

Alaska Oil and Gas Association

Comment(s) of the Alaska Oil and Gas Association are attached.

Alaska Oil and Gas Association



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Patrick Bergt, Regulatory & Legal Affairs Manger

January 19, 2021

Via Email: anita.erickson@alaska.gov

Ms. Anita Erickson, PE
Alaska Department of Environmental Conservation
Division of Water - Wastewater Discharge Authorization Program
555 Cordova Street, 3rd Floor
Anchorage, Alaska 99501-2617

Re: Furie Operating Alaska LLC, KLU Julius R. Platform (Individual Permit AK005368)

Ms. Erickson:

This letter provides the support of the Alaska Oil and Gas Association (“AOGA”) of the above-referenced wastewater discharge permit application (“Permit”), submitted by Furie Operating Alaska LLC (“Furie”).

As noted in the application, the addition of a system to treat produced water prior to its discharge to Cook Inlet from the platform represents a unique treatment system that is demonstrably efficient and produces exceptional-quality effluent. Furie has tested the system and the results show effective removal of hydrocarbons as well as a range of other metals resulting in the need for relatively small mixing zones. This addition will allow the facility to maintain economically viable production while providing for adequate protection of the receiving water.

Water in the Furie pipeline has a history of causing hydrates. Eliminating water from the pipeline minimizes this risk to Alaska’s heating supply. As recently as January 10, 2021, Furie had a hydrate plug form in the pipeline and had a pipeline shutdown for almost 24 hours.

Furie is committed to Alaska and to providing Alaskans with affordable, sustainable energy. If you have any questions or concerns, or if you would like to discuss this further, please let me know.

Sincerely,

A handwritten signature in blue ink, appearing to read 'P. Bergt', is written over a light blue horizontal line.

Patrick Bergt
Regulatory & Legal Affairs Manager