"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."

June 23, 2014

Diane Munson
Industry Preparedness Program
Alaska Department of Environmental Conservation
555 Cordova Street
Anchorage, AK 99501

SUBJECT: Comments on Blue Crest Alaska Operations, LLC, Oil Discharge Prevention and Contingency Plan, (ODPCP or C-plan) for Cook Inlet Offshore Exploratory Drilling Program (Plan No. 14-CP-5226)

Dear Ms Munson:

Cook Inlet Regional Citizens Advisory Council (Cook Inlet RCAC) submits the attached comments, recommendations, and Requests for Additional Information (RFAI) on the Blue Crest Alaska Operations (BCAO), LLC, ODPCP, for Cook Inlet Offshore Exploratory Drilling Program on behalf of our member entities. The mission of the Cook Inlet RCAC is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and oil facility operations in Cook Inlet.

Cook Inlet RCAC appreciates BCAO's efforts to comply with oil spill prevention and response regulations in Cook Inlet and offer the following recommendations. Overall, the plan addresses the necessary information required in regulations and incorporates CISPRI's Technical Manual well. Our comments emphasize the need to further clarify issues related to the monitoring of ice conditions and the criteria that will be used to determine whether operations extend past October 31 in any given year. We also would welcome a better understanding of BCAO's approach to handling harsh weather conditions with their scenarios and in discussion of both realistic maximum response operating limits and deployment in adverse conditions. Finally, the plan would benefit from an additional edit and updating of web links and some documents referenced. We have tried to identify a few examples to support the efforts of ADEC and the planholder in this regard.

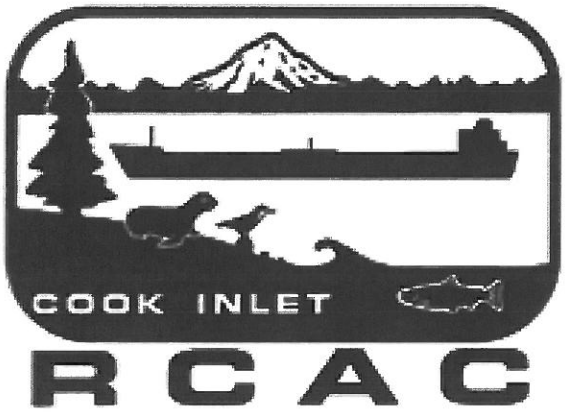
Cook Inlet RCAC requests a findings document to be supplied at the end of this plan review.

As always, 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: Betty Schorr
Graham Wood
John Martineck



Comments and Requests for Additional Information

Regarding

BlueCrest Alaska Operating LLC
Cook Inlet, Alaska Exploration Program
Oil Discharge Prevention and Contingency Plan

Submitted by
Cook Inlet Regional Citizens Advisory Council

June 23, 2014

Introduction

The BlueCrest Alaska Operating LLC (BCAO) Cook Inlet Exploratory Drilling Program Oil Discharge Prevention and Contingency Plan (ODPCP or C-plan) describes the company's contingency planning for its upcoming exploratory drilling activities in Cook Inlet. Cook Inlet Regional Citizens Advisory Council's (RCAC) requests for additional information (RFAI) seek to highlight the issue of sea ice, general acknowledgement of the potential for adverse weather conditions even in the spring, summer, and fall in Cook Inlet, the role of the RCAC, and the need for minor revisions for clarity. We provide General Comments below, followed by more specific comments on the plan sections.

General Comments

Sea Ice

The Introduction to the plan describes BCAO's consideration of the potential impacts of sea ice on its operations, and plans to mitigate any such impacts. BCAO states that exploratory drilling operations will begin in early April and run through October 31 in any given year. BCAO will not drill ahead into hydrocarbon-bearing formations or proceed with well testing and logging after October 31st of any year without ADEC concurrence. At this point, depending on progress made, BCAO may plug and abandon, complete, or suspend any wells drilled either permanently or until the next ice-free season.

RFAI: Cook Inlet RCAC requests that the planholder identify the criteria that would be used to trigger a request to continue operations past October 31, and what conditions would then trigger an end to extended operations. The criteria ADEC would use to approve or deny a request for extended operations should be identified in advance as well. Finally, please specify how long it would take to relocate the rig to southern Cook Inlet.

BCAO identifies several sources of information that will be used to determine whether ice is likely to form in, or move through, the prospects, including both Ice Observers (starting as early as October 15 if warranted by current or forecasted conditions) and a monitoring device to provide ambient temperature readings at the site. BCAO indicates that it will coordinate with ADEC and AOGCC to determine the best product to forecasting weather and monitor ambient air temperature.

RFAI: Cook Inlet RCAC recommends that the planholder clarify whether other ice detection technologies have been considered, such as ice radar. We further suggest that the National Weather Service should be consulted for advice on appropriate measurement devices for temperature or other weather conditions in addition to AOGCC and ADEC.

Consideration of Bad Weather Conditions

The planholder proposed a strategy to avoid impacts of ice, and therefore the darkness and storms typical of the winter season in Cook Inlet. However, they do not sufficiently acknowledge the potential for bad weather during their proposed May – October exploration season. Fog, icing, or high sea state could delay deployment of response resources and should be acknowledged in Section 1.5, as required in 18 AAC 75.445(c) and 18 AAC 75.425(e)(1)(E). Section 3.4 describes

realistic maximum response operating limits (RMROL) and references CISPRI's Technical Manual, Appendix B. However, this section should identify specific response limits that could hamper or preclude response operations, and the frequency with which these may be expected during the months of exploration activity as required at 18 AAC 75.425(e)(3)(D); the potential for snow should not be dismissed out-of-hand. Finally, the scenarios all describe calm conditions in mid-summer. Regulations at 18 AAC 75.445(d)(5) require that the planholder use scenarios to demonstrate the ability to meet the response planning standard (RPS) under environmental conditions that could be expected; while clear calm, summer days can be expected, so can storms, high seas, and reduced visibility due to fog or precipitation. (Some of the information in Section 2.4 could be added to the RMROL section.)

RFAI: Cook Inlet RCAC requests that the sections mentioned above be enhanced to more specifically acknowledge the potential for harsh weather conditions. While we are pleased that this new operator in the region plans to use CISPRI's excellent resources and local knowledge, the role of this plan is to demonstrate the operator's planning assumptions and preparation for operations in Cook Inlet.

Cook Inlet RCAC's Role

The Oil Pollution Act of 1990 established two Regional Citizens Advisory Councils in Alaska. Traditionally, Cook Inlet RCAC has participated within the Incident Command System (ICS) structure to provide advice and recommendations to the Incident Commander, Operations Sections, Environmental Section, and the Public Information Officer, as recognized according to the Alaska Unified Plan Appendix II, Section 4.

We request that Cook Inlet RCAC be included in the notification list. We request that this section include a description of the RCAC's role in the ICS structure.

Improving Plan Clarity and General Quality

In several places, we found minor changes that would improve plan clarity and readability (as required in 18 AAC 75.425). In some cases, there appear to be simple mistakes that could create confusion or represent discrepancies among the different sections. For example, (1) the mention of Part 5 in the Executive Summary cites the wrong regulatory reference for the response planning standard used; (2) Table 1.6.15.1-1 lists CISPRI twice related to overflights, indicating that others may be able to participate; (3) Table 1.6.15.1-2 summarizes the ICS structure but omits a Finance Section; (4) Facility diagrams in Section 1.8 are cramped and hard to read. Improved formatting would enhance their use for the identification of key shutoffs, bilge slops, oily wastes and other critical prevention equipment; and (5) Table 2.4-1 states that drilling or service operations will be discontinued when air temperature reaches -14F degrees or "above" when we assume this should read "below."

Use of Most Current Information

Some documents or resources mentioned in the plan should be updated, including: (1) the NRC webpage (mentioned in Section 1.2.5), which had been taken down (as of the review date of this plan) and should be replaced by the phone number; (2) the link to the GRS website mentioned in Section 1.6.6; (3) reference in Section 1.6.6. to the Cook Inlet Oil Spill Model (not longer in use and under review for update or replacement); and (4) reference to the 2006 *U.S. Coast Guard Incident Management Handbook* in Section 3.3.2 (recently updated). Additionally, we suggest updating the

contact for the Bureau of Safety and Environmental Enforcement office in Anchorage as David Moore no longer works there.

1.0 Response Action Plan

1.1.1 BCAO Response Notification Flowchart Diagram

The diagram indicates that the National Response Center, Alaska Department of Environmental Conservation and/or U.S. Coast Guard would be notified by Witt/O'Brien's (the IMT), but the Introduction section indicates that the IMT would only be activated for Level II or III spills. Level I spills may also warrant notification of the appropriate state or federal entity in order to comply with reporting requirements. (Section 1.2.2 states that the ERT would determine what notifications are needed, but this should be clarified and consistent among the sections of the plan.) Regulations at 18 AAC 75.425 (1)(B)(i) require that the person making those notifications be identified, and those at 18 AAC75.300(b) describe the circumstances under which spills must be reported to the State.

RFAI: Cook Inlet RCAC requests clarification of what would trigger agency notification in the event of a Level I spill or other minor spill. Please also identify the name, title, and telephone number of the individual who will make the notifications.

1.2 Reporting and Notification

1.2.2 Response levels

This section describes three spill levels, which, in turn, would be used to determine the external response resources that would be activated. (As noted in the Executive Summary, these levels would be used to determine whether the IMT needs to be activated, for example). As the levels are essentially defined by the extent of resources brought in, it would be helpful to identify other metrics or benchmarks that would be used to guide responders in determining the extent of resources needed based on spill size, whether it has been controlled, the potential for release to water, etc.

RFAI: Cook Inlet RCAC suggests that the spill levels be defined based on metrics related to the size or potential consequences of the spill. In this way, the spill levels can be used to trigger the activation of external resources, as suggested in the Executive Summary.

1.5 Deployment Strategies

1.5.3 Transportation to Spill Site

This section states that transportation options are presented in the CISPRI Technical Manual, Tactics CI-LP-1 to CI-LP-6. The CISPRI TM logistics and planning section discusses transportation options only in sections CI-LP-1, CI-LP-3, CI-LP-4, and CI-LP-5. It also references Transportation Alternative; Air-Access section references the Cook Inlet Sub-Area Plan, Part 3.

RFAI: Cook Inlet RCAC suggests clarifying how CI-LP-2 and CI-LP-6 fit into transportation options and clarifying the Transportation Alternative; Air –Access Cook Inlet Sub-Area plan reference.

1.6 Response Scenarios and Strategies

Recovered Oil Transfer and Storage

This section references the use of open-hopper barges to store oiled debris.

RFAI: Cook Inlet RCAC requests clarification of the origin of open-hopper barges. We encourage consideration of the use of ore bins instead, as described in the Temporary Storage and Ultimate Disposal section.

Table 1.6.15.1-4
Response Timeline

The table below identifies several clarifications and recommendations related to the summer blowout response scenario. These recommendations are based on the regulatory requirement at 18 AAC 75.425(e)(1)(F) that the scenario must demonstrate the ability to meet the response planning standard (which includes ensuring that primary and secondary storage, waste management, and crewing resources are appropriately aligned with containment, skimming, and vessel resources). Recommendations below also come from the requirement at 18 AAC 75.445(d)(4) regarding the protection of environmentally sensitive areas.

Table 1. Recommendations and requests for clarifications related to Summer Blowout Scenario based on Table 1.6.15.1-4

Statement from Plan	**Recommendations and Requests for Clarification**
Hour 0 references a Class 8 towing vessel (Tug) is mobilized to support the recovered fuel lightering operations.	*Clarify if this vessel is to be used to fuel operational vessels; otherwise clarify what the recovered product is.*
Hour +1.5: An emergency response plan is developed to provide cleanup capability according to listed priorities. The priorities listed do not include personnel safety or protection of environmentally sensitive areas.	*Clarify that this is referring to an Incident Action Plan (IAP), and that safety and environmentally sensitive areas – particularly those for which Geographic Response Strategies have been developed - are priorities.*
Hour +3.5 and +4.5: The CISPRI OSRV #2 arrives on scene and maintains standby status. Vessels in active response operations may from time to time be in "Standby" status; large assets deployed early in a large response action should have a job assignment when they arrive on-scene and begin deploying the assigned equipment package.	*Recommend better utilization of assets by putting them to work upon arrival on scene.*
Hour +5.5: CISPRI M/V #2 is designated safety vessel.	*Clarify if CISPRI M/V #2 is replacing CISPRI M/V #4 or what extent it will operate as safety vessel.*
Hour +8: CISPRI M/V #2 will remain on standby.	*Clarify when CISPRI M/V #2 was removed from service as safety vessel.*
Hour +12: Class 8 vessel (tug) arrives on scene with CISPRI Barge #1; however, Hour 0 indicated that the Class 8 (tug) ETA at Nikiski to *collect* the barge would be Hour +12. There	*Clarify when Class 8 (tug) arrived and when departed with CISPRI Barge #1, then with CISPRI Barge#2.*

Statement from Plan	Recommendations and Requests for Clarification
seems to be no time allotted to make up the tow and get the CISPRI Barge #1 underway and on-scene. The same circumstances seem to repeat at Hour +16.	
Hour +13-36: Oil recovery and lightering to the CISPRI Barge#1 will continue.	*RFAI: Please clarify how crew changes and vessel fueling and the needed transit times will affect oil recovery and vessels on scene.*

2.0 Prevention Plan

2.2.1 Recent Cook Inlet Navigable Waters Oil Spill History

While this section lists oil spills in Cook Inlet from 1987-2009, it does not list spills from the *Endeavour - Spirit Of Independence* rig during its previous operations in the area. These spills should be added as they are directly relevant to understanding spill risks associated with the rig that will be used and therefore directly applicable under 18 AAC 75.425(e)(2)(B).

RFAI: Cook Inlet RCAC requests that this section include spills associated with the Endeavour while engaged in Cook Inlet (May, July, August, and September 2013).

2.4 Conditions That Increase Discharge Risk

This section focuses heavily on the impact of weather conditions on spill response (which could be used to bolster the RMROL section significantly), but is intended in 18 AAC 75.425(e)(2)(D)(i) and (ii) to discuss conditions that may increase the risk of a discharge occurring in the first place. These may include weather, but should focus on the potential for discharge, not impacts to the response.

RFAI: Cook Inlet RCAC requests that the planholder clarify conditions that may increase the likelihood of discharge.

3.0 Supplemental Information

This section would benefit from the addition of a reference to the Cook Inlet Response Tool, an online resource developed by the Alaska Ocean Observing System, Cook Inlet RCAC, and National Oceanic and Atmospheric Administration found at: http://data.aoos.org/maps/search/cirt.php. This resource provides a combination of GIS spatial data layers, ShoreZone video and imagery, and current and forecasted conditions.

RFAI: Cook Inlet RCAC recommends including the Cook Inlet Response Tool and short explanation of its attributes.