

Cook Inlet Regional Citizens Advisory Council

Please find attached our Comments and request for additional information regarding BlueCrest Alaska Operating LLC Hansen Production Facility Oil Discharge Prevention and Contingency Plan, ADEC Plan #:15-CP-5245



"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."

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of Anchorage*

January 25, 2023

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

SUBJECT: Comments and request for additional information regarding BlueCrest Alaska Operating LLC Hansen Production Facility Oil Discharge Prevention and Contingency Plan, ADEC Plan #:15-CP-5245

Dear Mr. Evans:

Cook Inlet Regional Citizens Advisory Council (CIRCAC) submits these comments on the BlueCrest Alaska Operating LLC Hansen Production Facility Oil Discharge Prevention and Contingency Plan (ODPCP) major amendment which was submitted for review on December 13, 2022. 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.

Our review revealed several areas within Section 1.6 that warrant attention and clarification including the Blowout Control and Well Capping sections. Additionally, there are several other areas within the scenarios that require attention including some calculations, terminology, and additional required information. Several sections within Parts 2 and 3, specifically well blowout miscalculations under Section 2.3.4. Finally, changes made to the plan as part of this amendment (in sections 1.6 and 4.2) appear to delete information relative to contracted well control expertise.

Our enclosed comments identify areas for improvement and recommendations for clarification based on our review of the submitted amendments. 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



Comments and Requests for Additional Information

Regarding

BlueCrest Alaska Operating, LLC

Hansen Production Facility

Oil Discharge Prevention and Contingency Plan

Submitted

By

COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL

JANUARY 25, 2023

PART 1 - RESPONSE ACTION PLAN

1.5 DEPLOYMENT STRATEGIES

1.5.4 Response Contractor Mobilization

This section discusses contractor mobilization and indicates that, "Primary response to a large oil spill will require the mobilization of a number of contractors including CISPRI." However, throughout section 1.5 only CISPRI is mentioned. No other contractors that will or may be mobilized are identified.

RFAI: Request identification of other contractors that will or may be activated for response action.

1.6 RESPONSE SCENARIOS

1.6.1 Procedures to Stop Discharge

Blowout Control

This section discusses options to regain control of a well blowout, indicating BlueCrest Operating Alaska (BCOA) has several surface options available that would be attempted prior to initiating a relief well. The section further indicates that, "Well control may be regained by removal of some of the blowout preventer (BOP) stack and installation of a master valve" and, "Another method for regaining control is diversion of the flow to allow installation of additional remotely operated well control equipment to the existing stack or on the wellhead." Use of the diverter seems logical, however, removing some of the BOP stack seems counterintuitive.

RFAI: Please explain the reasoning for removing part of what seems to be the exact device needed to regain control of the well.

Well Capping

This section discusses well capping and the well control contractors that may be used. The plan previously named a well control expert, but this specific information has been removed and replaced with the phrases, "or equivalent contractor", and "well control contractor." 18 AAC 75.990 -Definitions states, "blowout contingency plan" means a written, site-specific description of the procedures, methods, equipment, personnel, logistics, and activities that will be employed to regain control of an uncontrolled flow of oil, gas, drilling mud, and other substances from an exploration or production well." While the blowout contingency plan is not part of the ODPCP, a blowout contingency plan that meets the above requirements must include specific information regarding well control services and this should be included in the ODPCP. Regulations at 18 AAC 75.425(e)1(E)(ii) further support this practical need, stating, "if the operator is not the primary spill responder, procedures to notify and mobilize the response action contractor or other responder identified in the plan, including a description of the interim actions that the operator will perform until the responder identified in the plan initiates a full response to the discharge;"

RFAI: Please identify the well control contractor on contract with BCOA.

1.6.12 Spill Response Scenarios

The term “in-land” is used throughout the scenario tables. This term is confusing because the Alaska Inland (planning) Area as determined by the current USCG-EPA FOOSC Boundary MOU, defines the inland zone as, “the environment inland of the coastal zone” which essentially means all parts of Alaska inland of 1,000 yards from the extent of tide, including all non-tidally influenced navigable waters and wetlands.

RFAI: Please clarify where the Inland and Coastal zones begin in relation to this plan. Consider substituting the term “onshore” for “in-land”.

1.6.12.1 SCENARIO 1 HPF WELL BLOWOUT DURING SUMMER

Table 1.6.12.1-1 Scenario 1 Response Strategy – HPF Well Blowout During Summer

Trajectories – The Day 1 calculation for oil deposited within the pad (70% of 1,700 barrels) is incorrect by 20 barrels. The correct amount is 1,190 barrels instead of 1,170 barrels. Scenario 2 contains the correct calculation.

RFAI: Please correct this calculation to accurately reflect the amount deposited within the pad on Day 1.

Table 1.6.12.1-2 Scenario 1 Response Strategy – HPF Well Blowout During Summer

(iii) Surveillance and Tracking of Oil: Forecasting Shoreline Contact Points

The “Response Strategy” of this table (and in the same section under Table 1.6.12.2-2) indicates that, “TF OW-1 is equipped with an infrared (IR) camera that supplements direct visual evaluation and during times of darkness or reduced visibility.” This appears to be a reference to use of the CI-OW-1 tactic (Primary Response Vessel Strike Force) identified in the CISPRI Technical Manual. However, in Tables 1.6.12.1-5 and 1.6.12.2-5, the listed task force ID is TF-1S which references use of the CI-OW-1 tactic.

RFAI: For clarity’s sake, we recommend updating the “Response Strategy” section of Tables 1.6.12.1-2 and 1.6.12.2-2 with the correct task force identifier as listed in Tables 1.6.12.1-5 and 1.6.12.2-5.

Table 1.6.12.3-2 Scenario 3 Response Strategy – Tank Rupture

Although elements of a site-specific safety plan are mentioned within this table (i.e., PPE requirements, site characterization, safety concerns over threat of fire, establishment of control zones, wind and air monitoring), there is no indication that a site-specific safety plan will be developed or submitted. Conversely, a site-specific safety plan is mentioned in Table 1.6.12.3-3 Scenario 3 Response Timeline at hour +3.

RFAI: Please clarify why no site-specific safety plan is included in Table 1.6.12.3-2.

PART 2 - PREVENTION PLAN

2.1 PREVENTION, INSPECTION AND MAINTENANCE PROGRAMS IN PLACE

2.1.1 Prevention Training Programs

Prevention and Drilling-related Training

This section discusses training to be provided to personnel involved in drilling activities and contains a bullet list of prevention-training programs personnel will be required to attend. However, while the list indicates most training programs will be refreshed each drilling season or other incremental periods, there are three that do not seem to indicate a refresher period:

- Confined Space Entry (Refresher – None)
- Lockout/Tagout of Hazardous Energy Sources (Refresher – None)
- Hydrogen Sulfide Gas (Refresher – None)

Understandably, these training programs are not spill prevention programs, but they are programs related to personnel safety and the prevention of injury and/or death. Therefore, these programs should be acknowledged and listed.

RFAI: Please consider including refresher training for the items listed above.

2.1.7 Well Control and Emergency Shutdown

Well Control During Drilling Below the Surface Hole

This section outlines preventative and recovery measures to minimize hydrocarbon spill potentials during drilling operations. The section indicates that Blowout Out Preventer (BOP) drills are performed and timed on the rig several times during drilling to verify that the well can be shut-in quickly and properly.

RFAI: Please specify how often BOP drills are conducted during drilling operations.

2.3 POTENTIAL DISCHARGE ANALYSIS

2.3.4 Well Blowouts

This section indicates that, “the appropriate RPS is 300 bopd with a gas to oil ratio (GOR) of 5,270.” Based on the new Response Planning Standard of 5,100 barrels (1,700 bopd), it appears that this section was not updated as part of this amendment.

RFAI: Recommend updating this section with the appropriate bopd and GOR calculations.

PART 3 – SUPPLEMENTAL INFORMATION

3.8 RESPONSE CONTRACTOR INFORMATION

Figure 3.8-1 Statement of Contractual Terms – CISPRI

This figure displays a Statement of Contractual Terms signed by BCOA Vice President- Alaska and CISPRI General Manager dated 7-18-14. However, the

documents do not display the printed name of each signer. Because of this there is no way to determine if the Vice President-Alaska is still with BlueCrest Operating Alaska or if this is the most current version.

RFAI: Please verify the most recent and up-to-date version of the response contractor contractual terms.

Table 3.10-1 External Notification List - Local and Tribal Contacts

This table lists numerous notification contacts and phone numbers. However, the list appears to be somewhat outdated, failing to list Marathon Petroleum refinery in Nikiski and as the owner of the LNG facility. Likewise, the Tyonek platform's listed owner appears incorrect. Additionally, the Elmendorf (Joint Base Elmendorf-Richardson –JBER) phone number has experienced a recent change to 907-552-2802. Likewise, there is no Alaska State Trooper (AST) unit in Anchorage other than AST Headquarters at 907-269-5641; to reach Anchor Point AST- call Soldotna AST number for dispatch; No Homer AST unit- Homer PD responds. The Anchor Point and Ninilchik Fire Departments' contact number is now incorporated under Western Emergency Services at 907-235-6700.

RFAI: Recommend verification and correction of External Notification List and corresponding contact numbers.

PART 4 – BEST AVAILABLE TECHNOLOGY REVIEW

4.2 SOURCE CONTROL

This section discusses well source control and well capping and identifies Boots and Coots and Wild Well Control as a well control service providers. Earlier in the plan (Part 1.6 Well Capping) the well control expert name (Wild Well Control) was removed from the plan and replaced with the phrases, "or equivalent contractor" and "well control contractor". BCOA's relationship with either well control expert, or if there is any contractual relationship(s), is unclear.

RFAI: Please clarify BCOA's relationship with the well control experts mentioned in this plan.