



"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."

June 22, 2015

Members

*Alaska State
Chamber of
Commerce*

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

*Alaska Native
Groups*

SUBJECT: Requests for Additional Information on Cook Inlet Energy, LLC Oil Discharge Prevention and Contingency Plan for Cook Inlet Area Exploration Operations, Plan No. 15-CP-5115 (Plan Renewal)

*Environmental
Groups*

Dear Mr. Evans:

*Recreational
Groups*

Cook Inlet Regional Citizens Advisory Council (RCAC) submits the following Requests for Additional Information (RFAI) on the Cook Inlet Energy, LLC Oil Discharge Prevention and Contingency Plan (C-plan) for Cook Inlet Area Exploration Operations, Plan No. 15-CP-5115 (Plan Renewal) 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 oil facility operations in Cook Inlet.

*Aquaculture
Associations*

*Fishing
Organizations*

Cook Inlet RCAC found the C-plan to be clear and thorough. It provides the basis for both on-land and on-water spill response should it be required at Cook Inlet Energy exploration sites on both sides of Cook Inlet, including pads north of Anchorage which were incorporated into the previous plan by amendment in 2014. Our comments below identify fairly minor issues of clarification or other changes that we believe will further enhance the quality of the plan. In addition we suggest that the planholder ensure that references to regulatory citations are current (particularly in the scenario tables), references to tactics are clearly identified as being from CISPRI or the STAR Manual, and use of units is consistent throughout (meters vs. feet, etc.). Figures should also be labeled with distances and other key information such as the deposition zones, as appropriate.

City of Kodiak

City of Kenai

City of Seldovia

City of Homer

RFAI #1: Improve clarity of notification responsibilities. Figure 1.1 and Table 1.1-1 provide important details to guide the first notifications in the event of a spill. However, the checklist and flow chart do not appear to align: the first person to notice the spill should not necessarily be concerned with what is needed for response activities; likewise, the flow chart clearly identifies the HS&T Manager as the point for notifying ADEC, but this is included on the checklist in Table 1.1-1 for the CEO or Drilling Manager (or first person to notice the spill). If it is intended that these other individuals would play the role of ensuring that the HS&T Manager made the call to ADEC, then perhaps all other agency notifications should be included as well.

*Kodiak Island
Borough*

*Kenai Peninsula
Borough*

*Municipality of
Anchorage*

We also suggest that the flow chart should include the appropriate first notification contact for the Mat-Su Borough in addition to the Kenai Peninsula Borough.

Additionally, in Section 1.2.3 the phone number and address for the PRAC should be corrected.

RFAI #2: Clarify role of Unified Command in decision to implement in-situ burning.

Section 1.7.4 describes the decision-making process that would be involved if in-situ burning were to be conducted. We suggest that this should include language to clarify that the Unified Command will ultimately make that decision.

RFAI #3: Consider use of alternate or additional equipment. Section 1.5.3 describes the deployment strategies, including considering the potential impact of weather and season. We suggest that the planholder consider using Nodwell tracked vehicles, or an equivalent, to move personnel and equipment overland. These vehicles can be used in a wide range of weather conditions and through all seasons.

RFAI #4: Consider additional approaches to protect Middle River and Cook Inlet from blowout at the Tutna location. Section 1.8.1 describes the collection points that would be used to recover oil with the goal of keeping it first out of the Middle River, if that is not achieved, out of Cook Inlet. We agree that the geographic response strategy for the river is designed to exclude oil that may come from the Inlet, and suggest that an additional collection point within or close to the primary affected area could be added to reduce the impact to Middle River. In addition, CISPRI tactics could be deployed to reduce impacts to the River and Inlet, such as: CI-IL-1A & 1B, CI-IL-2, CI-IL-5, CI-IL-6, CI-IL-7, and CI-IL-8.

RFAI #5: Describe process for snow melt in winter scenarios. In Table 1.8.2-3, the use of Tiger or Baker tanks for storing or melting snow is indicated. Please describe how the snow melt will be conducted, and with what heat source.

RFAI #6: Align references to safety zones with CISPRI Technical Manual. Table 1.8.2-3 also describes how responder safety will rely on the use of exclusion zones, personal protective equipment, and safety briefings. We recommend using the terminology and clear distinctions regarding access to different areas that is described in the CISPRI Technical Manual (i.e., hot zone, warm zone, cold/support zone).

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