



"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."

April 26, 2021

John Harry
Industry Preparedness Program
Alaska Department of Environmental Conservation
555 Cordova Street
Anchorage, AK 99501

SUBJECT: Comments on Furie Operations Alaska, LLC, Oil Discharge Prevention and Contingency Plan for Cook Inlet Exploration Program (Plan No. 12-CP-5184)

Dear Mr. Harry:

Cook Inlet Regional Citizens Advisory Council (CIRCAC) submits these comments on the Furie Operations Alaska, LLC, Oil Discharge Prevention and Contingency Plan (ODPCP) for Cook Inlet Exploration Program. 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.

While we appreciate that 18 AAC 75.420(c) allows a plan holder to submit a new plan "*if no change will be made in the plan*," however, we find it wholly unacceptable that this plan application was approved as is and allowed to move to the review stage. The transmittal letter accompanying the plan on March 23, 2021 acknowledged that there would be updates made during the RFAI process. The updates should have been made *before* the plan application was deemed sufficient for review and circulated for comment, even if those changes were minor.

We have an additional level of concern regarding this particular plan given the ownership change that occurred in 2020. While the March 23 transmittal letter identifies known updates as "area plan references and changes to website links," it seems likely that many more changes should have been made before the public review began. First and foremost, it appears that many critical aspects of the plan require updates, including:

- The operations covered in the plan do not mention the *Julius R* platform at all but describe two jack-up rigs used previously for exploration activities. This calls into question the validity of the response scenarios as well as prevention elements.
- No plan update was submitted associated with the ownership change as required by regulation. Furthermore, the plan itself indicates ownership change as a trigger for updating the plan.
- Related to the ownership change, it is not clear that personnel identified in the plan still work for the company. This relates to those identified for notification or IMT roles as well as those whose signatures still reside in the plan.
- Because it appears that the signatory Furie representative in the included Primary Response Action Contractor contract (with CISPRI) dated January 3, 2012 is no longer a Furie employee nor represents Furie, it would appear that the contract shown is invalid or at the least out of date.

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Having said all that, we have conducted a thorough review of the plan as submitted. Our enclosed comments identify areas for improvement and recommendations for clarification throughout the plan sections. If you have any questions or wish to discuss this further, our Director of Operations may be contacted at (907) 776-5223 or via email at SteveCatalano@circac.org. I may be reached at (907) 283-7222 or via email at MikeMunger@circac.org. CIRCAC requests a findings document to be supplied at the end of this plan review.

Sincerely,



Michael Munger
Executive Director

Cc: Graham Wood