



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**

May 19, 2020

General Comments

The Seasonal Drilling Restrictions placed on BlueCrest Alaska Operating (BCAO) in the November 13, 2015 plan approval letter, issued by the State of Alaska, cites April 15th and October 31st as dates that bracket the drilling season based on an 18-year NOAA study. In order to reduce the risk of an oil discharge and to ensure the effectiveness of planned spill response methods prior to periods when planned response methods are rendered ineffective by environmental limitations, the Alaska Department of Environmental Conservation (ADEC) directs BCAO to complete drilling operations (for the BlueCrest Off-shore exploration wells) into hydrocarbon-bearing formations by October 31st of each drilling season that the plan approval is in effect. However, the seasonal drilling restrictions do not specify when exploration operations should cease and the MODU will be moved from drilling locations, i.e. drilling into hydrocarbon-bearing formations must be completed by October 31st. But this directive is not clear as to when all operations must cease and the MODU depart the location. As the directive stands, drilling may continue until October 31st with no indication as to when drilled wells will be capped or plugged and abandoned and the MODU's operations completed and the rig moved from the drilling location.

RFAI: Please clarify when drilling operations must be completed and the MODU moved from the drilling location.

The Cook Inlet Spill Prevention and Response Inc. (CISPRI) Technical Manual (CTM) is referenced throughout the plan.

RFAI: Please include links to the CTM wherever a CTM section is referenced.

Since the CTM is referenced heavily in this plan and other Cook Inlet ODPCP's, and that the ADEC has stated that the CTM may be reviewed anytime an ODPCP that references the CTM is in review, CIRCAC has incorporated requests for clarification and/or recommendations for revisions, edits, changes or amendments to the CTM.

This plan includes the terms "MODU" and "jackup rig" almost equally to describe the Spartan 151 and associates the two in Section E.2.1.8.

RFAI: For clarity and consistency, recommend using a single term that will be readily recognized by State and Federal regulatory agencies throughout the plan.

Introduction

The following statement is included within the second paragraph of this section: "Since the Mobile Offshore Drilling Unit (MODU) included in the plan is a mobile asset that may be useful to northern Cook Inlet leaseholders, the hypothetical circumstance of a drill site is included to facilitate the possibility of future activity in that area. Any new exploration locations will be amended to the plan in site-specific appendices."

CIRCAC recommends that any future amendments adding new lease sites and/or facility operations should be considered as a major amendment requiring public review of the amendment in comparison with the entire plan; not an amended text only review.

The fourth paragraph states, “Each year, drilling operations are planned to continue through the open water season when open pack ice conditions are less than 10% concentration. Initiation of operations will begin in April and run through October 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 Alaska Department of Environmental Conservation (ADEC) concurrence. Dependent upon satisfactory progress, BCAO may plug and abandon (P&A), complete, or suspend operations in early November. If ADEC approval is requested to continue drilling or well testing operations beyond the 31st of October, BCAO would consult with several sources of information on sea ice development that include the following:...”

RFAI: Please clarify if the MODU's legs can endure an encounter with 10% ice coverage flowing at 4 knots. Specify what the complete shutdown procedure will be if ice encounters the MODU while drilling, well testing and logging.

National Weather Service

“The Anchorage National Oceanic and Atmospheric Administration (NOAA) National Weather Service (NWS) office provides reliable information for marine forecast as well as sea ice analysis and forecast. NWS would be BCAO’s primary source of information for marine forecasts, which may be accessed via the following website:
<http://pafc.arh.noaa.gov/marfctst.php>.”

“The NWS is preparing a study of ice development in Cook Inlet based on air and water temperatures at Kenai and Anchorage. From the study, they plan on developing a temperature-based ice forecasting tool for ice development.”

RFAI: Please verify with the NWS, if the Cook Inlet ice development study is in progress or completed.

Ice Observers

This section contains the following statements regarding ice observation and air temperature monitoring in association with drilling activities and should be clarified:

“BCAO will initiate ice observation from onboard the rig and may monitor ice development at the site as early as October 15th dependent on weather conditions.”

“Aerial observations of ice formation will also be gathered when reports from NWS indicates ice conditions increasing to a level that may impede CISPRI response to a spill. BCAO may coordinate with the NWS to perform overflights with trained ice observers. This would be completed in tandem with monitoring of ambient temperatures and consultation with the NWS.”

RFAI: Please clarify in what capacity NWS will participate in overflights. Also, please provide details of Ice Observer training for BCOA personnel. Please clarify the language regarding when Ice Observers will be used.

“A monitoring device will be established on the rig to provide for constant ambient air temperature readings. BCAO will coordinate with ADEC and the Alaska Oil and Gas Conservation Commission (AOGCC) to determine the best product to forecast weather and monitor ambient air temperature.”

RFAI: Please clarify how the ADEC and AOGCC will determine BAT to forecast the weather. Recommend coordinating with the NWS to determine BAT for weather forecasting and ambient air temperature monitoring products.

OBJECTIVES

The descriptions of spill level II and III are somewhat confusing, likewise they do not specify a spill amount to identify the correct response level.

RFAI: Recommend 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.

Updating Procedures

This section references plan review and updates as necessary when major changes occur. However, none of the key factors listed denote a major amendment requiring review.

RFAI: Please identify those factors consistent with 18 AAC 75 that would constitute a major amendment, requiring public review.

EXECUTIVE SUMMARY

The first paragraph of the executive summary states, “This ODPCP is to be followed by the employees and contractors working at offshore exploration sites in Cook Inlet under BCAO. The ODPCP discusses discharge prevention measures as well as step-by-step procedures to follow from the time a discharge is detected through site closure and disposition of recovered oil.”

RFAI: Please clarify within the context of the Executive Summary, how this plan covers the Cosmopolitan site drilling operations in southern Cook Inlet.

1.0 Response Action Plan

Figure 1.1-1 BCAO Response Notification Flowchart Diagram

Even though this plan contains an Acronyms and Abbreviations section, this figure lists multiple acronyms that do not have a written definition the first time it is used, as is customary and immediately helpful to the reader.

RFAI: Please update this diagram by spelling out all acronyms and update the Acronyms and Abbreviations section as appropriate.

1.1 Emergency Action Checklist

1.1.1 Guidance on Immediate Response Checklist and Notification Steps

This subsection and other parts of section 1 indicate that the onboard member of the ERT is to be notified of even minor spills but the plan does not identify any ERT members. While this information may be known internally, or be contained in other BCAO documents, the plan itself does not identify ERT members by title, although some may be listed by name under a different title elsewhere in sections 1.1 or 1.2.

RFAI: Please identify Emergency Response Team (ERT) members either in a dedicated table or an existing table within this section.

Table 1.1-1 BCAO Spill Response Checklist for Oil and Hazardous Materials

This table does not contain immediate response actions. Instead it contains a list of questions that only require a yes or no answer and many are not “action oriented”.

RFAI: Please update this checklist to include action-oriented “steps” that must be taken as required in 18 AAC 75.425(e)(1)(A).

1.2 REPORTING AND NOTIFICATION

Neither section 1.1 (Table 1.1-1) or 1.2 includes specific immediate response actions to be taken even though Section 1.2.1 indicates that, “This section describes the immediate spill reporting actions and notification process to be taken at any time.”

RFAI: Please update this section to include specific immediate response actions to be taken by personnel in the event of a spill or threat of a spill as required by 18 AAC 75.425(e)(1)(B).

This section attempts to describe minor and major response levels; however, there are no spill volumes cited, e.g. <10,000 gallons (240 bbls) = minor, >100,000 gallons (2400 bbls) = major. Likewise, using the terms “minor” and “major” to describe spill size and not equating it with volumes set down in Federal oil spill size classification could lead to confusion upon reporting and in spill documentation.

RFAI: Recommend assigning a spill volume amount commensurate with State reportable quantities and spill size classification commensurate with federal standards to avoid confusion when documenting spills size.

1.2.4 Notification Sequence

This section uses the term “On-site company representative” and “Company Man” as interchangeable terms. Additionally, the “Company Man” is identified by title only as the individual who should receive initial notification of a spill, potentially act as IC for Level I, II, and III spills (Section 1.2.4), and, “direct initial spill response activities on the rig” (Section 1.5.1), yet a BCAO individual has not been identified anywhere in the plan to fill this role (Table 1.2-1).

RFAI: Recommend identifying who within the company is expected to fulfill “Company Man” role and clarifying that the terms “Company Man” and “On-site company representative” are interchangeable (as done in the first bullet, using only one term that is readily recognizable to plan users throughout the remainder of the plan to avoid confusion.

Additionally, there doesn't seem to be a well-defined directive for initial incident command; e.g., "The BCAO On-Site Company Representative ("Company Man") will act as the Initial IC for minor and possibly Level I spills and may act as Initial IC in Level II/III incidents. The BCAO Company Man will report spills and incidents to the BCAO QI, who will contact the (MRM) Command Center, if needed, and shall initially direct emergency response activities for oil discharges."

RFAI: Please clarify which individual will direct initial response activities, when and how that would change, and the circumstances to trigger the change. This should be spelled out in a way so that there is no question as to who oversees initial response activities and when that leadership role will change.

Table 1.2-1 Initial Spill Response Team / Emergency Contacts

This table lists Geoffrey Merrell as the alternate IC. However, Figure 1.2-1 Incident Command System Organizational Structure, lists him as the Safety Officer and the Executive Summary lists him as the QI.

RFAI: Please clarify which position Geoffrey Merrell will fill and if he is assigned or acting in a different role, indicate who will fill his previous role.

Additionally, the table lists very few initial spill response team members specifically by name or position.

RFAI: Please clarify who from BCAO or the position of the BCAO personnel to fill specific team member positions.

Table 1.2-4 External Notification List – Local and Tribal Contacts

Lists Mobil LNG (Liquid Natural Gas) Terminal.

RFAI: Please verify ownership and location of LNG Terminal.

ADEC Initial, Interim, and Final Reports

ADEC 18 AAC 75.300 requires notification to ADEC of any hazardous material spill to state lands or waterways or any oil spill (greater than 1 gal) to state lands or any oil spill to waterways. However, Table 1.2-3 External Notification List - State Contacts does not reflect the same reportable quantity.

RFAI: Please update Table 1.2-3 to include the proper reportable quantity as required by 18 AAC 75.300.

1.2.6 BCAO Command Center

This section indicates that, "With the exception of minor spills, BCAO will use the CISPRI Command Center in Nikiski." However, section 1.2.4 states that the "BCAO Company Man will report spills and incidents to the BCAO QI, who will contact the (MRM) Command Center, if needed, and shall initially direct emergency response activities for oil discharges."

RFAI: Please clarify which Command Center will be used and when.

1.3 Safety

1.3.3 Personal Protective Equipment

This section only refers to the available CTM site-specific safety plan (SSP) template and does not lay out steps for creation of a SSP. Table 1.1-1 contains a question asking if an Initial Site Safety Plan has been activated & sent to Anchorage but provides no further guidance on who will create a SSP (using the CTM template).

RFAI: Recommend including a link to Appendix C of the CTM, in the absence of a sample template, to ensure quick access.

1.4 Communications

1.4.5 Communications Equipment Inventory

“Communications systems are briefly described in Table 1.4-1.” This section title indicates a communications equipment inventory, yet the table only describes the various types of communications available for use.

RFAI: Recommend changing the title to reflect the actual content. Likewise, changes should be made wherever Table 1.4-1 is referenced.

Rig Communications Systems

This sub-section of 1.4.5 indicates that, “Prior to drilling, BCAO will work with CISPRI and ADEC to ensure that VHF radios are on the same bandwidth and can communicate with CISPRI radios. This will be done prior to drilling operations.” This description does not provide enough detail to be considered “procedures” for establishing a solid communications plan prior to the commencement of drilling. Communications are especially critical when a spill is discovered or during the initial hours of a response and the identified spill communications network (as per CTM) is activated.

RFAI: Please provide more detail on the procedures for establishing field communications in accordance with 18 AAC 75.425(e)(1)(D).

Appendix E (E.1.4.5) is supposed to be the Communications Equipment inventory (radios) yet it does not indicate how many radios are available on the rig.

RFAI: Recommend updating E.1.4.5 with accurate quantities of radios to serve as an actual inventory.

1.5.5 Response Action Contractor Mobilization

MRM.

“Once notified, four to six persons from MRM will be flown to Nikiski or any other selected command post site via charter aircraft, commercial airline, or will drive from Anchorage as necessary and can arrive within 6 hours (half day) of the initial notification. Within 12 hours, personnel can be mobilized from an extensive out-of-region network by commercial airline to the selected command post in Nikiski (or another suitable location) as determined by the UC.”

RFAI: Please clarify the synonym MRM by including a written meaning followed by the synonym in parenthesis at the first time it is used in the plan.

RFAl: Please clarify initial manning of command post, whether the six-hour arrival time is for MRM to staff the EOC or the Command Center.

Likewise, this section indicates, “within 12 hours, personnel can be mobilized from an extensive out-of-region network.”

RFAl: Clarify how long before MRM personnel will be in the command center actively tending to response activities.

1.6 Response Strategies

This section contains two response scenarios. One scenario addresses an uncontrolled release on a well drilled from a MODU. The other scenario depicts a fuel transfer spill. Both scenarios are set as summer time (July) spills. BCAO states that drilling operations may continue in conditions of < 10% ice coverage. While ice coverage in the lower Cook Inlet is less probable in late fall, ice coverage of 10% or less is more probable at the Tyonek area in the upper Cook Inlet. Based on the idea that operations are going to continue when ice may be present, it should follow that inclusion of a winter scenario is appropriate to outline the differences in seasonal response actions, and demonstrate BCAO’s ability to effect these response actions under different seasonal conditions.

RFAl: Request the development and inclusion of a winter scenario to demonstrate adequate response actions for operations taking place when ice may be present.

1.6.2 Response Planning Standards Review

The response scenario and strategy both include a Major spill scenario for a surface well blowout at the BCAO well site during a summer drilling program based upon the Response Planning Standard (RPS) volume of 5,500 barrels of oil per day (bopd), a response strategy for a reduced RPS of 800 bopd at the Cosmopolitan locations, and a response strategy for an oil transfer failure between the drill rig and a fuel barge (17 bbl). However, BCAO has stated that they will continue drilling operations into the ice season with ice coverages of < 10%.

RFAl: Request a winter scenario that includes conditions with ice coverage of < 10%.

1.6.3 Procedures to Stop Discharge

This section discusses fuel transfer operations and cites the BCAO Fuel Oil and Fluid Transfer Manual. At the beginning of Section 1.6, 33 CFR 154.1035 is cited as the regulatory reference governing response plans for oil facilities. The plan incorporates federal regulatory standards and requirements. Sections throughout the plan cite various federal regulations applicable to each section. Since this plan is written to cover a shore-side facility and a Mobile Offshore Drilling Unit (MODU) that is also regulated as a vessel; those regulations applicable to both facility and vessel fuel transfer requirements should be considered and referenced.

RFAl: Recommend inclusion of Federal regulatory cite(s) applicable to vessel and facility written transfer procedures as references at the beginning of each applicable section within this ODPCP.

1.6.4 Fire Prevention and Control

This section references the MPC pump located in Anchorage and required the supervision of a T&T BISSO firefighting/salvage master. MPC does not appear in the Acronyms and Abbreviations for this plan.

RFAI: Recommend including the written description before the acronym (with the acronym in parenthesis) the first time used, as is customary.

1.6.5 Blowout Control and Well Control Procedures

The plan makes the assertions that “BCAO would also execute efforts to drill a relief well, including rig acquisition and mobilization, concurrent with the implementation of surface control techniques.”

RFAI: Since BCAO intends to use a MODU, please clarify which rig would be up to the task of drilling a relief well and the anticipated time needed to contract, transport, and place the MODU to drill a relief well.

Relief Well Timing

This section indicates that the drilling of the relief well could begin as soon as the rig-up was complete. Assuming the site is accessible (March through December only), the planned range of time for completing a relief well is 120 to 150 days, citing the following elements:

- Contract/mobilize a relief well rig: 60 to 75 days.

RFAI: Clarify how this timeline may be adjusted if a MODU is not located in Alaska.

- Set rig on site: 10 to 15 days

RFAI: Clarify if this pertains to setting a MODU.

- Drill relief well: 50 to 60 days

The times cited seem to be related to a conventional drilling rig.

RFAI: Clarify rig acquisition for a MODU and mobilization.

Discharge Tracking

This section discusses various methods to track spilled oil and cites the NOAA Guidelines for air overflights, on-water observations, and Shoreline Cleanup Assessment Team (SCAT) observation. However, this section does not discuss the possible use of Unmanned Aerial Vehicles (UAVs).

RFAI: Recommend including a discussion of the use of UAV's in spill tracking and SCAT surveys.

1.6.6 Protection of Sensitive Areas

The first paragraph of this section states, “Sensitive areas near the project are identified based on those presented in Section 9740.3, Geographic Response Strategies (GRS), in the Arctic and Western Alaska Area Contingency Plan, and in the CTM, Tactic CI-SA-2.”

RFAI: Recommend verifying location for GRS in the Arctic and Western Alaska Area Contingency Plan. Additionally, the CISPRI Technical Manual references the Cook Inlet Sub Area Plan and lists an incorrect web link to access GRS.

Paragraph five states, “A list of potentially impacted GRS’s has been prepared for the conditions most likely to occur at the proposed drilling locations. These lists have been prepared for conservative planning purposes for immediate mobilization and deployment to the sites where the Cook Inlet Oil Spill Model (CIOSM) has identified as potentially impacted if no response were to occur. As of June 2014, CIRCAC has advised that the CIOSM is no longer available on their website (<http://www.circac.org/>), as the program is under review for update and/or replacement.”

RFAI: Recommend removing references to the Cook Inlet Oil Spill Modeling tool from the plan as is pointed out further on in the text “As of June 2014, CIRCAC has advised that the CIOSM is no longer available on their website (<http://www.circac.org/>), as the program is under review for update and/or replacement.”

Table 1.6.15.1-1 RESPONSE SCENARIO – BCAA SUMMER BLOWOUT ASSUMPTIONS

The fourth sentence within this section states, “Site characterization results allow for safe response operations.”

RFAI: Recommend identifying HAZWOPER PPE level; i.e., Level B, C, or D.

FIRE PREVENTION AND CONTROL

This section indicates, “Although CISPRI personnel and resources are available to assist with shipboard firefighting efforts if they are not involved in spill response...”

Though CISPRI personnel may be able to support firefighting operations from shipboard, it is unclear in the CTM that shipboard firefighting is a tactic or strategy CISPRI provides or would assist. There are many differences between shipboard firefighting and supporting firefighting efforts from shipboard.

RFAI: Clarify CISPRI’s role in shipboard firefighting and supporting firefighting activities from shipboard; in this plan and the CTM.

SAFETY

The plan states, “The safety of response personnel is a primary concern. Air monitoring will be conducted and hot/cold zones created as necessary. Cold weather may be a concern, and consideration should be given to proper clothing and the potential for hypothermia. Reference CTM Appendix B ‘Realistic Maximum Response Operating Limits’ ”.

RFAI: Recommend including weather concerns for this (summer/July) scenario as heat may also be a concern.

DISCHARGE TRACKING:

“Trajectory modeling will be accomplished using CIOSM and confirmed by the use of tracking buoys and regular overflights.” As pointed out earlier in these comments the CIOSM is no longer supported by CIRCAC and is no longer available for use.

RFAl: Recommend removing this reference from the plan.

RECOVERED OIL TRANSFER AND STORAGE:

Oil will be initially collected and stored aboard the recovery vessels or associated storage barges and then transferred to a large storage barge (CISPRI Barge #1 or #2).

“A short-term temporary oil storage tank will be placed at the KPL Dock to receive recovered oily fluids from the barges. A longer-term temporary tank farm will be located on the uplands area of ASRC Rig Tenders Dock or a similar area in Nikiski (there are several potentially suitable sites in that immediate area).”

RFAl: Please clarify if BCAO has contractual, MOU, MOA or other agreements with ASRC and/or other area facilities for use of the facility as a temporary tank farm.

Table 1.6.15.1-2 BCAO Summer Blowout Response Timeline Response Activities – BCAO Spill Response Team - Day One

This table’s title indicates a timeline. However, the table appears to be a check list of activities with no indication of when these activities are to take place in the response.

RFAl: Please clarify when the listed activities are to take place throughout the response.

Table 1.6.15.1-4 BCAO Summer Blowout Response Timeline

This table references use of Immediate Response Team (IRT) members.

RFAl: Clarify BCAO’s participation level in the IRT program.

Table 1.6.15.1-4 BCAO Summer Blowout Response Timeline (Cont.)

At hour +2.0 the table shows CISPRI OSRV #2 arriving at OSK/ASRC to begin load out of personnel. However, an order activating OSRV #2 into service, as is done for other response vessels, cannot be located previously in the table. Notice of activation within the timeline allows for a fair evaluation of planning and command and control of response assets.

RFAl: Recommend adding activation for this large response platform to the table.

At hour +40 the table shows The Class 8 tug will take CISPRI Barge #1 undertow and proceed to Tesoro facility for lightering.

RFAl: Recommend using the most appropriate name/owner for the KPL facility.

Table 1.6.15.2-1 RESPONSE STRATEGY – Fuel Transfer Failure ASSUMPTIONS:

The assumptions made in this table include the statement that “Response focus will be on thick concentrations of diesel, with less emphasis on the leading edge or sheen.” Taking into consideration the natural fate and effects of oil on water and the tide and currents existing in Cook Inlet, it would be ineffective to chase “thick concentrations of diesel”, in a quickly spreading diesel fuel spill. It is more appropriate to attack the discharged fuel from the leading edge on the downstream side and collect it as it moves down on the current from sheen to thicker concentrations.

RFAI: Please clarify this assumption.

1.7 Non-Mechanical Response Options

While non-mechanical response options are required to be discussed and the guidelines for their use were intended to be provided in this plan to meet the requirements, it should be pointed out that the likelihood of implementation of either tactic is highly, if not absolutely, unlikely in upper Cook Inlet unless incidental (or accidental) ignition associated with an uncontrolled release (blowout conditions) occurred; in which case it would be impossible to follow the In Situ Burning (ISB) guidelines as intended.

1.7.2 Decision Criteria, Obtaining Permits and Approvals

This section discusses the use of ISB and dispersants. However, only a web link to the In Situ Burning Guidelines for Alaska (2008) is provided for access; <http://www.dec.alaska.gov/spar/ppr/regulation-guidance/manuals-guidance/>. However, the link provided does not work and appears to be incorrect.

RFAI: Please provide a working link to In Situ Burning and Dispersant guidelines.

1.8 Facility/Vessel Diagram (In APPENDIX E)

Response Equipment locations: Table 3.6-1 lists the onboard spill kit inventory and its (written) location on the rig, but the rig schematics do not display location(s) of this response equipment.

RFAI: Recommend updating the appropriate schematic (especially the schematics that will be posted on the rig for crew reference) or otherwise label locations of response equipment in accordance with 18 AAC 75.425(e)(1)(H).

2.0 Prevention Plan

2.1.10 Facility Piping Corrosion Control and Leak Detection Programs

Page 2.1-10 indicates that section 2.1.10 in Appendix E contains a description of the Spartan 151 Facility Piping Corrosions Control and Leak Detection Programs, yet there is no section 2.1.10 in Appendix E.

RFAI: Please clarify where this information is located within the plan.

2.4.6 Ice Type and Concentrations

Table 2.4-5 Ice Conditions Increasing Discharge Risk and Mitigation Measures

Under the “Operations” column on the right, the sentence needs to be completed/corrected as it reads, “Plan to drill no earlier than 1 April and no later than November” with no date entered and no period to complete the sentence.

RFAI: Recommend a review of the table for appropriate punctuation and dates to identify projected open water dates and prospective drilling dates.

2.5 Existing and Proposed Discharge Detection Procedures

2.5.1 General

The third bullet indicates: “Ensure that no ice blockage exists from accumulated water”, with no indication where ice blockage and accumulated water might be present on the rig.

RFAI: Recommend clarifying by identifying some examples of components or areas that may be susceptible to ice blockage from accumulated water so that the procedure is clear to all personnel.

3.0 Supplemental Information

3.3 Command System

Figure 1.2-1 provides the BCAO Incident Command System (ICS) organization structure, but only lists a few BCAO personnel and their contact info and assignments. Most section chief and unit leader positions are merely identified as being filled by CISPRI or MRM personnel. Section 3.3 provides an extensive ICS overview, names the BCAO QI and alternate QI, and indicates that BCAO’s Incident Management Team (IMT) will fill many rolls. However, BCAO’s IMT members are not identified anywhere in the plan. This does not meet the intent of 18AAC 75.425(e)(3)(C) in that personnel are not named (nor is contact info provided), nor is their specific functional role identified.

RFAI: Recommend updating Section 3.3 to ensure it meets all requirements of 18AAC 75.425(e)(3)(C).

Table 3.6-1 Spill Kit Inventory

This Inventory kit list identifies large and small containers in various locations on the MODU. However, several of the small kits list only one pair of rubber gloves along with other single items like one glow stick. Response equipment like PPE often requires change-out for various unexpected reasons, requiring immediate replacement.

RFAI: Recommend verification of equipment quantities to ensure adequacy for the intended purpose.

3.10.1 General

Specific sensitivities, priorities, and response strategies for the Cook Inlet region are in the following resources:

- Part 9760.1 Sensitive Areas Section and Part 9740 Geographic Response Strategies;
- Introduction to Part 9740 Geographic Response Strategies;
- AK Alaska Regional Contingency Plan; Annex G - Alaska Wildlife Protection Guidelines; and
- CTM, Tactics CI-SA-1 through CI-SA-3.

This section lists reference material for sensitive area priorities. However, the list does not completely or correctly identify some of the reference material.

RFAI: Please clarify the reference material title and locations for cites 9760.1, 9740, and AK Alaska Regional Contingency Plan: Annex G.

3.10.8 Subsistence Use

This section describes the coordination required in the event of a spill to address subsistence resources. This coordination will take place between the UC and the appropriate state and federal agencies including ADF&G, ADEC, and tribal entities. While this section attempts to address subsistence use issues during a spill response, very little background or descriptive information is offered. Additionally, nowhere in section 3 is commercial fishing addressed, nor how an oil spill will affect the fishery, or how operations will be affected by the fishery.

RFAI: Please clarify how the commercial fishing season operations may affect spill response and vice versa.

4.6 LEAK DETECTION FOR TANKS

Other technologies considered during the BAT review include installation of remote monitoring systems to continuously monitor fuel levels in the main fuel tank(s) and/or installation of combustible gas concentrations near larger tank(s). These systems normally include the placement of appropriate sensors on or near the tank(s) and an alarm system in a control room.

Table 4.6-1 Best Available Technology Analysis: Leak Detection for Tanks

This table compares various aspects of Best Available Technology (BAT). However, Alternative 1: Continuous Level Monitoring System- Effectiveness- indicates that in this application, detectable levels of hydrocarbon vapors would be prevalent in the areas of the tanks due to their proximity to rig, diesel engines, etc. Application would result in false alarms. While this may be true of combustible gas concentrations, liquid hydrocarbon (including fuel) tank levels can be visually monitored and as is present throughout other industry facilities, tank levels are routinely monitored continuously via float switch assemblies or other direct reading means to indicate tank levels. Additionally, many of these systems include high- and low-level alarms. Visual inspection should always be part of prevention protocols to verify tanks levels. However, methods to continuously monitor multiple tank levels to ensure none overflow or go dry appears to be a better, if not the best available technology.

RFAI: Please clarify how visual inspection by staff will be more effective and preferable over continuous level monitoring systems that allow more than one tank to be monitored at the same time without the need for personnel to be physically present at a tank, except during fuel transfer operations.

APPENDIX A: BLOWOUT CONTINGENCY PLAN SUMMARY

Perform Notification Requirements as Described Herein

“The IC will relay the collected information to BCAO’s Incident Commander...”. This statement is somewhat confusing. There should be some clarity about which Incident Commander is collecting information and which one is receiving it.

RFAI: Please clarify how multiple area Incident Commanders will be distinguished from each other to avoid confusion.

APPENDIX C: BSEE ADDENDUM

This section addresses the Bureau of Safety and Environmental Enforcement (BSEE) Worst Case Discharge response requirements. Many of our concerns, issues requiring clarification, and recommendations associated with the scenarios provided to meet the 18 AAC 75.425 ODPCP requirements apply to this section (i.e., use of Cook Inlet Oil Spill Model (CIOSM), referencing response in < 10% ice conditions), yet the scenario takes place in July, with no scenario including ice conditions, misidentification of facility owner/operator, etc.

RFAI: Recommend the inclusion of an in ice (10% coverage) response scenario to meet the Worst-Case Discharge response requirements.

APPENDIX E: SPARTAN 151 RIG

E 1.0 RESPONSE ACTION PLAN

E 1.1.1 Response Notification Flowchart Diagram

Figures E-1 and E-2 (pages 291/292) are identified as “first person” and PIC notification “processes”, but neither are structured as a process chart, and don’t really provide clear information for anyone/PIC as to whom they should notify, or what the “process” is in general. Figure E-2 also contains an old “MSO” reference in top left box.

RFAI: Recommend updating these process charts so that they clearly provide relevant notification/process information to BCAO personnel and supplement other plan components that address initial response actions and notifications. Update this and other “MSO” references and change to appropriate USCG Sector.

E 2.1.8 Oil Storage Tanks

Paragraphs 3 and 5 contain old information regarding periodic 3- and 5-year inspections and indicate that the MODU/jackup rig will receive, “*ultra-sonic thickness (UT) testing of the tanks every 5 years...(Last performed January 30th, 2011)*”, and, “*a visual inspection by ABS in 3 years. (Next date scheduled is January 2016).*”

RFAI: Recommend revising this section to remove past dates and update this section to indicate when periodic inspections will take place. This information can be placed within a table to show periodic inspection history and where the next periodic inspection can be inferred.

E 2.3.7 Rig Placement

This section includes verbiage which indicates that, “*Secure placement of the jackup rig will ensure that tides and currents do not affect operations.*” This again doesn’t address what their procedures are or will be to safely shutdown operations and move the jackup rig should ice drift down on the rig when operating in the late season.

RFAI: Recommend revising this section and other sections of the plan as indicated previously to include plans for movement/replacement of the jackup rig if ice threatens the rig.



“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.”

May 19, 2020

Mike Evans
Industry Preparedness Program
Alaska Department of Environmental Conservation
555 Cordova Street
Anchorage, AK 99501

SUBJECT: Comments regarding the Blue Crest Alaska Operations (BCAO), LLC, Oil Discharge Prevention and Contingency Plan, for Cook Inlet Offshore Exploratory Drilling Program (Plan No. 14-CP-5226)

Dear Mr. Evans:

Cook Inlet Regional Citizens Advisory Council (CIRCAC) submits these comments on the BCAO ODPCP. CIRCAC's mission is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and crude oil facility operations in Cook Inlet.

While this plan includes useful features like references to applicable regulations at the beginning of each section, CIRCAC has concerns regarding the lack of a winter scenario in this plan and the absence of any contingencies for dealing with ice impacts to the Mobile Drilling Unit (MODU) or oil in ice, should drilling operations continue into the late fall and an incident occur. While an ADEC directive is in place requiring BCAO to cease drilling into hydrocarbon-bearing formations by October 31st, this directive is not clear as to when all operations must cease and the MODU depart the location. This puts the MODU at risk of being in place when drifting ice might be present. CIRCAC believes that unless more specific restrictions are in place to direct BCAO to cease all operations and secure the MODU, a winter scenario should be developed to demonstrate adequate response actions for operations taking place when ice may be present.

Our enclosed comments identify additional areas for improvement and recommendations for clarification throughout the plan sections. If you have any questions or wish to discuss this further, I can be reached at (907) 283-7222 (due to Covid-19 please leave a message) or via email at MikeMunger@circac.org.

CIRCAC requests a findings document to be supplied at the end of this plan review.

Sincerely,
Michael Munger
Michael Munger
Executive Director

Cc: Graham Wood

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