



"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."

September 16, 2014

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. 11-CP-5115 (Major Amendment)

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. 11-CP-5115 (Major Amendment) 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 amendment to be well-written and clear. It provides updated information, primarily in one appendix, related to the expansion of onshore drilling at locations north of Cook Inlet. The following RFAI relate to relatively minor, yet still important, issues.

City of Kodiak

RFAI #1: Ensure resources available for monitoring of discharge

City of Kenai

The plan scenarios describe the projected plume that would result from a well blow-out, but do not describe, as required in 18 AAC 75.445(d)(3) the tactics and resources that would be used to ensure that all of the spilled oil would be located. This is important given that oil may be concealed under topsoil or fresh snowfall, and would be applicable to both a blowout or a leak from a storage tank. Appropriate tactics are available in the STAR Manual, which has been referenced elsewhere in this amendment. *RFAI: Please add information as required at 18 AAC 75.445(d)(3) to describe the tactics and resources used to monitor discharge.*

City of Seldovia

City of Homer

Kodiak Island Borough

RFAI #2: Facility diagrams show muster areas and caches of response equipment

Kenai Peninsula Borough

The facility diagrams are clear and easy to read but do not show the locations where response equipment (mentioned in the amendment) will be located as required at 18 AAC 75.425(3)(1)(H). In addition, these diagrams should show expected muster areas for personnel safety. *RFAI: Please add information on the location of response caches and muster areas at each drilling location.*

Municipality of Anchorage

RFAI #3: Protection of water resources

While we agree that it is unlikely that a discharge from these facilities will affect a nearby pond or stream, as acknowledged in the plan this remains a possibility. We appreciate that, “any lakes or rivers down gradient from the drilling pads would be given priority consideration for recovery and cleanup efforts” (Section D.2), however we suggest that the tactics and resources that would be used should be specified in the plan. While the scenarios in the applicable appendix do not conceive of oil reaching water, the main body of the plan refers to CISPRI equipment and tactics, not Alaska Chadux, who will respond to a spill in the area covered by the proposed amendment area. *RFAI: Please describe how sensitive water or wetlands will be protected and cleaned up if threatened, as required at 18 AAC 75.425(e)(3)(A). Please also complete the missing words in Section 3.2 (currently “xxx.”)*

RFAI #4: Consider Realistic Maximum Response Operating Limits

The applicable appendix that is the focus of this amendment does not include a discussion of realistic maximum response operating limits (RMROL). This is required at 18 AAC 75.425(e)(3)(D). As the main plan refers only to CISPRI’s Technical Manual when discussing RMROL while these operations would be implemented by Alaska Chadux, we suggest that some discussion of the impact of winter conditions, in particular, on site access and response operations is warranted. *RFAI: Please add discussion of RMROL for these remote, onshore sites.*

RFAI #5: Reference Cook Inlet Response Tool

Finally, we suggest that the Cook Inlet Response Tool should be included in the C-plan as a valuable reference for any spills occurring on, or near, Cook Inlet. The tool can be found at: <http://portal.aos.org/cirt.php>. *RFAI: Please add a reference to the Cook Inlet Response Tool in Section 1.6.5 Protection of Sensitive Areas, which applies to all Cook Inlet Energy, LLC operations covered by this plan.*

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