

"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 3, 2016

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City of Kenai

City of Seldovia

City of Homer

Kodiak Island Borough

Kenai Peninsula Borough

Municipality of Anchorage

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

SUBJECT: Comments on Cook Inlet Energy Oil Discharge Prevention and Contingency Plan, for Cook Inlet Area Production Operations (Plan No.12-CP-2016, Rev. 8)

Dear Mr. Evans:

Cook Inlet Regional Citizens Advisory Council (RCAC) has reviewed the proposed amendment to the Cook Inlet Energy Oil Discharge Prevention and Contingency Plan (C-plan) for the Cook Inlet Area Production Operations 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 crude oil facility operations in Cook Inlet.

This plan was amended to incorporate *exploration* operations at the Sabre site using the Spartan 151 jack-up drilling rig. We provide some comments for your consideration based primarily on the incorporation of this new activity into Cook Inlet Energy's already extensive operations both on and off shore in the West Forelands area.

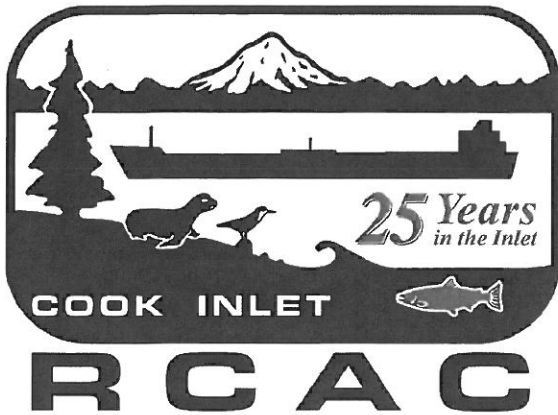
Overall the plan is well written and was significantly improved during the previous review process. Our comments primarily focus on ensuring the seamless incorporation of the Sabre operations. More significantly though, we suggest that the plan should provide a firm end date (or conditions) for drilling operations with the jack-up rig; in line with previously established end dates (31 October) for jack-up rig operations. Additionally, we respectfully request that the response scenario for this site to be resubmitted in full. Currently, the response scenario relies extensively on information based on a blowout at the Osprey Platform, which was not submitted as part of the amendment and could also benefit from updating.

If you have any questions or wish to discuss this further, please contact my Director of Operations, Vinnie Catalano at (907) 283-7222 or via email at SteveCatalano@circac.org.

Sincerely,


Michael Munger
Executive Director

Cc: Graham Wood



Comments and Requests for Additional Information

Regarding

Cook Inlet Energy

Cook Inlet Area Production Operations

Oil Discharge Prevention and Contingency Plan

Submitted

By

COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL

JUNE 3, 2016

Introduction

This plan amendment modifies the existing contingency plan for production operations to include exploration operations and the use of a jack-up rig at the Sabre site north of the West Forelands. Other existing onshore and offshore facilities remain in the plan.

The Introduction mentions that Sabre exploration operations are “scheduled for summer 2017.” If these operations have a firm conclusion within the season, we suggest this should be clarified and an exact date or conditions set for the conclusion of operations well in advance of the expected presence of sea ice in Cook Inlet. The end of planned operations should take into consideration the established date to end drilling operations for jack-up rigs in Cook Inlet (i.e., October 31).

1.0 Response Action Plan

1.1 Emergency Action Checklist

Figure 1.1-1 Initial Phone Tree

This section references MSD Homer for spill notification. We recommend using the National Response Center number (as listed) along with the U.S. Coast Guard’s 24-hour emergency contact number in Anchorage for spill notification instead of the phone number for MSD Homer.

1.2 Reporting and Notification

Table 1.2-2 Agency Notification chart

We recommend updating the Alaska Department of Environmental Conservation contact per the reorganization.

Additionally, we appreciate that the Cook Inlet RCAC is included on the list. We request that the RCAC be notified of any *reportable* spill, regardless of size (the list specifies RCAC notification for any spill larger than 55 gallons).

Figure 1.2-1 CIE Incident Command Organization

Although not included in the amendment, this figure would benefit from adding the Unified Command composition, when the Unified Command is warranted, as it is otherwise lost from the plan with the removal of Figure 3.3-1.

1.6 Response Scenarios

1.6.13.7 Offshore Platform Blowout – Osprey Platform

In the description of the Summer event, it is noted that a response organization sufficient to respond to this spill will be activated. We request confirmation that this 1,500 bbl/day spill from a Cook Inlet platform would warrant CISPRI activation.

Figures 1.6-6 and 1.6-7 show the spill trajectory for the Osprey platform scenario. We suggest that the format used for the latter figure provides a fuller picture of the sensitive areas that may be impacted and this should be used for both. We also note that the conditions for the winter scenario included in the figure and those included in the scenario description are different, and suggest clarifying the wind speed and wind direction used. *These figures were included in the amendment, but appear to refer to the Osprey scenario only – please clarify and provide trajectory maps for the Sabre site as warranted. They are otherwise missing.*

Table 1.6-32 (not amended but referenced in the amended language) should be updated to use correct CISPRI tactic references. Several related to both open water and nearshore operations are incorrect as compared to the August 2015 CISPRI Technical Manual.

1.6.13.8 Sabre Well Scenario - Blowout

The scenario for the Sabre location almost wholly relies on referencing information for the Osprey Platform scenario, which was not included with the amendment. Without formal submittal of the material incorporated by reference, it is difficult to fully evaluate the scenario for the Sabre site, and raises concerns about the Osprey Platform scenario as well in light of the errors (or updates needed) in Table 1.6-32.

We strongly suggest that the Osprey and Sabre scenarios should be updated and resubmitted in whole. In addition to changes needed to CISPRI Technical Manual references, we would like to understand which vessels would be called upon (realizing that CISPRI has recently removed one of its oil spill response vessels from service), and which barges would be used, what assumptions are being used as far as seasonal access and location of resources. Without this, it is very difficult to use the scenarios to illustrate how the response planning standard for a spill to Cook Inlet waters would be achieved.

1.7 Non-Mechanical Response Options

1.7.3 In Situ Burning

Information in this section remains inconsistent with In Situ Burning Guidelines for Alaska regarding oil emulsification. Please revise for consistency.

Information regarding dispersant application guidelines for Alaska should be also updated to be consistent with the recently revised guidelines in Annex F of the Unified Plan.

2.0 Prevention Plan

2.1 Prevention Programs

2.1.6 Transfer Procedures

Table 2.1-1 adds the Sabre facility to the list of facilities at which transfers occur, but all information is listed as "TBD." This information should be available to be added to the plan, as the Spartan 151 rig's structure is fixed and the rig is merely changing location.

2.1.7 Well Control

This section indicates that tubulars, wellhead assembly, and other equipment will be needed for well control. We suggest clarifying whether this equipment is in Alaska or elsewhere.

2.1.8 Oil Storage Tanks

Table 2.1-3 adds tanks for both diesel fuel and drilling muds to the Sabre site. Please clarify if the Spartan 151 will rely on portable test tanks, and incorporate this or other pertinent information into Table 2.1-1, which lists transfer points at different facilities.

A description of storage tanks at the Sabre site was added to this section. We suggest adding more details regarding the types of alarms, indicators, and thresholds applicable to these tanks to mirror the excellent level of detail provided for the Osprey Platform and Kustatan Production Facility.

3.0 Supplemental Information

3.1 Facility Description and Operational Overview

3.1.6 Drilling Operations

This section states that drilling at the Sabre site will begin in summer 2016, which is contradictory to the other plan statements that it will begin in 2017. Please revise as appropriate for consistency.

Figure 3.1-9 Profile view of the Spartan 151

While this figure does show a profile of the *Spartan 151* jack-up rig it lacks the detail provided in the facility description and general plan view for the Osprey platform. We recommend providing a more detailed diagram for the *Spartan 151*.

3.4 Realistic Maximum Response Operating Limitations

3.4.4 Summary of Limiting Conditions

Please also describe the measures taken by Cook Inlet Energy to reduce the risk of oil spills or compensate for reduced response options in the event of a spill during periods of adverse conditions (including sea state and extreme cold temperatures) when their ability to effectively respond to an oil spill would be limited, as required at 18 AAC 75.425(e)(3)(D).

3.6 Response Equipment

The introduction to Section 3.6 still references Chevron; please clarify ownership of equipment that is available through a rental agreement at the Trading Bay Production Facility.

Table 3.6-4 Spartan 151 Onboard Spill Response Equipment

Section 1.5.1 indicates that facility personnel and on-site equipment will be used for the initial response actions. This inventory should include items such as drain plugs/blockers, diking material, and sufficient sorbent materials. Safety-related equipment such as the detectors listed on site at the Osprey Platform (Table 3.6-3) should also be on site at the Sabre site and listed here.

3.10 Protection of Environmentally Sensitive Areas

We appreciate the reference to Cook Inlet RCAC's work on trajectory modeling in Cook Inlet, and suggest that section could also reference the Cook Inlet Response Tool (CIRT). The CIRT provides a ready reference to Geographic Response Strategy locations, other data and imagery useful for determining site sensitivity, and current and other oceanographic conditions. It is available at <http://portal.aos.org/cirt.php>