



Comments and Requests for Additional Information

Regarding

Hilcorp Alaska

Cook Inlet Exploration

Oil Discharge Prevention and Contingency Plan, Major Amendment

Submitted

By

COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL

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General Comments

The Cook Inlet Regional Citizens Advisory Council (Cook Inlet RCAC) provides these comments and requests for additional information on the major amendment proposed for the Hilcorp Alaska (HAK) Cook Inlet Exploration Oil Discharge Prevention and Contingency Plan (C-plan).

The critical information for a new site are: (1) the description of the resources that may be impacted by an oil spill from operations at that location, (2) the logistical considerations specific to that location, and (3) response scenarios that indicate effective deployment of resources to meet the response planning standard. Overall, the plan amendment provides most of the appropriate and necessary details associated with 16 additional exploration sites stretching 34 miles along the eastern side of Cook Inlet. Cook Inlet RCAC's overarching concerns are that: (1) some of the descriptions of the anticipated oil trajectories indicate that Cook Inlet waters (and associated resources) will not be affected when we see that they may be, and (2) the scenarios lack clear timelines, making it impossible to determine whether they are adequate to meet the response planning standard (which is based on both time and amount recovered).

Improving both basic text and figure quality will further enhance the clarity and functionality of the plan. There are minor typographical errors throughout the C-plan amendment and some of the figures depicting the locations are very dark and difficult to read. (For example, see Figure A-15: 33-1 Location and Drainage Map. See also the reference to Figure B-121 under the GO-01 Exploration Well Environmental Considerations, which should be B-21.)

Appendix A - Site Specific Information

Susan Dionne Exploration Well Environmental Considerations

Estimate of Planning Standard to Reach Open Water

Regarding the potential for oil to reach open water, we agree that oil could potentially reach Cook Inlet marine waters in the event of a summer blowout. However, we also believe oil could reach Cook Inlet in a winter blowout because the possible plume trajectory (Figure B-18) immediately parallels the shoreline along a bluff. (This would also reconcile this section with the winter response scenario, which indicates that oil would reach Cook Inlet from this site; see below.)

RFAI: Cook Inlet RCAC recommends that the language be changed to indicate that oil from a blowout could reach Cook Inlet waters in both summer and winter.

Cannery Loop Unit Exploration Well Sites

Three Geographic Response Strategies (GRS) are listed for CLU-01 as being in the proximity of the site and potential spill trajectory. However, while it is acceptable to anticipate implementing the East Forelands GRS (approximately 13 miles north of the pad), the Clam Gulch GRS should be added because it is approximately 6 miles south. This is likely to be the predominate direction in which oil reaching Cook Inlet would move.

RFAI: Cook Inlet RCAC requests that the Clam Gulch GRS be added to this section.

The CLU-01 and CLU-03 sites are located near many residential properties, which will necessitate safeguards for residents in the event of a blowout.

RFAI: Cook Inlet RCAC requests that information be added about how local residents will be safeguarded during a potential blowout at these locations.

The environmental information for CLU-03 states that set-net fishing sites could be impacted by a blowout at that location.

RFAI: Cook Inlet RCAC requests that information be verified about the location of set-net fishing sites.

Kenai Unit Sites

The 41-7, 33-1, 14-6, 34-13, and 33-30 sites should include the Clam Gulch GRS, as it is approximately 6 miles south of the Kasilof River and is the likely direction of any oil deposited into the Inlet.

RFAI: Cook Inlet RCAC requests that the Clam Gulch GRS be added to this section.

The 33-1 and 33-30 sites are located near many residential properties, which will necessitate safeguards for residents in the event of a blowout.

RFAI: Cook Inlet RCAC requests that information be added about how local residents will be safeguarded during a potential blowout at these locations.

Regarding the potential routes of discharge for the 34-13 site, the language indicates that oil would be unlikely to flow directly to streams. However, Figure A-17, which does not indicate flow direction, does show a stream approximately 600 ft. from the pad.

RFAI: Cook Inlet RCAC requests that the planholder verify potential flow direction and the likelihood of oil reaching the stream noted on the map.

Appendix B

The figures provided appear to show the sites as they are today, but do not show what they would look like during drilling activity. For example, there are no evacuation routes or muster areas. However, the pale colors and extremely small font make it difficult to read the figures clearly.

RFAI: Cook Inlet RCAC requests that the planholder improve the site plans to ensure that they are clear and readable, and show key features related to the future use (such as evacuation routes and muster areas.)

Part 1

1.2.2 External Notification (Table 1-2, Spill Reporting Matrix)

While there is no requirement to include Cook Inlet RCAC on the list of entities to be notified of a spill; notification would facilitate the RCAC's ability to activate personnel as needed to monitor response activities. It's also essential for Cook Inlet RCAC to notify potentially affected stakeholders.

RFAI: Cook Inlet RCAC requests that it be added to the Spill Reporting Matrix list using the same criteria as NRC notification.

Response Scenarios - General

As noted previously, the response scenarios do not include clear timelines for response actions, as required by 18 AAC 75.425(e)(1)(F). This information is not only required by regulation, but is critical to ensure that the scenarios serve their intended purpose of indicating how the planholder would mount an effective and timely response to meet the planning standard.

RFAI: Cook Inlet RCAC requests that clear timelines for response actions be added to all scenarios.

Only one winter blowout scenario is included. The purpose of winter blowout scenarios is to identify the response actions that would be taken in very different conditions from summer, including challenges to accessibility (both by land and water), darkness, and cold.

RFAI: Cook Inlet RCAC requests that response scenarios for winter be added for the CLU-3 and 41-7 locations (currently Scenarios 4 and 5, respectively).

The **Cook Inlet Response Tool** (available at www.aos.org) would be a useful tool for the response scenarios. It is a multi-layered GIS tool with high-resolution video of, and detailed data about, the Cook Inlet shoreline.

RFAI: Cook Inlet RCAC suggests that the use of the Cook Inlet Response Tool be added to the response plan.

Scenario 2: Susan Dionne Exploration Well Blowout Scenario (Winter)

Table 1-6 (Trajectory)

This section states that oil would fall on Cook Inlet in Table 1-6, but then states that oil would *not* reach Cook Inlet. Cook Inlet waters are approximately 1000 ft. from the pad site, as shown in Figure A-5.

RFAI: Cook Inlet RCAC requests that clarification be added to this section (and the related Environmental Consideration, above) to clarify whether oil would be deposited on Cook Inlet in winter.

Table 1-7 (Surveillance and Tracking)

Aircraft and marine vessels are common tools for observing the movement of oil spilled to water, which provides the best information to inform response strategies. These resources are not mentioned; instead, there is reference on “direct visual observation” on land.

RFAI: Cook Inlet RCAC requests clarification about how “direct visual observation” will be implemented on land, and how oil reaching Cook Inlet will be tracked.

Table 1-7 (Spill Recovery Procedures)

TF-3 (passive sheen recovery) is referenced as being used to collect accumulated oil at the booming locations. Adding nearshore or modified open water tactics would add to the effectiveness of this task. Passive sheen recovery is intended to clean shoreline areas using the rise and fall of the tide to allow oil to encounter snare boom or viscous sweep. Shoreline tactics, CI-SL-5 and CI-SL-6 which use sorbents and snares to collect oil in the shore zone and keep it from moving into the water, would likely be more effective. Since this scenario takes place in the winter CI-SL-7 may prove to be needed due to the possible presence of beach ice.

RFAI: Cook Inlet RCAC suggests that the tactics be reconsidered. This is important information to ensure that the necessary equipment and other resources are available.

Scenario 3: Susan Dionne Exploration Well Blowout Scenario (Summer)

Table 1-12 (General)

This scenario takes place on July 5, but does not acknowledge that July is generally the beginning of the annual salmon migration. A blowout for 15-days would have significant impact on the commercial and sport fisheries and should be acknowledged, along with any

measures that would be taken to alert and ensure the safety of the large number of people involved in these important fisheries.

RFAI: Cook Inlet RCAC requests that the planholder acknowledge that this scenario would occur during critical salmon fishery activity and describe related activities.

Table 1-12 (Spill Containment and Control)

Similar to the previous comment, the addition of nearshore, modified open water, and/or open water tactics would strengthen the effectiveness of the response to recover oil before it reaches the shoreline.

RFAI: Cook Inlet RCAC suggests that the tactics be reconsidered. This is important information to ensure that the necessary equipment and other resources are available.

Scenario 4: CLU-3 Exploration Well Blowout (Summer) and Scenario 5: 41-7 Exploration Well Blowout (Summer)

Comments on these scenarios are combined, as the scenarios are nearly identical.

Tables 1-16 and 1-22 (General)

These scenarios also take place during the salmon fisheries in the area.

RFAI: Cook Inlet RCAC requests that the planholder acknowledge that these scenarios would occur during critical salmon fishery activity and describe related activities.

Tables 1-17 and 1-22 (Surveillance and Tracking)

The plan states that oil spill tracking data will be used, but does not identify what data will be used and how it will be obtained.

RFAI: Cook Inlet RCAC requests that information be added to explain how surveillance and tracking will be implemented, including the data and methods that will be used.

Tables 1-17 (Environmentally Sensitive Areas)

This section references a GRS (CCI-07) but does not list the specific inland tactics that are referenced in the GRS such as deflection/diversion booming CI-IL-5.

RFAI: Cook Inlet RCAC requests that the tactics included in the GRS be referenced here and added to the list of CISPRI tactics in Table 1-18.

Table 1-17 (Spill Containment and Control)

This section does not list all the tactics that could be used for an effective response on land, given the variations in terrain, nearby businesses and residences, and drainages. While the Kenai River GRS (CCI-07) provides a good starting point, it was not designed to address a spill coming from this location. The development of a site-specific GRS is warranted in this case, due to the proximity of the pad to the Kenai River.

RFAI: Cook Inlet RCAC suggests that a new GRS be created for this site based on a new site survey of the area.

Section 1.7 Non-mechanical Response Options

This section states that in situ burning may be used offshore, but the scenarios (Tables 1-12, 1-17, and 1-22) reference in situ burning of vegetation in the Shoreline Cleanup Plans.

RFAI: Cook Inlet RCAC suggests including the use of in situ burning of oiled vegetation as needed to this section.