



**Comments and Requests for Additional Information**

**Regarding**

**Buccaneer Alaska Operating, LLC**

**Cook Inlet Area Onshore Operations, Major Amendment West Eagle Prospect  
Oil Discharge Prevention and Contingency Plan**

**Submitted**

**By**

**COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL**

**APRIL 18, 2013**

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## General Comments

As an amendment to Buccaneer's Cook Inlet operations oil discharge prevention and contingency plan (ODPCP or C-plan), the West Eagle amendment was lacking in some key site-specific information needed to demonstrate compliance.

The Amendment did not include any response scenarios. While many of the same personnel, strategies, tactics and equipment would be employed during a spill at the West Eagle site as for other Buccaneer Cook Inlet operations, the terrain, topography and location at West Eagle are different from the other Buccaneer sites and should be accounted for in the spill response planning. Spill response scenarios provide an opportunity to demonstrate that Buccaneer can mount an effective response at this specific location.

There are no existing GRS in the vicinity of the West Eagle Prospect. If a spill were to occur at this site, it would significantly affect sensitive areas and wildlife. The development of applicable GRS for inland sites would be useful for spill response planning and we would encourage the planholder's participation in a GRS development work group. This would allow Buccaneer to prevent environmental damage to the wetlands and sensitive habitats located near the West Eagle site.

Finally, we recommend a thorough proof-reading of this C-plan Amendment. We noted typographical and syntax errors throughout.

## Introduction

The Introduction contains references to the Cosmopolitan Prospect. It is unclear whether the Cosmopolitan Prospect will be developed from both offshore and onshore locations.

*RFAI: Please clarify whether the Cosmopolitan Prospect will be developed from both onshore and offshore and should be included in this Amendment.*

## 1.0 Response Action Plan

### 1.6 Response Scenarios

No response scenarios were provided for the West Eagle Prospect. Although many of the tactics used in the scenarios already approved under this C-plan are applicable, this site location differs from the North Sterling and Cosmopolitan sites. Its remote location presents different challenges in a spill response, can affect the planholder's timeline for response, and warrants additional, site-specific scenarios. Per 18 AAC 75.425 (3)(1)(F), the spill response scenarios must demonstrate a planholder's ability to respond to a discharge within the required time frames using resources described in the contingency plan and that identifies the spill location, time of year, time of day, the source and cause of the spill, etc.

*RFAI: Cook Inlet RCAC recommends that a summer and winter scenario should be developed for this site and included in this C-plan.*

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## 1.8 Facility Description

### 1.8.C.1 Operational Overview

Onsite Facilities. This section refers to an adjacent site for the use of obtaining gravel for the drilling site, storage and parking. It is unclear whether these lands are part of Buccaneer's existing lease described under Land Ownership or whether they will require additional negotiation with the State or Borough.

*RFAI: Cook Inlet RCAC requests clarification of the lease holdings for the additional lands and adjacent material site.*

Per 18 AAC 75.425 (e)(1)(H), the planholder is required to include a plan diagram of the facility for reference in conducting emergency response operations, with locations of response equipment and other features clearly marked. This C-plan amendment does not contain a plan diagram for the West Eagle prospect.

*RFAI: Please include a plan diagram for the West Eagle Prospect in accordance with the requirements described in 18 AAC 75.425 (e)(1)(H).*

Per 18 AAC 75.425 (e)(1)(i), the C-plan must include alternative procedures for the transport of equipment, personnel, and other resources to the spill site in adverse weather conditions. The C-plan contains routine site access information and a general statement that there are no seasonal constraints identified for the activities or spill response. In the event of adverse weather, the planholder must consider alternative methods of transporting personnel, equipment, and resources. This should include provisions for heavy snow when the road (discussed in 1.8.C.3) may not be passable.

*RFAI: Please provide alternative methods of transporting personnel, equipment, and resources in adverse weather conditions in accordance with 18 AAC 75.425 (e)(1)(i).*

### 1.8.C.3 Environmental Considerations

General. This section states that access to the site is on existing road systems. The Site Access section (1.8.C.1) describes the access road as a "seasonally maintained gravel access road." Although the maintenance of the road throughout the seasons, to include plowing, would be integral to Buccaneer's operations, it is not listed as an environmental consideration. Any lack of maintenance on this gravel access road would pose serious challenges to response assets.

*RFAI: Cook Inlet RCAC recommends including verbiage regarding the maintenance of this gravel access road.*

### Figure 1.8.C.2 Potential Plume Impact Area for the West Eagle Well #1

This figure does not include a compass rose.

*RFAI: Cook Inlet RCAC recommends including a compass rose to indicate direction and orientation and provide a clearer picture of the facility location and drainage routes.*

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### 1.8.C.5 Considerations of Oil Plumes

This section refers to containment points which are located over a mile from the pad. With the exception of one containment point (CP-1), the remaining containment points are located outside of the 6,000-ft radius from the well site. By locating the majority of the containment points outside of the 6,000-ft radius, the strategy will be to chase the sheen, rather than intercept it within the 6,000-ft radius and minimize the impact of the spreading oil. A more aggressive strategy would be to locate containment points within the 6,000-ft radius and use the existing containment points as backup locations should the oil escape beyond the 6,000-ft radius.

This section also states that there will be sufficient deposition thicknesses out to 300m from the blowout and predicts that the deposition rates will diminish at distances further out. If that is the case, there will still be over 5,000-ft of remaining space within that 6,000-ft radius to intercept the oil before it leaves the radius.

*RFAI: Cook Inlet RCAC requests clarification of the strategy to locate containment points 2-5 outside of the 6,000-ft radius.*

**Communications:** This section gives a general statement regarding the communications system for an evacuated site, which would include cellular communications. It also states that additional CISPRI equipment could be mobilized as required. Per 18 AAC 75.425 (e)(1)(D), the planholder must include a description of field communications procedures, including assigned radio channels or frequencies, if applicable. This section is unclear regarding communications procedures for a site that is not evacuated as well as once the blowout is capped and recovery operations begin. There is not sufficient detail to understand what communications systems will be used.

*RFAI: Please clarify which communications systems will be used for all operations during a spill response. Please include any radio channels or frequencies, if applicable.*

#### **Table 1.8.C-2 Potential Plume Impact Area for the West Eagle Well #1**

The terminology used in Table 1.8.C-2 is confusing. It refers to "collection" points and labels it "CP," but refers to these as "containment" points in Section 1.8.C.5. While containment and collection may occur concurrently, they are two different activities.

*RFAI: Cook Inlet RCAC recommends correcting the terminology for consistency and to avoid confusion.*

This table refers to CP-2 as a primary containment area for spill recovery if the blowout were to affect the east side of the possible plume area with impacts to Swift Creek. Upon examining Figure 1.8.C-2, there appear to be a minimum of four areas that could possibly serve as natural collection areas to intercept the oil prior to leaving the 6,000-ft radius area. There are similar natural collection points for the Anchor River drainage.

*RFAI: Please provide the rationale for the selection of the containment points and for not including other possible natural collection points for Swift Creek and Anchor River.*



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### 1.8.C.6 Evacuation Plan

Assembly Points. The language in this section is unclear regarding accountability. It instructs evacuating personnel to remain on the drilling pad or access roads (if safe) when leaving the site and traveling to an office or designated assembly point so onsite supervisors can more easily locate and account for onsite personnel. This section does not give clear instructions for evacuating personnel to muster for formal accountability. It gives the impression that onsite supervisors will informally look for onsite personnel as they transit.

*RFAI: Cook Inlet RCAC recommends clarifying the procedures for evacuating onsite personnel in this section to avoid confusion and provide clear, direct instruction for accountability and transit.*

There is no reference to a plan diagram of the provided as required by 18 AAC 75.425 (e)(1)(H).

*RFAI: Please include a plan diagram as required by the regulations.*

Evacuation of Injured Personnel. This section states that personnel with minor injuries may be transported to Kenai or Soldotna for treatment or further transport to Anchorage. It is not clear why these personnel would not be transported to the hospital in Homer.

*RFAI: Please provide the rationale for transporting personnel to Kenai, Soldotna or Anchorage versus Homer.*

Evacuation of Local Residents. This section provides a general statement about the proximity of local residents to the well site and their notification in the event of a well blowout. It does not provide any description of the likelihood of an evacuation in the event of a blowout or procedures the planholder would employ to notify residents.

*RFAI: Cook Inlet RCAC recommends providing amplifying information regarding the likelihood of evacuation by local residents in the event of a blowout and a description of specific procedures the planholder would take to notify local residents.*

### 1.8.C.7 Relief Well Considerations

Relief Well Drilling Rig: when referring to equipment necessary to disassemble/reassemble rig, this section states, "For planning purposes, it is assumed that this equipment would be mobilized from the Kenai/Soldotna area." This statement is ambiguous whether the planholder already has access to this equipment or agreements in place. For all aspects of the response, it would be prudent planning to ensure that the equipment would be available to the planholder use during the response and that agreements would be negotiated in advance.

*RFAI: Please clarify whether the planholder already has agreements in place for the use of this equipment and/or that it will be available to them for use during a spill response.*

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### 3.10 Protection of Environmentally Sensitive Areas

Sections 3.10.1 and 3.10.5.6 provide a general description of sensitive areas and refer to the applicable Subarea Contingency Plan and Geographic Response Plans. Although there are no existing GRS's in the vicinity of this site, the potential for harm to the sensitive areas and wildlife will be significant in the event of a spill. We encourage the planholder to develop applicable GRS for their inland facility locations.

*RFAI: Cook Inlet RCAC encourages Buccaneer Alaska to develop a GRS that addresses the specific response strategies needed for an effective spill response at the West Eagle prospect.*