



"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."

July 10, 2018

Department of Natural Resources
Division of Oil and Gas
550 W. 7th Ave, Suite 1100
Anchorage, AK 99501-3560

SUBJECT: Comments on LO/CI 18-001 Seaview Pad, Well Drilling and Testing

To whom it may concern:

Cook Inlet Regional Citizens Advisory Council (CIRCAC) submits the attached comments regarding the Hilcorp Operations Alaska, LLC (HAK), Cook Inlet Exploration Program for consideration.

CIRCAC is a non-profit corporation organized exclusively for the oversight, monitoring, assessing and evaluation of oil spill prevention, safety and response plans, terminal and oil tanker operations, and environmental impacts of oil tanker and oil terminal operations in Cook Inlet under the provisions of Section 5002 of the Oil Pollution Act of 1990. Our mission is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and oil facility operations in Cook Inlet. CIRCAC consists of 13 members from Cook Inlet communities, as well as Alaska Native groups, commercial fishing and aquaculture, tourism, recreational and environmental interest groups that have a significant stake in the environment and resources at risk from oil production and transportation in the region.

In line with our mandate to oversee, monitor, assess, and evaluate crude oil operations within Cook Inlet. We have previously reviewed and submitted comments regarding the Hilcorp Operations Alaska, Oil Discharge Prevention and Contingency Plan to the Alaska Department of Environmental Conservation (ADEC) for this project (specifically the Seaview Pad). In those comments we raised concern regarding the proximity of the pad location to the Anchor River based on Hilcorp's projection that a discharged crude oil plume from a blowout would impact the Anchor River.

We maintain that same concern regarding this application. Our understanding of the Department's (DNR), Mitigation Measures for then Cook Inlet Areawide 2017 Competitive Oil & Gas Lease Sale is that siting of onshore facilities, to the extent practicable, will be prohibited within one-half mile of the banks of the main channel of the Anchor River along with several other rivers listed. The mitigation measures go on to say that facilities may be sited within these buffers if the lessee demonstrates to the satisfaction of the director, in consultation with the Alaska Department of Fish and Game (ADF&G), that site locations outside these buffers are not practicable or that a location inside the buffer is environmentally preferred.

We are very concerned about the proximity of this site to an anadromous stream (the Anchor River) should an uncontrolled discharge take place. We ask the Department to

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ensure this is the only practicable site location within the lease, as it does not appear to be environmentally preferred given the fact that Hilcorp's ODPCP blowout plume calculations indicate likely impact to the Anchor River should such an event occur. If there is no other location suitable within lease, we urge the Department and the ADF&G to carefully review the mitigation measures cited in the application to ensure their suitability to the protection of this important resource.

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