



Comments and Requests for Additional Information

Regarding

Hilcorp Alaska, LLC

Cook Inlet Production Facilities

Oil Discharge Prevention and Contingency Plan

Submitted

By

COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL

DECEMBER 16, 2021

General and Front Matter Comments

The Management Approval and Resource Commitment Statement indicates that the necessary equipment, manpower, and materials will be available to respond to a worse-case discharge from Hilcorp's North Slope Production Facilities. However, the Oil Spill Primary Response Action Contractor Registration and the Statement of Contractual Terms only list a contract with CISPRI for Hilcorp's Cook Inlet Production Facilities.

RFAI: Please clarify the commitment to manpower and equipment for a North Slope worse case discharge while contracting for a Cook Inlet response.

The Table of Content has had all US Code of Federal Regulation cites stricken. While some federal regulations may not apply certain others do (e.g. 40 CFR 112.20 Facility Response Plans)

RFAI: Please clarify the reasoning for removal of those cites.

Introduction

The Introduction indicates that all federal oil spill planning requirements have been stricken from the plan yet within the ODPCP Organization it is stated that citations included in section headers identify the state and federal regulations relevant to that section.

RFAI: Please clarify this statement given all mention of federal regulation has been stricken from the plan up to this point.

Figure I-1 Cook Inlet Oil and Gas Production Facilities. The bottom left legend says "ODPDP" vice "ODPCP".

RFAI: All maps and the entire plan should be double checked for spelling/punctuation/grammar errors.

PART 1: RESPONSE ACTION PLAN

1.1 Emergency Action Checklist

Table 1-1 Emergency Action Checklist indicates the first person to detect a spill should immediately notify the EHS representative or the 24 HAK spill phone. The syntax error aside, 18 AAC 75.425 (e)(1)(A) recommends that this summary be duplicated on a wallet-sized card, to be carried by the appropriate response personnel while on duty. We recognized that this may not be the usual practice as electronic devices allow for the intent of this recommendation to be carried out. That said it seems that even though the 24 HAK [sic] spill phone number is also noted in the following Figure 1-1 Spill notification Flow Chart there is no requirement nor recommendation for the Spill Notification Flow

Chart to be carried by response personnel while on duty. Therefore, it seems practical for the 24 (hr.) HAK spill phone number to be included in the Emergency Action Checklist to ensure spill responders have that number easily available as is intended by the recommendations of 18 AAC 75.425 (e)(1)(A).

Additionally, **Table 1-1 and Figure 1-1** (and elsewhere in this section), and specifically footnote 1 in Figure 1-1, indicates that "the EHS representative is the primary person making the initial notifications", then goes on to say that, "The EHS representative numbers are in Table 1-2 under Safety Officer." Further, the title "EHS representative" is only used in Section 1.1. It is unclear why the term EHS representative is used at all if contact lists only list the "Safety Officer" position and why it is only used on Section 1.

RFAI: Please clarify how spill responders meet the recommended intent of 18 AAC 75.425(e)(1)(A). Please also clarify the combined use of the terms EHS representative and Safety Officer to identify the same position, or select one title for use to avoid confusion and communication errors, lapses and/or delays.

Figure 1-1 Spill Notification Flow Chart lists the EHS Representative and the 24-hour HAK spill phone number. However, there is no phone number listed for the EHS Representative. There is a footnote indicating that the EHS Representative numbers are in Table 1-2 under Safety Officer. 18 AAC 75.425 (e)(1)(B) seems to guide the plan holder to provide immediate and easy notification of emergency response personnel for notification of not only emergency responders but state and federal agencies responsible to receive notification of a spill. Likewise, 18 AAC 75.425 (e)(1)(B) is clear in its directions for reporting and notification – to include a description of the immediate spill reporting actions to be taken at any hour of the day, including the title and telephone number of facility personnel responsible for making the notification; and the telephone number of each appropriate government agency to be notified if a discharge occurs;

RFAI: Please include the EHS Representative's phone number(s) in order to meet the direction and intent of 18 AAC 75.425 (e)(1)(B).

1.2 REPORTING AND NOTIFICATION

Section 1.2.3 Qualified Individuals indicates that the Emergency Response Specialist is notified by the 24-hour spill phone and will authorize the response through the QI and name an IC. The identity of the Emergency Response Specialist has not been addressed up to this point. That position has not been listed or identified in the preceding guidance (except for one strikethrough deleting the title). That position or title is not shown on Table 1-2 Incident Command System (ICS) Personnel and Telephone numbers, Figure 1-2 HAK Incident Command Systems Structure, Figure 1-1 Spill Notification Flow Chart, or Table 1-1 Emergency Action Checklist.

RFAI: Please clarify the identity and role of the Emergency Response Specialist.

1.5 DEPLOYMENT STRATEGIES

1.5.2 Transport of Resources indicates that CISPRI's large barges (12,500 and 59,000 bbl capacities) can tie up at Offshore Systems Kenai (OSK), Marathon's Nikiski dock, and Hilcorp's Rig Tenders Marine Terminal, during a spill response. While the Hilcorp Rig Tenders Marine Facility had in the past under different ownership moored various barges, the question remains; has Hilcorp moored a barge at the facility since beginning operations at that facility? Additionally, this section indicates the terminal is staffed to support 24-hour operations *in needed*.

RFAI: Please confirm Hilcorp's capability to moor and manage a barge of the size identified in the plan. Recommend correcting typographic error; "...in needed."

1.5.3 Transporting Equipment and Personnel in Adverse Weather

Table 1-6 Summary of Staging Capabilities in the Cook Inlet Region

The "Nikiski (Rig Tenders)" location information indicates that the Port Facility has a 600 ft. dock face, 10-ft updraft at 0.0 tide, fuel/electricity supplies available year-round. And further on the comments section indicates the range of tide is 20.7 ft. and tidal currents run from 3 to 4 knots. Ice floes in January and February pose a problem. A similar statement is made for the Nikiski/OSK/Arness Dock where it's indicated that ice flows pose a problem due to tidal limitations. Historically the Rig Tenders facility has required dredging to accommodate vessels mooring at most tide ranges, except perhaps minus tides. Additionally, this table appears to list this location as both the "Nikiski (Rig Tenders)" and as the "Rig Tenders Dock.", while Section 1.5.2 appears to list the same location as "Hilcorps Rig Tenders Marine Terminal".

RFAI: Please clarify the term "10 ft. updraft at 0.0 tide". What tide range will be required to allow a vessel and barge to moor commensurate with the vessel and barge sizes referenced in the plan, and will the dock face area be dredged to allow vessels and barges to call under most tidal ranges? Please also clarify, where appropriate, the specific problems that ice flows may cause. If this is the case for the Rig Tenders location, it should be stated clearly. Finally, we recommend including the location of Hilcorp's Rig Tenders Marine Terminal on the Figure I-1 map. Section 1.5.2 mentions this location twice and indicates that it's located, "south of East Forelands". We also recommend editing the entire plan where appropriate to refer to this location with a consistent name.

1.6 RESPONSE SCENARIOS AND STRATEGIES

1.6.3 SCENARIOS

Scenario 1 Table 1-8 - Major Tank Failure and Onshore spill at TBPF in Summer - Response Strategy

(ii) Preventing or Controlling Fire Hazards indicates a courtesy notification is made to the Nikiski Fire Department and they are put on standby for response and scheduled overflights. Since this scenario centers on a catastrophic tank failure resulting in approximately 45,000 bbls of crude oil being discharged into the environment creating a threat of fire. It seems reasonable to contact the Nikiski fire department. However, referring to that contact as a courtesy seems to diminish its importance.

RFAI: Recommend rewording the statement to emphasize the importance of notifying the Nikiski fire department of a significant fire threat set to take place at the facility.

(x) Plans, Procedures, and Locations for Temporary Storage and Disposal indicates that depending on volume, oily soil and gravel is stockpiled within the northwest tank area or other area with secondary containment at TBPF prior to being shipped to an approved off-site treatment site or disposal facility. While using a secondary containment area to hold recovered oily soils until proper disposal can take place makes sense. The question of maximum volume before diminishing the secondary containment capacity is not identified. Based on the scenarios tank release, the process to determine the maximum amount of solid waste that could be stored on site should be noted; i.e., define the available cu. ft. of storage space for various secondary containment is available before diminishment of those containment areas.

RFAI: Please clarify how the amount of oily solid waste to be stored onsite will be considered to ensure secondary containment capacity will not be jeopardized.

Scenario 1 Table 1-8 - Major Tank Failure and Onshore spill at TBPF in Summer - Oil Recovery Capability

For TF-4, column C previously indicated that front-end loaders, skid steers, and dump trucks were all located on site but "all located on site" has been stricken.

RFAI: Please clarify where this equipment will now come from.

Scenario 2 Table 1-13 – Offshore Production Well Blowout at Granite Point Platform in Summer-Response Strategy

(ii) Preventing or Controlling Fire Hazards indicates contract vessels equipped with fire pumps can arrive within 3 hours to apply firewater in emergency situations. It would seem prudent that in a well blowout situation involving platform personnel evacuation, activating at least one vessel equipped with a fire pump to stand by the scene would provide immediate response should the well ignite as well as an additional on water safety asset to aid survival capsules.

RFAI: Recommend activating or placing vessels with fire pumps on standby to respond.

(vii) Spill Recovery Procedures indicates that in hours 4 and 6 different class response vessels are used to tow barges as part of the response tactics being deployed. However, no description of barge capacity is provided.

RFAI: Please clarify barge size to allow fair evaluation of response actions and capabilities.

Response Strategy 1 – Major Tank Rupture and Onshore Spill at GPTF in Summer

Figure 1-10 – Layout and Spill Direction -would be beneficial if the image was a satellite image and not a black and white topo/line drawing. Additionally, topo elevation change numbers/labels are unreadable in this image.

RFAI: Recommend updating this image to a satellite photo (like Figure 1-4) and including discernable topographic elevation line markers and numbers.

Scenario 3 Table 1-17 - Offshore Production Well Blowout at Granite point Platform in Winter-Scenario Conditions

Trajectory indicates the simulated discharged oil is ejected at 8312 bopd with a 400 gas to oil ratio (GOR). This seems to contradict the Quantity of Oil Spilled Parameter Conditions which indicate 813 bopd.

RFAI: Please clarify the barrels of oil per day amount.

Scenario 3 Table 1-18 - Offshore Production Well Blowout at Granite Point Platform in Winter-Response Strategy

(ii) Preventing or Controlling Fire Hazards indicates contract vessels equipped with fire pumps can arrive within 5 hours to apply firewater in emergency situations. Here again, it would seem prudent that in a well blowout situation involving platform personnel evacuation, activating at least one vessel equipped with a fire pump to stand by the scene would provide immediate response should the well ignite as well as an additional on water safety asset to aid survival capsules.

RFAI: Recommend immediate notification of vessels with fire pumps to mobilize at least one vessel to standby on-scene during and following platform evacuation.

(iv) Surveillance and Tracking of Oil; Forecasting Contact Points discusses surveillance of the spill site and tracking efforts to forecast the spill trajectory. However, there is no mention of ice conditions. While the scenario parameters indicate moderate ice conditions (3-5 tenths coverage), ice in Cook Inlet is very dynamic. It is important to closely monitor the ice accumulation and movement on tide and wind currents. These movements can drastically affect recovery operations as well as oil trajectories.

RFAI: Recommend taking into account the influence ice may have on the movement and concentrations of oil and include measures to address those influences regarding tracking oil and forecasting trajectories.

(v) Protection of Environmentally Sensitive Areas and Areas of Public Concern indicates spill trajectory based on Figure 1-7. While Figure 1-7 does show the trajectory of oil impacting the shore line, those trajectories are based on winds from the South at 10kts., while this is a winter scenario and the prevailing winds are from the N, NE at 10-20 kts., which would seem to move the oil in the opposite direction. Understandably, the plan holder wants to demonstrate oil impacting a sensitive area, however the response strategies should follow the parameters set out at the beginning of the table.

RFAI: Recommend demonstrating the identification and protection of sensitive areas appropriate for the winter scenario.

Response Strategy 2 Table 1-23 – On Shore Production Well Blowout at SRF in Summer

(ii) Preventing or Controlling Fire Hazards indicates courtesy notification is made to the Nikiski Fire Department. Since the SRF is accessible via the road system from Sterling, AK it seems prudent to notify the fire department closest to the facility. Furthermore, as pointed out earlier in these comments, it does seem reasonable to contact the fire department. However, referring to that contact as a courtesy seems to diminish its importance. Given the nature of this potential fire hazard combined with the possibility of an existing summer fire hazard, it seems prudent to not only notify the appropriate fire department but to request them to attend the facility until it is determined their assistance is not required.

RFAI: Recommend rewording the statement to emphasize the importance of notifying the closest most appropriate fire department of a significant fire threat set to take place at the facility and request them to attend until the threat is abated.

(v) **Protection of Environmentally Sensitive Areas and Areas of Public Concern** indicates the USFWS is notified immediately and that HAK personnel also make agency notifications to help identify priority locations and coordinate a protection strategy. In previous scenarios notifications were noted to have taken place in the Stopping Discharge at Source phase of the scenario. However, the issue here is not where in the ADEC requirements or Response strategies agency and stakeholder notification is noted, it is more important to identify when and to name the agencies and stakeholders to be notified and then why. Acknowledging the US Fish and Wildlife Service as a significant stakeholder agency for this area is important, but the State of Alaska also has a stake in the response command and control for this blowout scenario and should be noted as such.

RFAI: Recommend placing more emphasis on agency and stakeholder notification in this scenario.

PART 3: SUPPLEMENTAL INFORMATION

3.2 RECEIVING ENVIRONMENT

3.2.1 Potential Routes of Discharge

Table 3-2 Summary of Potential Impact Areas for HAK Onshore Facilities, the "Likely Impact Area" column indicates that, "it is possible for a spill to drain downhill, but would likely remain in vegetation surrounding pad." First, there's no supporting information to substantiate why it would be unlikely that a spill would remain in vegetation surrounding the pad. It's also difficult to ascertain what portions of the surrounding terrain actually goes downhill as the drainage map in Figure 3-2 does not provide the necessary level of detail in the area immediately around Pad 4. Based on the general flow shown in Fig 3-2, and based on a catastrophic release of 5,000 bbl of oil from tank 005, it appears possible that oil may migrate into the woodland and wetland area to the east of Pad 4, across the Pad 3 access road, and potentially into the unnamed lake mentioned on page 3-9 under the "Beaver Creek Oil and Gas Production Facility" paragraph immediately after Table 3-2. Additionally, and also as described on page 3-9, there are ESA's within 250 ft of Pad 4.

RFAI: Additional detail should be included in Table 3-2 and Figure 3-2 to show, "gradients and potential containment sites and features..." to better describe the potential routes of discharge as per 18 AAC 75.425(e)(3)(B).

3.10 PROTECTION OF ENVIRONMENTALLY SENSITIVE AREAS AND AREAS OF PUBLIC CONCERN

This section identifies Trading Bay State Game Refuge (TBSGR) and Redoubt Bay State Critical Habitat Area as two areas of major concern, both of which are west-southwest of most of HAK's production facilities. However, the scenario-based trajectories provided in Section 1 indicate primary shoreline

impacts will occur to the northwest of most production platforms (which in turn contradict predominant wind data as outlined above under our Scenario 3 Table 1-18 (v) comments). Based on the new trajectory in Figure 1-7, Scenario 2 Table 1-13(v) changes potentially impacted sensitive areas from TBSGR to Susitna Flats Game Refuge and Beluga Whale Critical Habitat.

RFAI: In order to meet the spirit of 18 AAC 75.425(e)(3)(J) "identification of and planned protection measures of those areas must be based on mapped predications of discharge movement, spreading, and possible points of contact.", we recommend taking a closer look at plan content in Sections 1 and 3 as it relates to identification of those ESA's and AOPCs that are of the most concern based on the current trajectory data. At the same time, wind data and trajectory information provided in Section 1 should also be reviewed as there appears to be a disparity between which areas are of primary concern and which areas are most susceptible to oil spill impacts based on wind/trajectory data.