



"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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**Municipality
of Anchorage**

March 8, 2018

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. 17-CP-5216); Major Amendment

Dear Mr. Evans:

Cook Inlet Regional Citizens Advisory Council (CIRCAC) 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) Major Amendment for the Cook Inlet Exploration Program for consideration. 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 overall content of this amendment is in large part satisfactory, with the exception of those items outlined in the enclosed document.

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,

M. Munger

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

(17-CP-5216)

Submitted

By

COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL

MARCH 8, 2018

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. Hilcorp Operations Alaska, LLC (HAK) plans a regional, multi-year exploration program to explore for oil and natural gas at multiple sites within 5 units that extend approximately 57 miles along the Cook Inlet from Kenai to Anchor Point. This amendment included updates to Section 1.6, Appendix A, and Appendix B of the Oil Discharge Prevention and Contingency Plan (ODPCP) based on HAK's intent to add an exploration site known as the Seaview Pad. The Seaview Pad is located on the Kenai Peninsula south of Anchor Point and approximately 1.25 miles east of Cook Inlet.

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 the addition of the Seaview Pad exploration site. Cook Inlet RCAC's main concern is that the potential blowout plume from this pad is shown to impact a salmon stream.

1.0 Response Action Plan

Section: 1.6 Response Strategies (scenarios)

General:

- In both Tables 1-36 and 1-41: Scenario Conditions, the trajectory descriptions are somewhat misleading. In both cases stating that, "The prevailing wind will cause the oil to be blown across the pad and fall in three V-shaped plumes to the pad surface...." Technically the statement is mostly correct, in that deposited oil would be deposited in a V-shaped plume and could be deposited throughout one or more directions (NE, NNE, SSW or S, SW) based on prevailing winds; but not in three separate plumes at once; as demonstrated and reinforced in figure B-56. Recommend revising and clarifying the language.

Scenario 8 - SEAVIEW EXPLORATION WELL BLOWOUT DURING SUMMER

- **Table 1-37 Response Actions:**
 - **Row (ii) Preventing or Controlling Fire Hazard-** This section states that security also blocks traffic on the Sterling Hwy to the northeast and southwest of the blowout allowing only response personnel through. While this is an acceptable action initially it would be up to the State DOT to close the road and

Alaska State troopers to manage traffic upon their arrival. Recommend Hilcorp address the best way to accomplish this important task by using direction through AK DOT and AST's.

- **Row (v)** Protection of Environmentally Sensitive Areas and Areas of Public Concern - This section indicates that HAK personnel make agency notifications to identify priority locations and coordinate a protection strategy. However section (i) indicates all notifications to proper personnel and agencies are made. Please clarify which other agency(s) would be notified if the agency is not part of the notification list used for initial notification.
- **Row (vi)(vii)** contains two instances of typo/missing word.
 - Hour 4 indicates TF-1 will begin deploying skimmers and pumps. Clarify why skimmers and pumps are not deployed when boom is deployed. Understandably, boom deployment may take a couple hours to complete; that effort could be stated in the same activity description as the boom deployment. Recommend using a description that doesn't appear to place skimmers and pumps 2 hours after the boom is in place.
 - This section also indicates 6 bbl fast tanks can be helicoptered to and from MGS onshore if necessary. Recommend revisiting that tactic. There should be locations much closer to store collected oil for transportation to the MGS onshore facility that wouldn't include helicoptering (sling loaded) 6 bbls of oil approximately 80 miles.
 - Additionally, review of this section reveals both a gap in CISPRI's inventory information and over-generalized use of the brand name "Fast Tank". In this section as well as other sections of this amendment and the plan as a whole, the use of multiple 6 bbl fast tanks are referenced. The CISPRI Technical Manual indicates that they have 6 bbl UNITANK storage units available to supplement their Shore Guardian/Skim Pack Kit but does not indicate how many, nor does it reflect additional 6 bbl portable storage tanks in their inventory despite the fact that they do exist. Recommend that this plan and the CISPRI Technical Manual be updated to reflect accurate descriptions and inventories for portable storage tanks and bladders so that plan reviewers and responders have a clear understanding of the type and quantity of equipment available for response.
- TF-6: Recommend specifying sorbent boom is deployed.

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- TF-7: It is stated that micro barges would be used to store recovered oil and that tow vessels will rotate the micro barges out for lightering in necessary. However, section (viii) Lightering Procedures is listed as “Not applicable”. Recommend including the proper CTM tactic if “shuttling” micro barges for lightering will take place.

Scenario 9 - SEAVIEW EXPLORATION WELL BLOWOUT DURING WINTER

- **Table 1-41: Scenario Conditions:**

- **Row (iv) Surveillance and Tracking of Oil; Forecasting Shoreline Contact Points** - This section indicates, “If oil escapes containment and recovery actions on the Anchor River...” but does not include booming tactics in Tables 1-42 or 1-43 that address impacts to the Anchor River. Additionally, the scenario indicates that ice concentration on the Anchor River in the winter is moderate which means that there is a possibility for oil to impact open water on the river and migrate downstream. Recommend updating this scenario to reflect booming tactics that would be used if the Anchor River is impacted as the first sentence in row (iv) suggests.
- **Row (ix) Transfer and Storage of Recovered Oil/Water; Volume Estimating Procedures** - This section refers to Appendix C as the location of the list of tanks for rent. The HAK ODPCP has been revised and this list is now located in Appendix E - Regulated Oil Storage Tanks. Please revise.