



**Comments and Requests for Additional Information**

**Regarding**

**Buccaneer Alaska Operating, LLC  
Cook Inlet Area Onshore Operations,  
Oil Discharge Prevention and Contingency Plan  
West Eagle Prospect Amendment**

**Submitted**

**By**

**COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL**

**JUNE 25, 2013**

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## General Comments

Cook Inlet Regional Citizens Advisory Council (Cook Inlet RCAC) appreciates the plan improvements made in response to the previous Request for Additional Information, including the addition of the winter and summer blowout scenarios for the West Eagle Prospect location.

The comments included here essentially fall into two categories: (1) items of concern to the Cook Inlet RCAC that were not satisfactorily addressed in the recent plan amendments and (2) items related to the newly added scenarios.

There are no existing geographic response strategies (GRS) in the vicinity of the West Eagle Prospect. The development of applicable GRS for inland sites would be useful for spill response planning and we would encourage the planholder to take the lead in preventing environmental damage to the wetlands and sensitive habitats located near the West Eagle site by developing applicable GRS for the area.

Finally, we recommend a thorough proofreading of this C-plan Amendment. We continue to note typographical and syntax errors throughout.

## 1.0 Response Action Plan

### 1.6 Response Scenarios

The addition of summer and winter blowout scenarios for this location strengthens the plan. Cook Inlet RCAC reviewed the newly developed scenarios, and provides the following comments and requests. Some of these comments also relate to the scenarios that were already included in the plan, as the new scenarios are very similar.

#### General

As this plan now includes three separate locations, clarity would be improved if the associated operations or location are included in the naming of each of the six scenarios.

*RFAI: We suggest re-naming the scenarios so each clearly refers to its specific location, as was done for the most recently added winter and summer blowout scenarios at the West Eagle Prospect location near Homer.*

#### **Table 1.6-25 and Table 1.6-33 (Response Summaries)**

The summary tables for each of the new scenarios reference response techniques in both the CISPRI Technical Manual and in Appendix 1.6.B. The need for two different sets of tactics is not clear; we suggest that the CISPRI Technical Manual should be the primary resource and additional tactics are not needed unless a specific reason is provided.

Similarly, the tables reference the Cook Inlet Subarea Contingency Plan without pointing to a specific part of that plan; this reference should identify a specific plan section.

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*RFAI: References to specific response tactics or techniques should rely first and foremost on the CISPRI Technical Manual, or a clear reason should be given why a separate list of tactics/techniques is needed and that Buccaneer personnel and/or CISPRI personnel are trained and available to implement the response technique or tactic within the timeframe provided. Where the Subarea Contingency Plan is referenced, a specific section should be noted.*

**Table 1.6 - 26 (Response Timeline - Winter Scenario)**

The response timeline warrants reconsideration, including: (1) establishing the Unified Command prior to the +8 hours specified; (2) verify that the overflight with well control specialists (at 27 hours) is consistent with the Blowout Contingency Plan (the well has been out of control for 27 hours; why doesn't well control equipment arrive with the specialists?); (3) add the arrival of well control equipment and the start of well control operations to the timeline.

*RFAI: Provide clarifications to items 1 thru 3 in the above paragraph.*

**Table 1.6 - 34 (Response Timeline - Summer Scenario)**

The response timeline warrants reconsideration, including: (1) explain why the overflight for the Incident Commander and agency representatives arrives at Kenai (and from where), and why this takes 1.5 hours; (2) consider establishing the Unified Command prior to the +8 hours specified; (3) add the arrival of well control equipment and start of well control operations to the timeline, and (4) explain activities between hour 27 (when specialized equipment for well capping is just being ordered) and day 15 (when well is successfully capped).

*RFAI: Provide the clarifications to items 1 thru 4 in the above paragraph.*

## **1.8 Facility Description**

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

This section refers to containment points 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 wait for the oil to show up, 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.

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Rather than having planned containment points well outside the area likely to be affected, and the cursory acknowledgement that other containment points will be used if appropriate, the plan should focus on containment that is most likely to capture the oil *before* it has a chance to spread and anticipate reacting accordingly (with containment points farther from the well) if warranted.

*RFAI: Cook Inlet RCAC requests further clarification of the strategy to locate containment points 2-5 outside of the 6,000-ft radius since the document emphasizes that most of the plume will land well within the 6,000-ft radius.*

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

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.*

#### **1.8.C.7 Relief Well Considerations**

Relief Well Drilling Rig: when referring to equipment necessary to disassemble/reassemble the 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 for 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. Planholder should also specify why they would not use resources located in Homer for this Homer-area site.*

### **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 GRSs for their West Eagle location or to facilitate a work group for the development of applicable GRS for inland 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.*