

"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."

- Members
- Tourism Organizations
- Alaska Native Groups
- Environmental Groups
- Recreational Groups
- Aquaculture Associations
- Commercial Fishing Organizations
- City of Kodiak
- City of Kenai
- City of Seldovia
- City of Homer
- Kodiak Island Borough
- Kenai Peninsula Borough
- Municipality of Anchorage

January 31, 2017

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

RE: Comments and requests for additional information on Hilcorp Alaska, LLC Oil Discharge Prevention and Contingency Plan for Cook Inlet Production Facilities (#16-CP-2008)

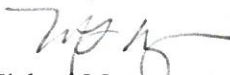
Dear Mr. Evans:

Cook Inlet Regional Citizens Advisory Council has reviewed the attached proposed amendment to Hilcorp Operations Alaska, LLC's (HAK) Oil Discharge Prevention and Contingency Plan (C-plan) for Cook Inlet Production Facilities on behalf of our member entities. Our mission is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and crude oil facility operations in Cook Inlet.

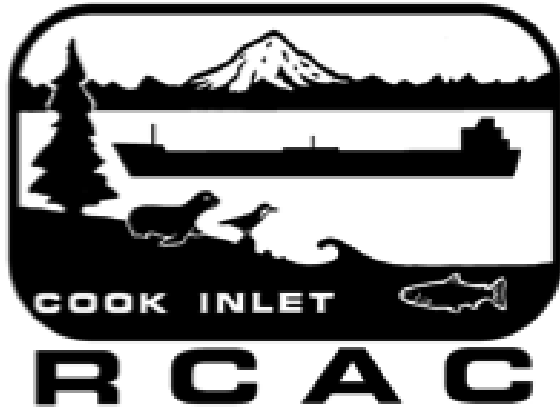
Our enclosed comments identify a number of issues where we believe the plan falls short of ADEC regulations and the recently released ADEC Application Package Review Guidance Document. This plan outlines Prevention and Response operations for multiple facilities and operations over a very large geographic area that spans very different environmental, response, and logistical considerations. We look forward to significant improvements in the overall plan organization, level of detail, and clarity of presentation based on the best efforts of the ADEC and the planholder following this first round of public comments.

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



Comments and Requests for Additional Information

Regarding

Hilcorp Alaska, LLC

Cook Inlet Production Facilities

Oil Discharge Prevention and Contingency Plan

Submitted

By

COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL

JANUARY 31, 2017

Introduction

Hilcorp Alaska, LLC (HAK) has submitted its oil discharge prevention and contingency plan (c-plan) for production facilities in the general region of Cook Inlet. These include 17 offshore platforms, onshore production sites, both on-land and subsea pipelines, flowlines, and storage facilities. In these comments we reference both the regulations at 18 AAC 75 Chapter 4 and ADEC's c-plan Application Package Review and Guidance Document dated December 2016 (henceforth, "ADEC Guidance").

The plan does not include a Table of Contents with tables and figures as required at 18 AAC 75.425(c).

In addition, many sections have been revised such that the name or term has been replaced with acronyms at first use, without explanation. We suggest that especially where acronyms are Alaska-specific, this detracts from the utility of the document as a working plan as required at 18 AAC 75.425(a).

Figure I-1 shows the HAK facilities "as well as other Oil and Gas facilities in Cook Inlet." There are two figures shown, and it is not clear which is the current figure. It would be clearer if only facilities covered by this plan were included in the figure.

1.0 Response Action Plan

1.1 Emergency Action Checklist

The checklist in Table 1-1 should be called "Emergency Action Checklist" in keeping with the regulatory terminology and name of the section.

We suggest that safety measures should be considered at this stage, besides developing a site safety plan and potentially calling local police and fire department (ADEC Guidance indicates that immediate actions should consider safety as well as containment/control of the spill and initial mobilization of response actions.)

- Offshore platforms and remote production areas should have defined procedures to determine when evacuation or mustering may be warranted.
- Please clarify how personnel will know when police/fire departments should be called.

It is not clear that Table 1-1 or Figure 1-1 are useable as wallet cards as suggested in 18 AAC 75.425(e)(1)(A).

If local fire and police are to be notified as indicated in Table 1-1, the necessary information should be provided for each location. This fits with the intent of the regulations and is specified in the ADEC Guidelines.

1.2 Reporting and Notification

Section 1.2.2 External Notifications states that response action contractors, stakeholders, and supporting agencies may also be contacted depending on spill response needs.

ADEC Guidance indicates that such groups, including Regional Citizens Advisory Councils, should be identified by name with contact information provided. We request that CIRCAC be identified as a stakeholder for notification, including the following contact information: Cook Inlet RCAC, Director of Operations at 907-283-7222 after hours cell at 907-398- 6215.

Section 1.2.3 discusses Qualified Individuals (QI). It states that the QI must be trained and authorized to “obligate funds required to carry out response activities.” It also states that the QI is not responsible for “contracting or obligating funds for response resources beyond the full authority as designated by the owner/operator.” Please clarify the extent of this authority, and whether any limitations on this authority may possibly impede the ability to obligate funds as needed to mount a large response promptly.

Section 1.2.4 summarizes Written Reporting Requirements. It references the use of Incident Command System (ICS) forms. It is not clear why this reference is made, as there are no ICS forms for notification.

1.3 Safety

Section 1.3 should describe the duties of the safety officer and identify that person (or persons) by name, title, and contact number as per the ADEC Guidelines. (Alternatively, this section could reference Section 1.2.1, Table 1-2 for that information.)

This section should also identify all applicable safety standards, as required by 18 AAC 75.425(e)(1)(C). These should include the regulations identified in the ADEC Guidelines:

- Title 29 Code of Federal Regulations (CFR) Part 1910, Occupational Safety & Health Standards
- 29 CFR 1904, Record Keeping and Reporting Occupational Illnesses
- 29 CFR 1910.132-37 Subpart 1, Personal Protective Equipment
- 29 CFR 1910.38-39, Employee Emergency Action Plans and Fire Prevention Plan
- 29 CFR 1910.1200, Hazard Communication Standards
- Alaska Department of Labor and Workforce Development, Labor Standards and Safety: Occupational Safety & Health Standards (8 AAC 61.1010 - 1190)

1.3 Communications

In addition to the information provided, this section should describe the communications equipment available at the many diverse locations covered in the plan, as well as procedures for its use, backup or system expansion options, and the different channels or systems that will be used for air, vessels, and shoreline operations (all as described in the ADEC Guidelines). While there is a reference to CISPRI’s resources, very limited information is provided for HAK’s own systems.

1.5 Deployment Strategies

Section 1.5.2 states that when water is low at the OSK dock, CISPRI’s smaller vessels and mini/micro barges will be loaded. Please indicate whether the need to use these resources in this way would impact response times, as we would otherwise assume that these smaller resources were able to mobilize more quickly even as larger assets are being loaded.

Section 1.5.3, Transporting Equipment and Personnel in Adverse Weather, provides some limited discussion of the deployment of vessels in ice conditions. Information should be provided regarding how remote locations on the Western side of Cook Inlet will be accessed during adverse conditions, including the potential for changing conditions when ice roads/travel over snow are not possible in fall/spring or when snowfall levels are low as has been seen in recent years. Similarly, please indicate alternatives if gravel runways identified in Table 1-6 cannot be used.

Table 1-6 lists staging areas in the Cook Inlet region. Boat launch ramps in Anchorage, Homer, Kenai, Nikiski's OSK dock, and Seldovia should be added.

1.6 Response Scenarios

General Comment about the Scenarios

HAK has chosen to use different formats for their scenarios: one lists their actions in line with ADEC requirements under 18 ACC 75.425 (e)(1)(F) [i thru xii], while the other follows the same ADEC requirements but includes hourly benchmarks. The latter approach facilitates a better understanding of the response timeline, and we suggest that this approach should be used consistently throughout the scenarios.

Additionally:

- There is no winter scenario for the Trading Bay Production Facility, and
- There are no Scenario Conditions for the Granite Point Tank Farm Major Tank Rupture.

We suggest the above comments warrant some significant revisions to the scenarios, which will also afford the opportunity to address the issues identified below.

Scenario 1- Major Tank Failure and Onshore Spill at Trading Bay Production Facility (TBPF)

Table 1-8

(vi) Spill Containment and Control Actions indicates that a dike is built and references Figure 1-4; however, Figure 1-4 only shows the flow path of the spilled crude, it does not indicate where a dike would be constructed. Recommend adding location of all spill control measures employed as well as drainage diagram to indicate potential flow of spill to aid in verification of containment and control measures.

(vii) Spill Recovery Procedures indicates that on day 3, two additional super suckers arrive from Nikiski. The three trucks operate using 2-inch x 3-inch diaphragm pumps until recovery is complete. Please clarify why and how diaphragm pumps are being used with super sucker vacuum trucks.

(ix) Transfer and Storage of Recovered Oil/Water; Volume Estimating Procedure indicates that oil recovered from secondary containment and from oil accumulation in northeast corner of the facility will be stored in one of two 50,000 bbl retention pits. To best understand the adequacy of the retention pits to safely store recovered oil, please

clarify the role the retention pits play in the facility's operation and if their construction specifications comply with State requirements.

(ix) Transfer and Storage of Recovered Oil/Water; Volume Estimating Procedure -This section references STAR Manual tactics LST, POL, and Appendices C and D. Please clarify the use of Appendices C and D.

(x) Plans, Procedures, and Locations for Temporary Storage and Disposal indicates that oiled debris is stockpiled in lined dumpsters or other lined containment at the TBPF. Please clarify total storage capacity of dumpsters and other lined containment located at the TBPF.

(x) Plans, Procedures, and Locations for Temporary Storage and Disposal also references an ADEC letter of approval for ongoing storage of oily solids in the winter waste cell. Please clarify if storage of oily waste from a spill of this magnitude is covered by this approval and the capacity and construction of the winter waste cell.

(xi) Wildlife Protection Plan indicates that, *"Wildlife hazing equipment is mobilized to the spill site and is utilized as needed."* The next paragraph indicates that, *"bird capture and rehabilitation personnel from the CISPRI IBR are notified and put on standby for potential activation if required."* It is not clear if use of the wildlife hazing equipment is restricted to qualified wildlife capture and rehab personnel or if the intent is for this equipment to be available for anyone's use. Recommend clarifying in this section (and elsewhere in the plan where this practice is mentioned) that only qualified personnel should utilize wildlife hazing equipment.

Table 1-9 - Oil Recovery Capability

Column B identifies the number of Recovery Systems to be used, but does not include the 2-inch x 3-inch diaphragm pumps referenced in Table 1-8. Please clarify.

Additionally the table indicates a de-rated pump capacity of 500 boph from a 1,750 gallons per minute pump rate. We were unable to locate pump capacities for the 6" Godwin pump in the CISPRI Technical Manual. Please verify the pump rates and de-rated pumping capacity.

Scenario 2 - Offshore Production Well Blowout at King Salmon in Summer-Conditions

Table 1-12

This section references a wind rose (figure 1-5) for the months of May - October in Nikiski. The scale of the wind rose used has been changed. It is unclear why the change was made. Please clarify.

Table 1-13

(iv) Surveillance and Tracking of Oil; Forecasting Shoreline Contact Points cites CISPRI's Electronic Spill Tracking system but does not mention spill trajectory modeling. Recommend inclusion of spill trajectory modeling e.g. General NOAA Operational Modeling Environment (GNOME).

(v) Protection of Environmentally Sensitive Areas and Areas of Public Concern references Figure 1-6 as a basis for the trajectory. While the illustration in Figure 1-6 depicts a representation of the platform and shows two different vectors for oil leaving the platform, it does not represent the trajectory of oil once it impacts Cook Inlet; only an oil trajectory model using tidal currents, forecasted winds and other data points can effectively predict the probable course the oil may follow. Aerial surveillance is one method to track oil in water (when visibility allows), however trajectory modeling is important for responders to pre-stage equipment *before* an impact occurs. Recommend using the GNOME spill trajectory model to identify sensitive areas that may be impacted.

Additionally, this section does not mention Geographic Response Strategies (GRS) to be deployed but rather references Section 3.10, which simply identifies the fact that GRS exist. This section should identify which GRS would be deployed for the purpose of the scenario and what resources, if any, would be protected even without a pre-established GRS. This is critical to ensuring that sufficient resources are available for shoreline protection and for illustrating the planholders' decision-making process regarding the protection of sensitive areas.

(vi) Spill Containment and Control Actions and (vii) Spill Recovery Procedures:

- The description of the response strategy could be improved by identifying which response barge is being used for each tactic; rather than referencing Table 1-14. We strongly recommend identifying specific response assets by either name or capacity when those assets are tied to a specific activity in the timeline.
- (vii) Spill Recovery Procedures identifies the arrival of four contract vessels with boom at Hour 12 to increase oil encounter rate. CISPRI Technical Manual Tactic CI-OW-1, 3, and 6 are referenced. However, four contract vessels can only assist two operations. Please clarify which tactics will be deployed and with which resources. (Please also clarify how CI-OW-6 will utilize boom without additional vessels and boom.)
- Table states that TF-1 Class 1 Contract vessels and barges will decant into a boomed area in the Inlet before offloading. While the section states that decanting permits will be obtained prior to decanting, it is difficult to understand the rationale for decanting into a "boomed area in the Inlet" before offloading. CISPRI SOP for decanting on water storage is to pump decanted fluids back into the skimming collection area for immediate recovery of any sheen or oil. Please clarify the tactic of decanting into a boomed area of Cook Inlet. Decanting in a boomed area other than where active skimming is in progress poses a problem in Cook Inlet due to the high currents encountered. Any stationary boom location would experience entrainment at all but slack tide periods making stationary booming a poor choice.
- Table states that TF-2 will carry out lightering operations using mini barges. No reference is provided for this tactic. Please describe it in detail or reference a tactic in the CISPRI Technical Manual or STAR Manual.
- TF-2 is also identified as carrying out decanting procedures prior to offloading at Christy Lee Platform. Please clarify exactly how this will be carried out; as noted

earlier, the method mentioned earlier to be used by TF-1 is not the method prescribed by the CISPRI Technical Manual (CTM) illustration.

(ix) Transfer and Storage of Recovered Oil/Water; Volume Estimating Procedures discusses portable storage tanks and references Appendix C. Appendix C contains facility overviews and diagrams, none of which describe or list the location of portable storage tanks.

(ix) Transfer and Storage of Recovered Oil/Water; Volume Estimating Procedures also references transferring recovered fluids to a platform via a diesel line and a jumper hose. This is not a tactic contained in the CISPRI Technical manual or the STAR Manual. Please clarify the tactic and that all CISPRI personnel and that all Class 1 contract vessel personnel have the appropriate training and experience to implement this approach.

(x) Plans, Procedures, and Locations for Temporary Storage and Disposal discusses managing oily solids. CI-WM-1 through CI-WM-7 are referenced. Please clarify how the tactics for management of liquid wastes, decanting, decontamination of small vessels, decontamination of large vessels, decontamination of equipment, and oiled debris are pertinent to the management of oily solids or identify only the tactic(s) that will be used for this purpose.

(xi) Wildlife Protection Plan discusses wildlife species and habitats along with bird hazing and capture but fails to mention and consider contact and hazing of species other than birds. The tactics referenced in the CISPRI Technical Manual column does not include CI-W-6 Bear Guard as a tactic. Recommend including CI-W-6 as a tactic, since this is a summer scenario it is likely TF-4 (GRS task Force) or any activities on shore or on the shoreline may encounter bear activity.

(xii) Shoreline Cleanup Plan discusses assessing ESA and consulting with natural resource trustee agencies and ESA maps created by NOAA. Suggest correcting this to refer to NOAA's Environmental Sensitivity Index (ESI) maps, if these are the resources intended.

Scenario 3 - Offshore Production Well Blowout at King Salmon Platform in Winter-Response Strategy

Table 1-18

(iv) Surveillance and Tracking of Oil; Forecasting Shoreline Contact Points again cites the use of CISPRI's Electronic Spill Tracking system but does not mention the NOAA's GNOME online spill trajectory tool. We recommend using GNOME to model spill trajectory.

(iv) Surveillance and Tracking of Oil; Forecasting Shoreline Contact Points also indicates that CISPRI's Electronic Spill Tracking system is delivered to the slick by vessel within 8 hours, instead of the 3 hours identified in the previous scenario. Please clarify why the timelines are different or correct to the most accurate. (It is not clear that winter conditions would delay deployment by so long, but please explain if they do.)

(v) Protection of Environmentally Sensitive Areas and Areas of Public Concern-references Figure 1-8 as a basis for trajectory. While the illustration in Figure 1-8 depicts a representation of the platform and shows three different vectors for oil leaving the platform, it does not represent the trajectory of oil once it impacts Cook Inlet. Similar to

the issue with the previous scenario, please indicate use of trajectory modeling for oil that reaches the water.

(vi) Spill Containment and Control Actions and (vii) Spill Recovery Procedures-

- This section references lightering to a platform when storage capacity is reached. Since this is not a tactic contained in the CISPRI Technical Manual or the STAR Field Guide, clarify which platform and the means the vessel has to transfer to a platform, the training, and experience of the contract vessel and crew to accomplish this tactic.
- This section indicates that TF-1 and TF-2 will decant using ice as containment before offloading to a platform and that secondary oil will be skimmed. Since this is not a tactic contained in the CISPRI Technical Manual or the STAR Field Guide, please clarify if this tactic is approved to receive a decanting permit, describe the ice conditions that would be necessary for its implementation, and indicate what changes to those conditions would preclude use of this tactic.
- This section indicates that by Day 2, TF-4 is set up with two CISPRI Barges in ice-free waters south of the recovery area. Vessels may use the barges as an alternate lightering option if necessary. The CISPRI Technical Manual describes lightering to Barge 141 or CISPRI Responder as the primary means to lighter micro and mini barges and O/W separator tanks. Please clarify why this is cited as an alternate lightering option.

(ix) Transfer and Storage of Recovered Oil/Water; Volume Estimating Procedures references transferring recovered fluids to a platform via a diesel line and a jumper hose. As previously noted, this is not a tactic contained in the CISPRI Technical Manual or the STAR Field Guide. Please clarify the tactic and that all CISPRI personnel and that all Class 1 contract vessels have the appropriate training and experience to accomplish this tactic.

Scenario 4- Swanson River Oil Pipeline Rupture in Summer

Table 1-22 should specify the month in which the scenario occurs.

Table 1-23

(ii) Preventing or Controlling Fire Hazards indicates that response personnel are on scene with fire extinguishers and/or pumps and hoses to pump water from Bishop Creek south of the rupture to suppress the threat of a fire or explosion. Please clarify the level of firefighting training response personnel have in order to safely provide fire and explosion suppression and what specific equipment is available to effectively meet those purposes. The discussion of training elsewhere in the plan does not provide this information.

(iv) Surveillance and Tracking Oil; Forecasting Shoreline Contact Point indicates that CISPRI's hand held infrared camera is used during night time operations. It is difficult to establish the usefulness of this asset in this scenario since summer ambient light should allow approximately 18-20 hours of daylight. However, the scenario conditions did not stipulate which summer month the spill occurs. Clarify the summer month of the spill to best evaluate the usefulness of a hand held infrared camera.

(v) Protection of Environmentally Sensitive Areas and Areas of Public Concern-identifies Swanson River as an anadromous stream referencing GRS CCI-22 to be initiated. While it is appropriate to initiate nearby GRS, Table 1-22- Scenario Conditions indicates that no oil reaches Cook Inlet. Additionally the receiving environment (Bishop Creek) is also an anadromous stream. Likewise, it would be appropriate to focus on the area affected and prevent further spread to other sensitive areas like Swanson River. Recommend identifying Bishop Creek as an anadromous stream to alert responders to the sensitivity of the receiving environment.

(vi) Spill Containment and Control Actions and (vii) Spill Recovery Procedures indicates that by Hour 2, a staging area and command post are set up at the Swanson River Field (SRF) and the CISPRI Swanson River response equipment cache is mobilized. While SRF has the assets to host a command post and while there is a CISPRI response equipment cache pre-staged at SRF, it seems more prudent to set up the command center at CISPRI headquarters in Nikiski and use the equipment cache there, since it is approximately 12 minutes from the Bishop Creek spill location rather than the 1-hour travel time from SRF. Please clarify the reason to set up a command post and shuttle equipment from SRF to Nikiski.

Task Force 1 - Containment indicates the use of a jon boat to travel 5 creek miles north of the rupture. Please verify that Bishop Creek is deep enough and wide enough in that location to support travel by jon boat.

Task Force 1 - Containment also indicates that collected oil will be helicoptered to SRF. Since the spill location is accessible by road, it would be safer to transport collected oil via road to KPL or Tesoro. Please clarify the decision to transport oil via helicopter to SRF.

Additionally this section references the Sterling Highway crossing the creek at approximately 7.5 miles downstream of the rupture. We recommend verifying this location versus the Kenai Spur Highway crossing the creek.

1.7 Non-mechanical Response

This section provides some discussion of the basis for determining when in-situ burning and dispersants may be used, as required at 18 AAC 75.425(e)(1)(G). However, we suggest that the criteria (i.e., slick thickness for in-situ burning) and conditions described in the In Situ Burning Guidelines for Alaska and Oil Dispersant Guidelines, both included in Annex F of the Unified Plan, should be added here.

1.8 Facility Diagrams

Facility diagrams are intended to be useful for a response, as required at 18 AAC 75.425(e)(1)(H). We offer the following feedback on the figures provided:

- Anna Platform
 - Drawing A_A-0002 (page 291), under "NOTES" indicates, "Emergency Equipment Locations: 2/92". What constitutes "emergency equipment"? Where is 2/92 on drawing?
 - Drawing A_A-0002 (page 291): Under "Safety Legend" where are corresponding numbers/locations on drawing?
 - Why was the staffing detail removed?

-
- Beaver Creek
 - Page 282 (C-1): Why was specific staffing information removed?
 - Facility diagrams (pages 295-296) are of low quality. Not sufficient detail to be useful as a reference in response. Is this due to electronic file size reduction? Are images in plan hi-res?
 - MGS Onshore Facility
 - Facility diagram (page 326) are of low quality. Not sufficient detail to be useful as a reference in response. Is this due to electronic file size reduction?
 - Platform A
 - Figure 11a, 11e “drawings” (pages 331 and 335) not useful as a reference for response.
 - Pink color used for drawings (Figures 11b-d) should be changed, as it is the same color as primary evacuation routes (which are missing) according to drawing legend.
 - Platform C
 - Figure 12a and 12e “drawings” (pg 336, 340) not useful as a reference for response.
 - Pink color used for drawings (Figures 12b-d) should be changed, as they are same color as primary evacuation routes (which are absent) according to drawing legend.
 - Swanson River Field Units
 - Drawings and images (Figures 14b-f) do not include topography. Legends include surface flow direction icons but do not include icons on the images.

2.0 Prevention Plan

2.1 Prevention, Inspection, and Maintenance Programs

Section 2.1.1, Prevention Training Programs, states that, “HAK personnel with training duties ... participate in a spill prevention training program.” Personnel requiring training may not have training duties themselves. Please clarify this statement.

Section 2.1.1 is missing substantial information, including:

- Job positions and job duties (for those involved with inspection, maintenance, or operation of oil storage and transfer equipment), as required at 18 AAC 75.020(1).
- Licenses, certifications, and prerequisites associated with job positions mentioned above, as required at 18 AAC 75.020(2)
- Training schedules, topics, and frequency as required at 18 AAC 75.020(3)
- Most of the training-related information described in the ADEC Guidelines, including the minimum requirements for the plan: job descriptions with duties that may affect the risk or size of a spill and the training required for such positions.

Section 2.1.3, Medical Monitoring, states, “Field employees are enrolled in medical surveillance programs to assess their potential to be a first responder. HAK’s program includes HAZWOPER, respiratory protection, and hearing conservation.” It appears that this program focuses on safety during a response, not ensuring that personnel are medically fit to do their job as required at 18 AAC 75.007(e). ADEC Guidelines suggest that this should involve a list of the positions requiring medical testing, physical conditions screened for, and the methods and frequency of medical testing or monitoring. Recommend providing this information.

Section 2.1.4 describes Security Programs. This section includes the same information that was provided in a plan amendment last summer regarding a change in staffing at the Beaver Creek facility. The facility is no longer manned 24 hours/day, but a minimum of 12 hours/day. CIRCAC remains convinced that the absence of personnel for hours at a time jeopardizes the prompt detection of a spill (or potential spill) and site security. It is not clear how a vacant, unfenced facility with lights on but no surveillance will meet the intent at 18 AAC 75.007(f) of providing “security measures and surveillance appropriate to each component of the operation to minimize the risk of vandalism, sabotage, or unauthorized entry.”

Section 2.1.5 describes Fluid Transfer Procedures in a general way, but references the fact that HAK Standard Operating Procedures are used without describing what these entail. The section essentially reiterates the regulations at 18 AAC 75.025 without providing sufficient information to confirm compliance. At minimum, the following should be added:

- Describe *how* clear communications will be maintained, as required at 18 AAC 75.025(d).
- Describe how a transfer could be stopped at any time, consistent with the best commercially available technology, as required at 18 AAC 75.025(e).
- Ensure that above-ground piping will be checked before and during each transfer, or monthly, whichever is more frequent, as required at 18 AAC 75.025(h). Please confirm that this applies to the onshore facilities included, and add the required information.

The above information should be provided separately for the different onshore and offshore facilities to the extent that variations in procedures or equipment exist.

Section 2.1.8 describes Leak Detection, Monitoring, and Operating Requirements for Crude Oil Transmission Pipelines, focusing on the pipeline between Swanson River Field and the KPL Terminal. It does not describe how the flow could be stopped within an hour of discharge detection as required at 18 AAC 75.055.

Section 2.1.8 also references the Harvest Control Room. Please verify what this is as it has not been previously identified as part of the facilities involved.

2.2 Discharge History

This section does not provide any analysis or summary regarding spill frequency, size, or cause, as required at 18 AAC 75.425(3)(2)(B). Language describing HAK efforts to share information about spills internally, investigate causes, and sharing lessons learned from spills with employees was removed. Recommend that this language and the efforts described should be reinstated.

2.3 Potential Discharge Analysis

This section is required at 18 AAC 75.425(e)(2)(C) to analyze potential discharges, including size, frequency, cause, duration, location, and mitigation/prevention actions. It is instead a simple list of one possible cause of a spill from each type of facility. Recommend providing additional information to meet the regulatory requirements and ADEC Guidelines.

2.4 Conditions Increasing Risk of Discharge

This section states that it may be difficult for workboats to transfer fuel to the platform due to ice conditions, and states that platforms are sited away from established shipping lanes and procedures are in place to guide safe fuel transfers and limit activity when conditions are deemed unsuitable. While the latter sounds prudent, the relationship between ice conditions and shipping lanes requires clarification.

3.0 Supplemental Information

3.2 Receiving Environment

As required, Section 3.2.2 discusses the percentage of the response planning standard (RPS) volume that could reach open water for each facility, as required at 18 AAC 75.425(e)(3)(B). We suggest that the planholder should reconsider the statement that a zero percent of a spill from the Swanson River Oil Pipeline would reach Cook Inlet. This contradicts earlier statements in this section of the plan. Although the response planning standard (RPS) has been significantly reduced, it appears that a spill below Swanson River, Daniels Creek, and Bishop Creek could potentially reach Cook Inlet as acknowledged in Table 3-2. Furthermore, Section 5.3 identifies a rupture at Bishop Creek as the largest oil discharge possible for this crude oil pipeline. With an estimated time from detection to shut down at 20 minutes and a flow rate of 180 bbl/hr, providing an adjusted RPS of 188 bbls of oil to flow into Bishop Creek just a few miles from the Inlet.

In this section, the plan has been changed to assume that 25 percent of oil from storage tanks could overtop secondary containment, as opposed to the previous assumption of 40 percent. Please justify this changed assumption.

Finally, it is unclear why maps are shown of all Geographic Response Strategies in Central Cook Inlet. Suggest that these may be removed or relocated to Section 3.10.

3.4 Realistic Maximum Response Operating Limits

This section references several sources for wind data i.e. CISPRI Technical Manual and NOAA. Please clarify the source or sources of the data compiled in table 3-3.

Section 3.4.2 describes measures to reduce risk when conditions exceed response operating limits. The first item listed states that fuel transfers to platforms are conducted

following USCG-approved procedures. We assume that transfers *always* follow USCG-approved procedures. Recommend providing a copy of the transfer procedures or a link to those procedures.

This section also states that waves of 6-feet would cause limitation of mobile drill ship activities. There is no mobile drill ship included in this plan. Please clarify this reference or remove the statement.

This section does not address the limits to non-mechanical response. Please discuss if non-mechanical response will be considered, as has been stated in Section 1.7. Non-mechanical response options are listed as an option with the implication that they would be used if conditions did not allow mechanical recovery. However, in-situ burning and dispersant application are also subject to limitations due to visibility, ice, wind, waves, and other factors.

Finally, we suggest that this section only partially addresses the regulatory requirement at 18 AAC 75.425(e)(3)(D) to estimate the percentage of time that response would be ineffective due to weather. There is one estimate for wind conditions (location from which data are taken is unclear), and a mention of sea ice in Trading Bay reaching 90-100% concentration for approximately 50% of the “winter season.” Additional information should be added to address all environmental factors and the various locations of facilities covered by this plan.

3.5 Logistics

This section, as written relies entirely upon the CISPRI Technical Manual (CTM). While the CTM is a valuable cache of information; providing tactical direction and guidance it does not fulfill all of the requirements set out in AAC 18 75.425 (e)(3)(E). Or as referenced in the ADEC Oil Discharge Prevention and Contingency Plan Application Package Review Guidance Document; which identifies in particular, Maintenance Procedures - for maintaining and repairing transportation and logistical support equipment as necessary to maintain readiness and ability to continue operations for the duration of the response. Maintenance schedules for major pieces of logistical support equipment.

3.7 Non-mechanical Response Information

Please provide a completed application for in-situ burning, as required at 18 AAC 75.445(h).

Please also describe the specific mechanisms in place to assess environmental consequences and monitoring, as required at 18 AAC 75.425(e)(3)(G).

3.9 Response Training and Drills

Please provide information indicating that response training records maintained for at least 5 years as required at 18 AAC 75.445(j).

It is not clear from this section what training is provided by CISPRI or HAK. For training provided by HAK, the section should reference previous discussion of maintaining training records internally if this also applies to spill response training.

This section used to have a table indicating the number of response-trained HAK personnel at each facility, but it has been removed. Particularly on the platforms and in remote locations, having trained personnel on-scene is crucial to a successful response by ensuring first aid to the scene is conducted safely and appropriately. We request that this information be added back to the plan to allow reasonable evaluation of response capabilities on those facilities.

3.10 Protection of Environmentally Sensitive Areas and Areas of Public Concern

This section identifies the Environmental Sensitivity Index (ESI) maps, Cook Inlet GRS, and Cook Inlet Subarea Contingency Plan as resources identifying sensitive areas. However, it does not include any prediction of discharge movement and sites affected, effect of seasonal considerations, discussion of toxicity and persistence based on the products that could be spilled, or identify priority areas (aside from mentioning the above-listed resources). All of these are required by 18 AAC 75.425(e)(3)(J) and should be added.