



*"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**

*Alaska State Chamber of Commerce*

*Alaska Native Groups*

*Environmental Groups*

*Recreational Groups*

*Aquaculture Associations*

*Fishing Organizations*

*City of Kodiak*

*City of Kenai*

*City of Seldovia*

*City of Homer*

*Kodiak Island Borough*

*Kenai Peninsula Borough*

*Municipality of Anchorage*

November 14, 2017

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

SUBJECT: Comments on Hilcorp Operations Alaska, LLC (HAK), Oil Discharge Prevention and Contingency Plan, (ODPCP or C-plan) for Cook Inlet Exploration Program (Plan No. 17-CP-5216); Renewal

Dear Mr. Evans:

Cook Inlet Regional Citizens Advisory Council (CIRCAC) submits the attached comments and Requests for Additional Information (RAI) on the Hilcorp Operations Alaska, LLC (HAK), Oil Discharge Prevention and Contingency Plan (C-plan) Renewal for the Cook Inlet Exploration Program on behalf of our member entities. The mission of the CIRCAC is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and crude oil facility operations in Cook Inlet.

The clarity and utility of the plan would benefit from a careful review to ensure that section, figure, and table numbering is correct and aligns with the table of contents. The enclosed document also requests clarification or correction on those and other issues throughout the plan.

CIRCAC 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](mailto:MikeMunger@circac.org).

Sincerely,

  
Michael Munger  
Executive Director

Cc: Graham Wood





**Comments and Requests for Additional Information**

**Regarding**

**Hilcorp Alaska, LLC  
Cook Inlet Exploration Program  
Oil Discharge Prevention and Contingency Plan  
(17-CP-5216)**

**Submitted**

**By**

**COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL**

**NOVEMBER 14, 2017**

## General Comments

Hilcorp Operations Alaska, LLC (HAK) plans a regional, multi-year exploration program to explore for oil and natural gas at multiple sites within 5 units that extend approximately 57 miles along the Cook Inlet from Kenai to Anchor Point.

### General Front Matter & Introduction

The Table of Contents correctly identifies Sections 1.1 through 1.9 but plan itself is incorrect as Section 1.6 (numbering) is repeated. Section 1.7 is incorrectly marked as Section 1.6 and Sections 1.8 and 1.9 are also incorrectly marked as 1.7 and 1.8 respectively. Please ensure numbering of figures, tables, and sections is corrected throughout the plan.

### 1.0 Response Action Plan

#### 1.1 Emergency Action Checklist

Table 1-1 and Figure 1-1 both indicate that the “EHS representative” is the first person to be notified (when someone detects a spill) and that the EHS rep “is the primary person making the initial notifications.” A new footnote in Figure 1-1 then indicates, “the EHS representative numbers are in Table 1-2 under Safety Officer.” This is potentially confusing for plan users. If HAK has made the decision to use the term “EHS representative,” CIRCAC requests that the term be used consistently throughout the plan to ensure the appropriate personnel are identified as implied in Table 1-2. If, however, the term is not interchangeable and may include separate positions, that distinction should be clearly explained and used separately and conspicuously different to avoid confusion.

#### 1.4 Communications

Section 1.4.1 indicates, “A summary of communication equipment for each facility, selected telephone numbers, and radio frequencies is provided in Appendix A.” We did not find this information as referenced. CIRCAC recommends updating this section to comply with 18 AAC 75.425(e)(1)(D).

#### 1.5 Deployment Strategies

While much has been added to this section since the last revision/review, it lacks details regarding the interim actions that the operator will perform until the response contractor initiates full response actions. CIRCAC recommends updating this section to include all information required at 18 AAC 75.425 (e)(1)(E)(ii).

## Section: 1.6 Response Strategies (scenarios)

### Scenario 1

- Table 1-6 has been edited with an increased spill quantity of 12,888 gallons. (The RPS from the previous plan version was 10,000 gal.) Please ensure that this update is made throughout the scenario; we noted that it was missing from the first row in Table 1-7, which identifies the spill volume at 10,000 gal. (The “Surface and Trajectory” section does indicate that 12,888 gallons escapes the containment and that “the majority of he 12,888 gallons flows onto the gravel pad and the surrounding lands.”)
- Table 1-8: TF-2 (first row) shows 2 vac trucks with 30 boph recovery rate and 80 bbls capacity. Oil recovery capacity appears to be miscalculated as it uses the vac trucks’ capacity rather than recovery rate. Oil recovery capacity should be 660 bbl, not 1,760 bopd. Please check these figures and adjust as appropriate.

### Scenario 2

- Table 1-11 under Trajectory incorrectly lists Figure B-18 in Appendix B as depicting the predicted oil plume for an oil blowout at the Susan Dionne pad. Figure B-18 is the Site Plan for the Kenai Unit. The Susan Dionne blowout plume is depicted in Figure B-40.
- Table 1-12, row (ii) indicates, “security blocks traffic on Sterling Highway...” While Hilcorp security may block traffic on Sterling Highway, they should also immediately notify Alaska State Troopers to assume control. The plan should identify the Alaska Department of Transportation (AKDOT) as the jurisdictional authority for road closure. Please include procedures to notify and request assistance from Alaska State Troopers and AKDOT.
- Table 1-12 row (v) incorrectly references Figure B-20 as depicting blowout plumes for Susan Dionne pad. B-20 is surface water flow diagram. Blowout plume diagram for Susan Dionne is Figure B-40. Please revise Table 1-12.
- Table 1-12 row vii contains the first reference to “portable storage tanks” for spill recovery. It is unclear if they are referring to shop fabricated tanks or some other portable storage tanks. There is no clear indication of how many portable storage tanks are available in total or available at any one pad, nor is it clear how long it will take to re-locate these portable tanks from one facility to the next (if they are not available at each site). References are made to Appendix C containing additional info on portable storage tanks but this term is not used to describe any of the tanks, so it is difficult to determine which ones are to be used for this purpose. Later references are also made to having total portable storage tank capacity of 1500 bbl (Tables 1-13 and 1-18) but again, without these tanks being specifically identified, there is no way to tell how this total storage capacity was reached.

### Scenarios 3-7

- Please check and, as appropriate, adjust figure references, including:
  - (*Scenario 3*) In Table 1-16 under Trajectory row, Figure B-17 in Appendix B is incorrectly referenced as the predicted oil plume depiction. Correct figure is B-39.

- (Scenario 3) In Table 1-17, row (v), Figure B-19 in Appendix B is incorrectly referenced as the predicted blowout plume depiction. Correct figure is B-39.
- (Scenario 4) In Table 1-21 under Trajectory row, Figure B-33 in Appendix B is incorrectly referenced as the predicted oil plume depiction. Correct figure is B-59.
- (Scenario 5) In Table 1-26 under Trajectory row, Figure B-35 in Appendix B is incorrectly referenced as the predicted oil plume depiction. Correct figure is B-61.
- (Scenario 6) In Table 1-31 under Trajectory row, Figure B-53 in Appendix B is incorrectly referenced as the predicted oil plume depiction. Correct figure is B-75.
- (Scenario 7) In Table 1-36 under Trajectory row, Figure B-54 in Appendix B is incorrectly referenced as the predicted oil plume depiction. Correct figure is B-76.

### **Section: 1.7 Non-Mechanical Response Options**

This section is incorrectly marked as Section 1.6. Please correct numbering.

### **Section: 1.8 Facility Descriptions/Diagrams**

This section is incorrectly marked as Section 1.7. While the diagrams in Appendices A and B meet the intent of 18 AAC 75.425(e)(1)(H) when combined, it seems counter to that intent to use two separate diagrams when one could capture all relevant information important to implementing the plan. Please consider amending the diagrams to maximize ease of use.

### **Section: 1.9 Plan Response Scenario for Exploration or Production Facility**

This section is incorrectly marked as Section 1.8. Please correct numbering.

## **2.0 Prevention Plan**

### **Section: 2.1 Discharge Prevention, Inspection, and Maintenance Programs**

Section 2.1.4, Security Programs, indicates that at least one pad is fenced but not gated and one is neither fenced nor gated. While this section does indicate that the pads are manned 24 hours a day, there should be some contingency in place to control access in the event that the pad is not manned (i.e., when operations are not taking place at these facilities). Please clarify what security measures beyond signage are in place to control access to those pads without fencing and gates.

### **Section: 2.5 Discharge Detection**

Section 2.5 (second paragraph) indicates, “The mud pit is fitted with an alarm that sounds when the level of fluid changes by an amount calculated by the drilling engineer as indicative of a potential problem.” This seems to indicate that calculations must be made and programmed into the alarm system before it will function properly. This section also indicates that the drilling rig pit room is also manned 24-hours a day during drilling operations but still doesn’t seem practical to have an alarm system that must first be programmed to operate. Please clarify how and when fluid level/alarm trigger calculations are made.

### **3.0 Supplemental Information**

#### **Section: 3.4 RMROL Realistic Maximum Response, Operating Limitations**

In Section 3.4.2, bullet point #7 indicates that CISPRI vessels are capable of breaking ice. While CISPRI’s vessels are ice *capable*, this simply means their hulls are strengthened in particular places to allow the vessel to transit in ice, not that they are equivalent to an ice *breaker* in either design or power. Please clarify how Hilcorp and CISPRI would mitigate potential spill consequences in the event of high ice concentrations during a response.

#### **Section: 3.5 Logistical Support**

This section consists of only one line referring users to the CISPRI Tech Manual. While the CISPRI Tech Manual is a valuable resource, 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. The latter document identifies in particular the importance of addressing maintenance procedures for transportation and logistical support equipment. Please add information to this section according to the regulations and ADEC guidance.

#### **3.7 Non-Mechanical Response Information**

We appreciate Hilcorp’s assertion that if dispersants are approved for use, sampling and monitoring for possible environmental consequences would be implemented. However, the referenced Alaska Dispersant Use Plan referenced (Annex F) describes only the procedures and resources needed to monitor dispersant *effectiveness*, not *effects*. Please clarify what procedures or resources will be used to monitor for potential environmental effects during dispersant application.

#### **3.9 Response Training and Drills**

CIRCAC understands that approximately 12 Hilcorp Alaska employees participate in CISPRI’s Initial Response Team (IRT) program, which we encourage. However, this information is not stipulated in the plan, other than to say that Hilcorp Alaska personnel participate in the IRT program to the extent practical. Please specify how many personnel participate in this valuable program, which serves to expand and reinforce the response personnel base with individuals knowledgeable about different facilities.

### **3.10 Protection of Environmentally Sensitive Areas and Areas of Public Concern**

CIRCAC suggests that this section warrants an additional edit to improve grammar and syntax. Additionally, we request that the plan holder use terms consistent with the CISPRI Tech Manual and/or Spill Tactics for Alaska Responders (STAR) Technical Manual: in this case consider using “cold water deluge flushing” instead of “low-pressure flushing.”

The Cook Inlet Response Tool (CIRT) is not mentioned as a resource for identifying environmentally sensitive areas or areas of public concern. Cook Inlet RCAC recommends incorporating use of the CIRT in both Part 1 and Section 3.10. This provides a more specific Cook Inlet reference than the general Alaska Ocean Observing System website listed.

Chumis Cultural Resource Services no longer has a contract with CISPRI. Instead, ADNRC compiles a list of cultural resources contractors for public use. Please update accordingly.

## **4.0 Best Available Technology Review**

### **4.3 Trajectory Analysis and Forecasts**

Please identify the matrix comparing trajectory analysis and forecast models with the appropriate table number.

Additionally, this matrix should be updated. The CIOSM is outdated and is no longer operational. The matrix also identifies ADIOS2 as a trajectory tool; however, the NOAA website identifies this as a weathering model. We recommend removing it as a trajectory tool and considering use of NOAA’s GNOME model instead for trajectory modeling purposes.

### **4.4 Wildlife Capture, Treatment, and Release**

Please verify the contractual relationships involved in using International Bird Rescue’s (IBR) Anchorage Center via CISPRI. This section states that, “The Anchorage Center is under contract to IBR...” It is not clear with whom exactly CISPRI will contract for use of the Anchorage Center’s services if needed.

## **Appendix B – Additional Figures**

CIRCAC suggests the following minor changes to facilitate use of these figures for planning and response purposes:

- In the Niniilchik Unit Figure B-1 and the Kenai Unit Figure(s) B-15, B-16, the site plans contain symbols that appear to be a derrick and are not shown in legend. Please review and address as appropriate.
- The surface water flow figures do not show the information required at 18 AAC 75.425 (e)(3)(B)(i).
- Figures should include details such as the names of streams, rivers, ponds and lakes to identify and assist in determining if they are potential containment sites.
- In the Greystone overview, we recommend using the same language regarding historical/archaeological sites as in other site overviews. (Currently the Greystone overview states that, “Sites of archeological, cultural, or historical significance have not been publicly identified in the area.” This is always the case, as sites of historical/archaeological importance are not identified or publically solicited.



- Each site plan figure lacks some details, including gradient lines, low points on the pad itself and surrounding areas, and potential natural containment areas, is needed to meet the requirements at 18 AA C75.425 (e)(3)(B)(i).
- Table A-3 Site Specific Information contains valuable information, but is missing information regarding the streams nearest to each pad that could transport hydrocarbons to open water if a spill were to reach them. It is difficult to determine how many streams could be affected from blowout deposition.