



"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."

October 27, 2017

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

SUBJECT: Comments on RFAI response regarding Cook Inlet Energy Oil Discharge Prevention and Contingency Plan for Cook Inlet Area Production Operations (Plan No. 17-CP-2016)

Dear Mr. Evans:

Cook Inlet Regional Citizens Advisory Council (CIRCAC) submits these comments on Cook Inlet Energy's August 25 and October 5, 2017 submittals, which were revised in response to the Alaska Department of Environmental Conservation's requests for additional information (RFAI). 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.

We appreciate the significant effort clearly expended by both ADEC and the planholder to improve the plan. This letter identifies some outstanding issues using the RFAI numbering referenced in the RFAI table.

General issue. Many figures in the electronic version of the plan are unclear. This makes it difficult to review content, including whether or not routes of access/egress and muster areas are clearly identified in the figures in Section 1.3. Please clarify whether this is due to reducing the file size for the electronic version or an issue that warrants resolution in the final version of the plan.

RFAI #2 Reporting thresholds. ADEC had conveyed ADNR's request to clarify spill reporting thresholds for the State Historic Preservation Officer and State Office of History and Archaeology. We appreciate Cook Inlet Energy making these changes. CIRCAC requests that the reporting threshold for notifying us be changed from 55 gallons to 20 gallons.

RFAI #3 Tanker trucks/West side of Inlet. This section was modified to clarify how key response resources will be transported to the West side of the Inlet. New language states that in adverse conditions, response resources from Trading Bay Production Facility will be used. Please clarify what this will include and that these resources are sufficient to meet the needs for a significant spill in the area. Please also reference the CISPRI Technical Manual for travel times to the area.

RFAI # 12 Training. We appreciate the addition of important details to this section, including the revisions to Table 2.1-2. This table identifies "Site Specific Spill Prevention" – but does not indicate that positions other than the Drill Site Manager and Rig Manager will receive this training. Please clarify why this training is not provided to the other positions, including Lead Operator and Operator.

*Cook Inlet Regional Citizens Advisory Council * 8195 Kenai Spur Hwy, Kenai, AK 99611-8033*

*Phone: (907) 283-7222 * Fax (907) 283-6102*

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RFAI #36 RMROL. As ADEC notes, this section was revised largely to lower the winds in which it is assumed that mechanical recovery will be viable. This contradicts the CISPRI TM's RMROL section and ADEC's request to ensure the operating limitations are consistent with the CISPRI Technical Manual. We would support lower limits if they are a more appropriate planning assumption for the operating area. However, in this context it presents a contradiction between the PRAC's operating limitations as they are applied across many plans and this plan holder's planning and operating assumptions. CIRCAC request clarification to ensure the most prudent and achievable operating parameters are established and used by the planholder and CISPRI.

RFAI # 38 Non-mechanical response options. We appreciate the language added and agree that, if dispersants are approved for use, monitoring for environmental consequences is both important and required by 18 AAC 75.425(e)(3)(G)(i). However, the referenced Alaska Dispersant Use Plan describes only the procedures and resources needed to monitor dispersant *effectiveness*, not *effects*. Please clarify what procedures or resources will be used to monitor for potential environmental effects during dispersant application.

Additionally, we note significant text changes in Section 2.1.7 Well Control Operating Requirements for Exploration and Production Facilities. Although these do not appear to be tied to a specific RFAI, Cook Inlet RCAC requests clarification regarding whether the closure valves close automatically (as stated) or remotely.

Thank you for considering these additional comments. 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. Cook Inlet RCAC requests a findings document to be supplied at the end of this plan review.

Sincerely,

P.P. 

Michael Munger
Executive Director

Cc: Graham Wood