

"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 14, 2016

Members

Alaska State Chamber of Commerce

Alaska Native Groups

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Aquaculture Associations

Fishing Organizations

City of Kodiak

City of Kenai

City of Seldovia

City of Homer

Kodiak Island Borough

Kenai Peninsula Borough

Municipality of Anchorage

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) originally submitted comments on March 18, 2016 and provides these additional comments for the second Requests for Additional Information (RFAI) round on the Furie Operations Alaska, LLC, Oil Discharge Prevention and Contingency Plan (C-plan) for the Cook Inlet Exploration Program on behalf of our member entities. The mission of the CIRCAC is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and oil facility operations in Cook Inlet.

We appreciate that ADEC included our previous comments in the original RFAI document, and it appears that Furie has addressed most of them satisfactorily. The RFAI process to date has resulted in numerous changes and improvements. With many, if not all, issues improved, we have identified some additional items to further enhance plan clarity. Our enclosed comments reflect those areas that we still believe require attention, as well as additional comments based on further review of the documents provided as part of Furie's RFAI response package.

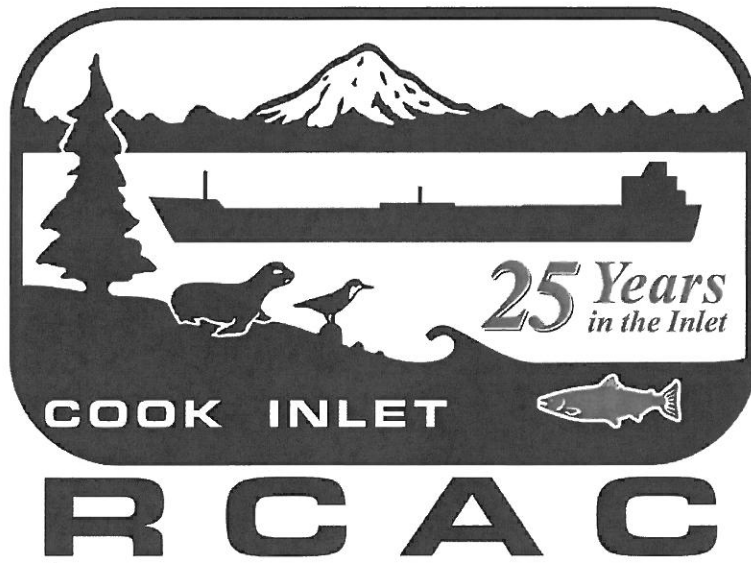
CIRCAC requests a findings document to be supplied at the end of this plan review.

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 Munger@circac.org.

Sincerely,

Michael Munger
Executive Director

Cc: Graham Wood



Comments and Requests for Additional Information

Regarding

**Furie Operations Alaska, LLC
Cook Inlet Exploration Program
Oil Discharge Prevention and Contingency Plan
(12-CP-5184)**

Submitted

By

COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL

JUNE 14, 2016

General Comments

Furie Operations Alaska, LLC (Furie) is an Alaskan-based oil and gas company holding drilling leases in the Cook Inlet Basin in Alaska. Furie plans a multi-year exploration plan to explore for oil and natural gas in the Kitchen Lights Unit (KLU) and other Furie leases in Cook Inlet using a zero-discharge jackup drilling rig.

These comments and Request for Additional Information (RFAI) are based upon our review of the response package recently submitted by Furie from the original RFAI including a document containing redline/edited portions of the C-Plan. All comments/RFAI are based on review of this document unless otherwise noted.

Introduction

The Introduction on page I-xxi states that Furie will use a Mobile Offshore Drilling Unit “or a comparable jack-up rig.” We understand these to be the same thing, and request clarification if there are actually two potential types of temporary rigs that may be used for the operations in this plan.

In the first paragraph on page I-xxii, a reference is made to Figure 1.5-3 which depicts marine response times for Cook Inlet. However, this figure has been removed (Item 24 of the ADEC RFAI template document). We recommend editing this paragraph to reference CISPRI Tactic CI-LP-1 as Furie indicates in their RFAI response.

1.0 Response Action Plan

1.1 Emergency Action Checklist

Table 1.1-2 Blowout checklist

Consider reorganizing this table to reflect the appropriate ordering of safety first actions, such as ensuring that the No Smoking/No Open Flame policy is in place immediately after the Furie drilling Supervisor is notified, then ignition sources are extinguished, etc.

This recommendation was addressed as Item 9 in the ADEC RFAI template doc, but we found Furie’s response unclear. The redline document does not contain Table 1.1-2 in its entirety so it is unclear whether changes were made. Recommend clarifying whether this table was edited or provide the relevant pages containing the table to ADEC to review/confirm content.

1.1.2 -

The checklist under this section on page 1.1-2 was deleted. This Section header should be deleted.

1.2.4 Agency Notification and Emergency Contacts

This section refers to Table 1.2-2, yet this table does not exist in the document. Table 1.2-3 is titled Agency Notification Chart. This section should be updated accordingly.

Table 1.2-3 Agency Notification Chart

Within this table on page 1.2-10 reportable spill size for CIRCAC indicates “All spills of 55 gallons or greater.” We request that CIRCAC be notified of all reportable spills, and that this be specified in the plan.

1.5 Deployment Strategies

1.5.2 Immediate Response

Table 1.5-1 identifies facility response teams including crane operators. All other positions seem to reflect the second shift or opposite crew. However, the crane operator does not follow the same pattern. Please clarify.

1.5.3 Activation of Spill Contractor

On page 1.5-5 the third bullet indicates that, “CISPRI vessel to the upper Cook Inlet: Distance from Kenai-- approximately 2 hours to deploy large vessels and fishing boats with response equipment reaching the rigs during the summer and ice-free seasons.” This statement is somewhat confusing. Clarify if vessels are coming from Kenai or vessels and equipment deploying from CISPRI (in Nikiski) to upper Cook Inlet.

1.5.4 Spill Response at Rig - CISPRI

In Table 1.5-2 on page 1.5-10, there is reference to “VOSS Kenai” and “VOSS Homer.” Please clarify the source of this information.

1.6 Response Strategies

1.6.3 Blowout Control and Furie Well Control Procedures

The second paragraph under “Incident Command Systems Consideration” on page 1.6-10 indicates, “If the decision to implement a Unified Command were made, the Furie IMT through the Unified Command (UC) would coordinate and prepare permit requests for emergency response operations through the appropriate borough, state and federal entities.” This sounds like the decision to implement the UC is solely up to the responsible party. We suggest that the wording be changed to reflect the fact that this decision is made in consultation with the FOSC and SOSC.

1.6.4 Discharge Tracking

The third paragraph on page 1.6-18 indicates, “Impacted areas in CIOISM assume no shoreline protection strategies.” CIOISM is not operational at this time. Please clarify or replace.

1.7 Non-Mechanical Response

1.7.3 Obtaining Permits and Approvals

In the first paragraph under this section (page 1.7-1), a reference is made to Annex B of the Unified Plan. This should be changed to Annex F.

Under "*Decision Criteria*" for In-Situ Burning we recommend using criteria as listed in the ISB Guidelines in the Unified Plan to describe the conditions in which burning may be considered.

Under "*Decision Criteria*" for Dispersants we recommend referencing the Dispersant guidelines as approved in January 2016 and follow those protocols.

Section: 3.3 Command System

3.3.3 Unified Command

"Unified Command is an option Furie will consider implementing for significant oil spill situations..." As noted above, we recommend adding language to specifically commit to using a UC in the event of a significant spill.

In their response to this recommendation, Furie indicates that, *"changing the plan to read "will implement" instead of "will consider" obligates Furie to implementing the UC and Furie cannot commit governmental agencies to doing so."*

While it's true that Furie cannot compel government agencies to implement a Unified Command structure, use of stronger language will demonstrate Furie's commitment to supporting and participating in a UC when implemented. Recommend modifying verbiage in 3.3.3 to read: "In the event that a Unified Command structure is implemented for any spill scenario, Furie will participate fully as a member of the UC and in cooperation with state and federal agencies."

Section: 3.4 Realistic Maximum Operating Limitations

3.4.6 Summary of Limiting Conditions

The third bullet in this section (page 3.4-3) references BCAO. Clarify why Blue Crest Alaska Operating information is included in this plan and correct as necessary.

Section 3.4 does not appear to contain information on percentage of time that response would be ineffective due to weather as required in 18 AAC 75.425 (e)(3)(D). Recommend updating this section accordingly.

Section: 3.6 Response Equipment**3.6.3 Onboard Response Equipment**

It is understood that the rig decks have combing in place to contain any spill on the rig but it is not clear if there is portable diking materials to prevent the spread of a spill within any particular area or space. Within Table 3.6-1 Spartan 151 Onboard Response Equipment, please clarify if there is portable diking material to prevent spread of a spill over deck areas.