



"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."

November 14, 2022

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

SUBJECT: Comments on Hilcorp Alaska, LLC Oil Discharge Prevention and Contingency Plan for Cook Inlet Exploration Facilities (#22-CP-5216)

Dear Mr. Evans:

Cook Inlet Regional Citizens Advisory Council (CIRCAC) submits these comments on the Hilcorp Alaska, LLC (HAK) Oil Discharge Prevention and Contingency Plan (ODPCP) for Cook Inlet Exploration Program. 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.

We have conducted a thorough review of the plan as submitted. While the overall content of this plan is in large part satisfactory, there are several areas that require further detail and clarification. Some examples of areas in need of clarification through improved detail include additional Emergency Action Checklist and Internal Notification information, additional Response Scenario information, and additional information related to HAK's response training. Our enclosed comments identify these and other areas for improvement, and additional recommendations for clarification throughout the plan sections.

If you have any questions or wish to discuss this further, our Director of Operations may be contacted at (907) 776-5223 or via email at SteveCatalano@circac.org. I may be reached at (907) 283-7222 or via email at MikeMunger@circac.org. CIRCAC requests a findings document to be supplied at the end of this plan review.

Sincerely,

Michael Munger
Executive Director

Cc: Graham Wood

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*Kenai Peninsula
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*Municipality
of Anchorage*

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Comments and Requests for Additional Information

Regarding

Hilcorp Alaska, LLC

Cook Inlet Exploration Program

Oil Discharge Prevention and Contingency Plan

Submitted

By

COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL

NOVEMBER 14, 2022

General and Front Matter Comments

A new Statement of Contractual Terms between Hilcorp and CISPRI appears to be included in the plan on pages xiv-xv but execution date and signatures are missing.

RFAI: Please provide an executed statement and update the plan accordingly.

PART 1: RESPONSE ACTION PLAN

1.1 EMERGENCY ACTION CHECKLIST

Table 1-1 Emergency Action Checklist Table 1-1 indicates that the Environmental, Health and Safety (EHS) Representative should be immediately notified by the first person detecting a spill and further indicates that the EHS Representative is primarily responsible for making several further notifications. Section 1.2.1 Internal Notification Procedures states that it is HAK's policy for employees and contractors to report spills of oil or hazardous substances regardless of size, on HAK leases to the EHS representative, or 24-hour spill phone.

While the previous version of the plan included the name and phone number of the EHS Representative in Figure 1-1, both the title and the name of the EHS representative have been removed; instead listing only a 24-hour spill phone number. 18 AAC 75.425(e)(1)(B)(i) requires that the Emergency Action Checklist includes the "Title & phone of facility personnel making the notification."

Figure 1.1 indicates the first person to detect a spill notifies the 24-hr. Spill Phone. Then someone notifies the Hilcorp Emergency Response Program Manager at the phone number listed. There is a disconnect between the 24 hr. Spill Phone and the Hilcorp Emergency Response Program Manager. Figure 1.1 implies/assumes that whoever answers the 24-hr. spill phone will notify the Emergency Response Program Manager. While we recognize the logic behind calling a 24-hr. Spill Phone, it does not meet the requirements of 18 AAC 75.425 (e)(1)(B)(i) by identifying the title of the individual charged with answering the 24-hr. Spill Phone and, in turn, is assumed/implied to then notify the Emergency Response Program Manager.

RFAI: Please revise Figure 1-1 to include the title and phone number of the individual answering the 24-hr Spill phone as required by 18 AAC 75.425(e)(1)(B)(i). Recommend revising section 1.2.1 Internal Notification Procedures, to reflect consistency within the internal notification process.

1.2 REPORTING AND NOTIFICATION

1.2.1 INTERNAL NOTIFICATION PROCEDURES

Table 1-1 Emergency Action Checklist

Figure 1-3 HAK Spill Report Form This Spill or Release form should contain better instruction.

RFAI: Please consider updating this form with the following:

- *Include some examples for spill/release type (e.g., To ground, secondary containment, to water, etc.)*

- Specify if spill results in volume > 1bbl, or did material cause sheen on water? (Specify Yes >1bbl or, Yes caused sheen or, Yes >1 bbl that caused a sheen)
- Include examples for Company (e.g., Contractor name or description)
- Detailed description of incident should indicate “Attach separate page(s) as needed.”
- Remediation action / Steps taken to prevent recurrence should indicate “Attach separate page(s) as needed.”

Table 1-2 Agency Contacts This table lists ADF&G and USFWS but does not indicate whether or not a written report is required. Previous versions of this table indicate “None” or provide some other instruction.

RFAI: Please update this table to clarify written reporting requirements for ADF&G and USFWS.

1.5 DEPLOYMENT STRATEGIES

1.5.2 TRANSPORT OF RESOURCES

This section discusses operations at the OSK dock in Nikiski. However, the discussion does not fully identify the limitations to those operations since part of the dock face had been lost to winter storm impact.

RFAI: Based on recent winter storm damage, we recommend expanding the discussion of operation, capabilities, and limitations at the OSK dock.

1.5.3 TRANSPORTING EQUIPMENT AND PERSONNEL IN ADVERSE WEATHER

Table 1-4 Summary of Staging Capabilities in the Cook Inlet Region This table indicates that the Rig Tenders Dock experiences a tidal Range of 20.7 ft and tidal currents run from 3 to 4 knots.

RFAI: Please confirm tidal current velocity, as current velocities exceed 4 knots at the Marathon dock immediately to the south of the Rig Tenders dock. It is important to note this detail as it is a component of the Cook Inlet Ice Guidelines which include Offshore Supply vessels and tug and barge operations.

1.6 RESPONSE SCENARIOS AND STRATEGIES

1.6.2 RESPONSE SCENARIOS

In all “Scenario Condition” tables in this section, only the specific site name is provided in the “Spill Location” block while a more detailed description of the location is contained in the “Surface” block of each table.

RFAI: Recommend including a brief location description with the site name (e.g., Seaview Pad, located 1.25 miles east of Cook Inlet approximately ½ mile from the old Sterling Highway) or note that a more detailed site location description maybe found in Appendix A.

This section only includes a summer oil storage tank rupture scenario (*Scenario 1 – Oil Storage Tank Rupture in Summer*). Other scenarios contained in this section include onshore winter recovery operations, albeit for oil deposition by blowout over a larger area. While response actions for an oil storage tank ruptured in a different season would generally be the same, oil within and/or escaped from containment in winter would require much the same recovery tactics and techniques as oil deposited resulting from a blowout and should be specified here.

RFAI: Please clarify this rationale or consider noting the seasonal tactics in the appropriate places within the scenario table. Including this information is in keeping with 18 AAC 75.425(e)(1)(F) which indicates that response strategies should account for variations in receiving environments and seasonal conditions.

Scenario 1: Table 1-6 Response Actions – Oil Storage Tank Rupture in Summer Section (ix) *Transfer and Storage of Recovered Oil/Water; Volume Estimating Procedure* states that, “Additional vacuum trucks transport the recovered oil stored at the Hilcorp pads to Middle Ground Shoal (MGS) Onshore facility until introduced back into the production process.”

Additionally, Section (ix) also indicates that free product will be transported to and stored within rental tanks setup and located at Hilcorp pads. While section (vii) indicates that, *By hour 3...recovered free liquid is transported directly to an approved facility...*, there is no indication of how long it will take to acquire the requisite number of rental tanks, transport them to a Hilcorp pad, and set them up to receive recovered liquids.

RFAI: Please clarify if the transported oil will remain in and be stored in these vacuum trucks at the MGS facility until it is eventually reintroduced into the production process and how long it will take to acquire, transport, and set-up rental tanks and have them ready to meet the 3-hour window indicated in section (vii).

Scenario 2: Table 1-11: Response Actions – Susan Dionne Exploration Well Blowout in Winter Section (ii) *Preventing or Controlling Fire Hazards* states that a Fire watch is maintained by onsite HAK and CISPRI staff until the fire department arrives. Section (i) states that Wild Well Control Inc. (WWCI) is notified along with CISPRI, the IMT, and proper personnel and agencies. However, no distinct notification is referenced for the Fire Department to provide firefighting capabilities until WWCI arrives

RFAI: Recommend including specific notification of the Kenai Peninsula Central Emergency Services in order to alert the nearest Fire Department appropriate to the spill location.

Scenario 3: Table 1-17 The format used in Table 1-17 is slightly different from other scenario tables in that columns H and I are titled differently than other similar tables in this section.

RFAI: Please update this and other similar tables format to avoid confusion in the information and/or the tables themselves.

1.7 NON-MECHANICAL RESPONSE OPTIONS

1.7.1 IN SITU BURNING

The link to the In Situ Burning Application and Checklist at the end of the second paragraph does not appear to be correct.

RFAI: Please update the link as appropriate.

1.9 RESPONSE SCENARIO FOR AN EXPLORATION OR PRODUCTION FACILITY

1.9.3 Techniques and Equipment for an Onshore Response

1.9.3.1 Firewater Application This section indicates that, “initially, the firewater application should be instituted as quickly as possible (via fire trucks) to prevent ignition or collateral damage from a fire.” However, while it is implied that a notification would have been made, no specific instruction to do so or

notification contact information for the Kenai Peninsula Central Emergency Services could be found to facilitate notification to get “fire trucks” to the scene. Only one reference to the 911 number can be found in the plan.

RFAI: Recommend including “911” phone number and specific language instruction in this section, to ensure facility personnel know exactly what to convey to the 911 operator in order to have pumper and tank trucks arrive ready to respond to this type of emergency, e.g., “Dial 911 to contact Kenai Peninsula Central Emergency Services. Provide facility name and location. State type of emergency and required firefighting and safety assets needed.” Additionally, recommend that Hilcorp meet with local firefighting companies (most likely to respond) to begin a dialogue and familiarization with the facilities contained in this plan.

PART 2: PREVENTION PLAN

2.1 DISCHARGE PREVENTION PROGRAMS

2.1.1 Oil Discharge Prevention Training Programs

In the Prevention Training Table, it is unclear why Spill Reporting training was removed.

RFAI: Please clarify why this particular training was discontinued/removed.

2.2 DISCHARGE HISTORY

A contributing factor in the spill that occurred on May 8, 2018, at Pad 33-30 inside the 428 drilling rig was the accumulation of snow and ice at and around the rig and associated equipment.

RFAI: Based on this scenario, and as an additional preventative measure, recommend including periodic snow and ice removal at and around pads and drilling rigs and other areas where machinery is located and where leaks like the one described may occur to avoid long periods when leaks may go undetected.

PART 3: SUPPLEMENTAL INFORMATION

3.6 RESPONSE EQUIPMENT

3.6.1 Equipment Lists The first paragraph in this section indicates that, “A spill response equipment connex will be located at each exploration site.” Based on the use of the phrase “will be”, it is unclear as to whether a spill response CONEX is already located/pre-positioned at each site. From its title, Table 3-1 indicates that these CISPRI-owned CONEX are already staged at each HAK exploration site.

RFAI: Please update this section to indicate if a spill response CONEX is already located/pre-positioned at each HAK site. Also consider correcting the spelling of the word “conex.”

3.9 RESPONSE TRAINING AND DRILLS

This section does not provide a “*detailed description of the training programs for discharge response personnel*” as required by 18 AAC 18.425 (e)(3)(I) instead providing a bulletized list of standardized NPREP training for employees participating on the Incident Management Team.

RFAI: Please provide more details or references to other documents on the training programs in place for all discharge response personnel.

APPENDIX A

Site specific information is not consistent in format; especially travel time from CISPRI. Some site information sheets use a table while others include travel time in text.

RFAI: Please review and update all site-specific information and associated tables using consistent formatting.