



"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

July 27, 2021

Tourism Organizations

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

Alaska Native Groups

Environmental Groups

SUBJECT: Comments on RFAI response regarding Hilcorp Alaska, LLC Oil Discharge Prevention and Contingency Plan for Cook Inlet Exploration Facilities. ADEC Plan Number 17-CP-5216. Amendment Application (Revision 6)

Recreational Groups

Dear Mr. Evans:

Aquaculture Associations

Cook Inlet Regional Citizens Advisory Council (CIRCAC) submits these comments on the latest major amendment Hilcorp Alaska, LLC Oil Discharge Prevention and Contingency Plan (ODPCP) submitted by Hilcorp Alaska, LLC on June 21, 2021. 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.

Commercial Fishing Organizations

This plan amendment consists of the addition of the K-pad location on the west side of Cook Inlet within the Beluga River Unit.

City of Kodiak

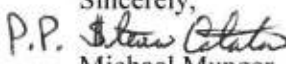
Our enclosed comments identify areas for improvement and recommendations for clarification in the plan sections modified as part of the amendment (parts of the overall plan that were referenced in the amended pages required review to verify the amended sections). If you have any questions or wish to discuss this further, you may contact our Director of Operations at (907) 283-7222 or via email at SteveCatalano@circac.org or I can be reached at the number listed or via email at MikeMunger@circac.org

City of Kenai

City of Seldovia

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

City of Homer

Sincerely,
P.P. 
Michael Munger
Executive Director

Kodiak Island Borough

Cc: Graham Wood
Commissioner Jason Brune

Kenai Peninsula Borough

Municipality of Anchorage

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Comments and Requests for Additional Information

Regarding

**Hilcorp Alaska, LLC Oil Discharge Prevention and Contingency
Plan for Cook Inlet Exploration Facilities. ADEC Plan Number 17-
CP-5216. Amendment Application**

(Revision 6)

Submitted

By

COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL

JULY 27, 2021

PART 1. RESPONSE ACTION PLAN

1.6 RESPONSE SCENARIOS AND STRATEGIES

1.6.2 Response Scenarios

Scenario 9 - K-Pad Exploration Well Blowout During Summer

Table 1-46 Page 1-97 In Table 1-46, the Wind Direction Parameter Conditions indicates that, "Wind direction data was retrieved from Homer Municipal Airport. See Figure 1-6." Figure 1-6 in the plan is the Homer Wind Rose for typical summer conditions. However, under Trajectory, it indicates that the Kenai summer wind rose is shown in Figure 1-6 (it is actually Figure 1-5). Figure D-39 shows NNE, NE and SSW as summer plume trajectories. However, if the Kenai Wind Rose is being used, predominant wind for the purposes of the scenario should be NNE, SSW, and SW (greater than 10%) vice NNE, NE, and SSW.

RFAI: Please clarify/correct Homer and Kenai wind rose references and adjust the scenario and Figure D-39 to account for predominant NNE, SSW, and SW winds. Based on the Beluga Unit/K-pad location relative to Kenai and Homer, Kenai winds should be used for this scenario instead of Homer. Homer winds would be appropriate for southern Kenai Peninsula locations but not sites located in this area on the western side of Cook Inlet.

Table 1-47 Page 1-98 In this amended K-Pad scenario (and other scenarios in the main plan) Table 1-47 at (vi) and (vii) specifically indicates where berms are to be constructed around the exploration pad. This K-Pad scenario however, only indicates that TF-1 "has begun building the berm..." with no indication as to berm placement and configuration relative to the pad. Other scenarios in the main plan document have much more descriptive language regarding berm construction and configuration (with the Greystone and Seaview pads having permanent berms and their corresponding scenarios providing more descriptive language as to placement, reinforcement and construction).

RFAI: Please consider updating this scenario to include more detailed information relative to berm construction at K-Pad.

Table 1-48 Column J - indicates a 3rd footnote yet there is no #3 footnote included.

RFAI: Please update the footnotes for this table.

2.1 DISCHARGE PREVENTION, INSPECTION AND MAINTENANCE PROGRAMS

2.1.4 Security Programs

No physical security measures are in place at K-Pad and the pad is not fenced-in. HAK only indicates that the "facility is not readily accessible by the public." Paragraph 3 indicates that "the facilities are staffed 24 hours per day and security monitoring is accomplished by field personnel during their normal daily activities." Unless there are personnel active on the facility during an entire 24-hour period, adequate monitoring can't take place and doesn't minimize the risk of vandalism or sabotage during periods when personnel aren't actively monitoring the facility. Regardless of its remoteness, or more appropriately because of its remoteness, more substantial security measures appropriate to each component of the operation should be implemented at this site in accordance with 18 AAC 75.007(f). For the Greystone Pad Area, Section 2.1.4 (referencing the entire plan document) indicates that, "Greystone is not fenced or gated, but does have a permanent berm surrounding the pad. Signs will be posted at the entrance requiring authorized entry only. Access to the site must be pre-approved."

RFAI: Please consider adding more substantial wording to describe security measures at K-Pad, similar to language used to describe security measures for HAK production facilities on the west side of Cook Inlet to provide continuity between plans.