

"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."

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Kenai Peninsula Borough

Municipality of Anchorage

April 8, 2016

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

SUBJECT: Comments on Hilcorp Operations Alaska, LLC (HAK), Oil Discharge Prevention and Contingency Plan, (ODPCP or C-plan) for Cook Inlet Exploration Program (Plan No. 12-CP-5216); Revision 5 Amendment

Dear Mr. Evans:

Cook Inlet Regional Citizens Advisory Council (RCAC) submits the attached comments and Requests for Additional Information (RAFI) on the Hilcorp Operations Alaska, LLC (HAK), Oil Discharge Prevention and Contingency Plan (C-plan) Revision 5 Amendment for the Cook Inlet Exploration 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 crude oil facility operations in Cook Inlet.

The amendment HAK proposes addresses the addition of an exploration site: the Greystone Pad, located inland approximately twelve miles south of Ninilchik and ten miles northeast of Anchor Point on the Kenai Peninsula. The amendment contains updates to Section 1.6 and Appendix A of the ODPCP and includes summer and winter blowout scenarios at the Greystone Pad. While the amendment is overall very thorough, we have identified some areas related to the underlying assumptions which we believe should be clarified or reconsidered. The enclosed comments outline these items in more detail.

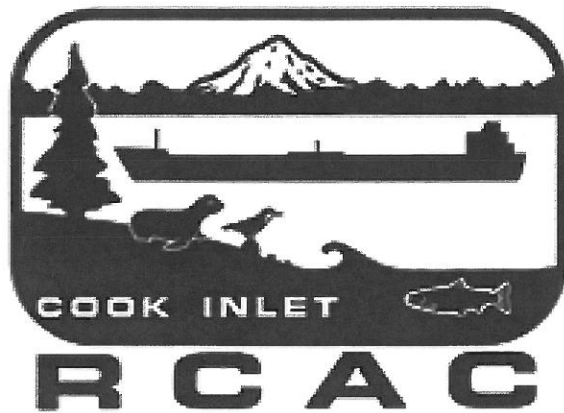
Cook Inlet RCAC requests a findings document to be supplied at the end of this plan review.

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: Graham Wood



Comments and Requests for Additional Information

Regarding

Hilcorp Alaska, LLC

Cook Inlet Exploration Program

Oil Discharge Prevention and Contingency Plan

(12-CP-5216)

Submitted

By

COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL

APRIL 8, 2016

General Comments

Hilcorp Operations Alaska, LLC (HAK) is an Alaskan-based oil and gas company with experience in the oil and gas industry holding drilling leases in the Cook Inlet Basin in Alaska. HAK plans a regional, multi-year oil and gas exploration program to explore for oil and natural gas at the Greystone Pad and other Hilcorp leases in Cook Inlet. This amendment included updates to Section 1.6 and Appendix A of the Oil Discharge Prevention and Contingency Plan (ODPCP) based on HAK's intent to add an exploration site known as the Greystone Pad. The Greystone Pad location is inland approximately twelve miles south of Ninilchik and ten miles northeast of Anchor Point on the Kenai Peninsula.

The critical information for a new site is: (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 the addition of the Greystone Pad exploration site. Cook Inlet RCAC's overarching concerns are that: (1) this new site is not in close proximity to HAK's existing pads located farther to the north and is fairly isolated being miles from a main roadway, and (2) the potential blowout plume from this pad is shown to impact a salmon stream.

1.0 Response Action Plan

1.6 Response Strategies

In Table 1-27 (pg 1-68), response actions for Task Force-1 and -2 include the construction of gravel berms using CISPRI tactic CI-IL-1. Presumably, the gravel would come from the pad itself or could be brought from a gravel pit either on site or very nearby. However, the pad location is not specified, nor is the intended source of the gravel that will be used to construct a berm within 5 hours (according to the plan). Depending on the rate and direction of the oil flow, extensive berming may be required to protect the Chakok River and surrounding area. Cook Inlet RCAC requests clarification on the intended source of the gravel and whether or not calculations have been completed to determine that there is sufficient gravel at a close enough location to build the berms as described in the scenario. For the winter blowout, we suggest consideration should be made for a case in which the ground is frozen but there is not adequate snow coverage for berm construction.

Within Scenario 6: Greystone Exploration Well Blowout During Summer, on page 1-69, there is a statement that indicates, "*Temporary storage options include onshore storage tanks at MGS Onshore Facility.*" The acronym MGS is not spelled out within the amendment or in

the Acronyms and Abbreviation section of their ODPCP. MGS may refer to Middle Ground Shoal Field but this is not specified. Cook Inlet RCAC requests clarification on the MGS Onshore Facility, the temporary storage options available there, and how these resources will be used for an RPS-level blowout at the Greystone location.

In Table 1-29 (pg 1-71) and Table 1-34 (pg 1-80), "*onshore storage units*" are mentioned as storage equipment required for certain tactics. Do these onshore storage units refer to Fast Tanks available onsite at the pad (2-63 bbl Fast Tanks maintained by HAK and identified in Table 3-1 of their ODPCP) or to those Fast Tanks available through CISPRI and identified in their CI-LP-4 tactic in the CISPRI TM? Cook Inlet RCAC recommends clarifying what is meant by "*onshore storage units*" and specifying the type and size to be utilized for each tactic/application identified in the associated scenario tables. This is important to ensure that adequate resources are available to meet the RPS and protect sensitive areas.

In reviewing this amendment, and the associated ODPCP, it does not appear that the Cook Inlet Response Tool (CIRT) is mentioned in either document. Cook Inlet RCAC recommends incorporating use of the CIRT in their response action plan within the ODPCP.