “starting point” for ice observations does not include consistent real-time data. The additional resources provided by Buccaneer are either not currently available or use time-delayed data. The coastal ice conditions experienced in parts of Cook Inlet are subject to variations in wind, tide and current conditions. This could result in ice movement that can alternately risk the rig location or drift away from the rig. The presence of any ice in Cook Inlet during drilling operations poses some degree of threat. Until any ice transiting that portion of the Inlet is well south of the drilling location, it must be monitored for any threat to the drilling operation. RFAI No. 10 requests that Buccaneer provide these specific details to include additional reliable methods to monitor coastal and sea ice. Cook Inlet RCAC recommends Buccaneer include these other sources of real-time information in the C-plan to meet DEC’s request.

Buccaneer provides a description of specific curtailment actions taken for a list of planned and unplanned critical actions in response to RFAI No. 58. Cook Inlet RCAC recommends all appropriate agencies thoroughly review these actions to ensure the actions are appropriate and meet industry standards. AOGCC has proven to be well-suited to accomplish this task.

*Realistic Maximum Response Operating Limitations.* The RFAI response did not fulfill the requirements of 18 AAC 75.425 (e)(3)(D) and did not respond to RFAI Request No. 42. Specifically, it does not include an analysis of the frequency and duration of the limitations that would render mechanical response methods ineffective. Even when ice concentrations are below the 10% threshold, the presence of ice will affect any response. A discussion and consideration of these effects and of additional prevention measures that will be put in place when conditions exceed RMROL is essential in planning an effective response.

*Well control.* RFAI No. 16 requests the planholder include a discussion of how ice conditions may affect or limit well control operations. This is not adequately discussed in the plan or in the RFAI response. There is no mention of any discussion with Wild Well Control regarding this issue.

### ***Winter Blowout Scenario***

Buccaneer included a winter blowout scenario in response to comments and requests for information from the ADEC and other named reviewers. However, there are issues that still need to be addressed. The scenario is set in mild temperatures that do not reflect conditions that include ice. Additionally, the tactics and strategies do not consider response in ice conditions. Overall, the scenario does not present many differences from the summer scenario. The scenario also describes the primary drivers for slick movement as current, wind and tides. Since the operations can occur in ice concentrations up to 10%, some consideration should be given to the effect ice will

have on any oil slick movement. There is no discussion included in the scenario. The scenario's discussion of protection of sensitive areas includes CISW-01, but based on the oil spill trajectory, CCI-02, CCI-03, CISW-02 and CISW-09 should also be planned for and considered as possible vulnerable sensitive areas. There are additional inconsistencies throughout this scenario (e.g. Ro-boom lengths, personnel assignments, and CISPRI shipboard firefighting role).

Cook Inlet RCAC recommends thoroughly reviewing the scenario and exercising this plan through drills to ensure the prescribed actions are effective and achievable. As always, we request a findings document upon approval of this plan.

If you have questions regarding our comments, please contact me at 283-7222 or [munger@circac.org](mailto:munger@circac.org).

Sincerely,



Michael L. Munger  
Executive Director