



"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."

August 9, 2018

Mike Evans
Alaska Department of Environmental Conservation
555 Cordova St.
Anchorage, AK 99501-2617

SUBJECT: Comments on Hilcorp Operations Alaska, LLC (HAK) ODPCP for Cook Inlet Exploration Program (#17-CP-5216) – RFAI #2

To whom it may concern:

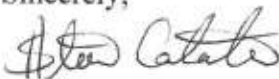
Cook Inlet Regional Citizens Advisory Council (CIRCAC) submits the attached comments regarding the response to Requests for Additional Information (RFAI) released for public comment on August 2, 2018 on the Hilcorp Operations Alaska, LLC ODPCP for Cook Inlet Exploration Program.

We appreciate ADEC's and the plan holders' consideration of our previous comments on this plan and raise the following two items for further consideration.

- **Proximity of the pad site to the Anchor River warrants reconsideration (RFAI #1).** As several commenters noted, the proximity of the pad to an important anadromous fish stream warrants careful consideration. We appreciate that pad location is determined through the permitting process. *If the pad development proceeds at the current location, additional response mitigation measures are clearly warranted. If this location is permitted, CIRCAC requests additional allocation of on-site resources to be available for immediate deployment to protect the river in the event of a blowout.*
- **Blowout plume remains unrealistic (RFAI #4).** We appreciate the additional information regarding the predicted blowout plume over 15 days. However, it seems unlikely that three concise V-shaped plumes would result - even if the wind shifts direction. It seems more likely that a wider swath of land would be affected due to wind direction changes as more than 85,000 bbl of oil is spread around the area. *Please consider revising the description of the plume trajectory and cleanup measures.*

As always, I can be reached at (907) 283-7222 or MikeMunger@circac.org.

Sincerely,

P.P. 

Michael Munger
Executive Director

Cc: Graham Wood

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