

Endicott Development Project

Public Scoping Meeting

Anchorage

1983

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PUBLIC SCOPING MEETING
ENDICOTT DEVELOPMENT PROJECT

ANCHORAGE, ALASKA

JANUARY 18, 1983

H & M COURT REPORTING
1031 WEST 4TH AVENUE, SUITE 220
ANCHORAGE, ALASKA 99501
(907) 274-5661

1 P R O C E E D I N G S

2 January 18, 1983

3 (Whereupon the hearing convened at 9:00 a.m.)

4 COLONEL SALING:

5 Good morning, ladies and gentlemen. I appre-
6 ciate your all coming out this morning. And for
7 those of you who have not met me, I'm Colonel Neil
8 Saling. I'm District Engineer for the Alaska
9 District for the Corps of Engineers. I've met
10 quite a few of you that I see in the audience, but
11 I haven't met all of you. I hope that -- I hope
12 doesn't cause you to hesitate to speak up today,
13 because that's what this meeting is all about.

14 We received an application for a permit for
15 Section 10 and 404 -- Section 404 permits from
16 the Exxon and Sohio Petroleum Companies for a
17 project which is now known as the Endicott
18 Development. For th -- I -- I suggested to somebody
19 that as a password to get in, that everybody would
20 have to pronounce Sagavanirktok as the delta. I've
21 been told I have to know that name when I go up on
22 the North Slope, instead of just saying Sag Delta.
23 But -- it was the Sag Delta to some people, other
24 people it's the Duck Island, to us here today, it's
25 the Endicott Development.

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1 You're going to be briefed on what that is all—
2 about, regardless of what you call it, a little bit
3 later by representatives of the -- of the two oil
4 companies. The reason that we're here today is
5 because as a basis for my reaching a decision on
6 those permits that have been requested, we are going
7 to prepare an Environmental Impact Statement.
8 This meeting, plus four others -- one in Barrow, one
9 in Nuiqsut, one in Kaktovik, and one in Fairbanks
10 will allow us to begin to get a feel for those
11 things that must be addressed in that environmental
12 impact statement.

13 When we say a scoping meeting, that's precisely
14 what we mean. We're trying to get a feel for what
15 the scope of that Environmental Impact Statement
16 should cover. And we hope to get from you today
17 some comments as to what you think ought to be in-
18 cluded in that en -- en-- environmental impact
19 statement.

20 These -- these scoping meetings are designed
21 to begin at the beginning of the environmental impact
22 process. And I think the approach has some real
23 merit. We have had virtually no comment -- formal
24 comment from any of the -- duly constituted
25 resource agencies and so those of you who are

1 private citizens today, really are getting your word
2 in first, before we've had any -- any formal input
3 from any of these agencies.

4 You have with you an outline as prepared by our
5 contractor with some of the bare bones of what he
6 thinks ought to -- we ought to start out with in
7 that Environmental Impact Statement. What we need
8 from you is to begin to fill in some of the blanks
9 that's been left.

10 Our schedule for preparing the Environmental
11 Impact Statement is shown in the scoping document
12 which you have for reference. The draft is
13 planned to be out in October of this year, and the
14 final EIS completed in March of 1984.

15 One of our preliminary assumptions is -- is that
16 there is a body of knowledge available to us, such
17 that this Environmental Impact Statement will not
18 require extensive additional field work beyond that
19 which has been done to date. And the schedule that you
20 see is based upon that assumption. Once the impact
21 statement is completed, then I will make a decision
22 on the permits some time in the May or June time
23 frame of next year.

24 So that you know who's -- who the players are in
25 this, let me introduce some of my people. My staff

1 that's going to be responsible for preparing the
2 Environmental Impact Statement is Bill Lloyd, and
3 sitting here in front and with him, Rich Gutleber
4 and here, Dave Barrows. Right here in front is the
5 head of my regulatory functions branch and those
6 people will be the key movers.

7 To help these people and my shop prepare the
8 Environmental Impact Statement, we have a third
9 party agreement with a consulting firm of Environ-
10 mental Research and Technology, or E-R-T, or ERT.
11 They are the -- they're the people who'll be doing
12 much of the environmental analysis. And sitting
13 right here is Bob McDonald, who is our representa-
14 tive, and he's going to help me chair the meeting
15 today.

16 I've asked the -- as I indicated, I've asked the
17 oil companies to make a presentation on their pro-
18 posed Endicott Project. And they're going to cover
19 several of the alternatives that they've already con-
20 sidered as far as this project is concerned. Then
21 Mr. McDonald of ERT will discuss the environmental
22 affects, a little bit more about the Environmental
23 Impact Statement, and then we'll take about a --
24 we'll have a question period after that. So that you
25 get a chance to ask these people, both the oil

1 companies and our environmental consultant, questions
2 on their presentations. Then following that we'll
3 take a fifteen minute break, have a cup of coffee,
4 and then come back and we will go through your com-
5 ments and any formal presentations that you have.

6 I want to make sure that you understand the
7 alternatives that I have, and this may affect the
8 comments that you give me of what should be con-
9 sidered. I have three alternatives as far as the
10 permit is concerned. I can deny the permit in its
11 totality for one reason or another. I could issue
12 the permit precisely as it's requested. Or the
13 third, and probably the alternative that is most
14 probable is that there will be major changes to the
15 permit stipulations and then the permit will be --
16 would be issued. Which one of those three alterna-
17 tives is chosen, is dependent upon the outcome of
18 the Environmental Impact Statement. And so your
19 comments now that we will get from you, both now and
20 after the draft of the nvironmental Impact State-
21 ment is published, will allow me to make one of
22 those three decisions.

23 So, I think that's enough for introductions, Bob
24 I'm going to ask you to take over now. Bob will
25 introduce the people from Sohio and Exxon, and then

1 he will proceed on with his part of the presentation.

2 MR. MC DONALD:

3 Thank you, Colonel. Before I proceed with my
4 presentation, just a little -- a couple of items I
5 want to take care of.

6 For all those who came in early, please make
7 sure that you fill out the sign up cards if you want
8 to give a presentation and return those to the lady
9 in the back. We want to make sure that you all are
10 given an opportunity to give a presentation later on.

11 In addition, we do have a copy of the scoping
12 document back on the back table. Make sure that you
13 do get a copy of that.

14 As the Colonel indicated, I am the overall
15 Project Manager for ERT on this project. And ERT has
16 been retained as the third party in the EIS contract
17 to conduct the environmental analysis for this pro-
18 ject. Therefore, we're going to work -- we will be
19 working quite closely with the Corps of Engineers
20 throughout this entire process. We've been working
21 with them over the last month in preparation of the
22 scoping process, in order to make all the arrange-
23 ments for that. And we will continue to work
24 closely with them throughout the remainder of the
25 project.

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As the Colonel indicated, the session that I'm chairing now will consist mainly of three different parts. The first topic will be a presentation by Sohio of the project's description and alternatives. Following that, I will give a brief description of the EIS scoping process and what we are going to accomplish by going through the scoping process. And then, finally, I will give an overall description of just the EIS process for those who may not be familiar with the EIS process.

At this time, I think it would be very appropriate for me to introduce to you some of the people who will be participating in the rest of the presentations this morning. And we have two gentlemen on my right from Sohio. We have Dan Huxley, who is the Development Planning Supervisor for Sag Delta Project, Dan. And then we have ^{Del}~~Bill~~ Dias, who is the Senior Environmental Engineer. And both those individuals will be involved either in a formal presentation or helping to answer some of the questions that you have on the project later on.

With that as a brief overview, it's appropriate now for me to turn the podium over to Dan, so that he can give us a briefing of the project description and the environmental--or the engineering summary,

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along with the alternatives. It's very clear for all of you that have a good understanding of the project description so that you can bring forward your issues and concerns that we're trying to identify for today. So, with that as a general introduction, Dan, I'll turn over to you.

MR. HUXLEY:

I'd like to begin this morning by just briefly reviewing the progress that we've made in the project since the developmental review meeting that we had back in May of last year with many of the permitting agencies. And I know many of you here today were present at that meeting. As Colonel Saling mentioned, the project is now referred to officially as the Endicott Development Project. At the time that we met last, it was at that time called the Duck Island Sag Delta Project.

One of the most important things that has happened, is the major conceptual engineering studies of the project that we've been conducting, have now been completed. These studies had been conducted for the purpose of determining the technical feasibility of developing the field, and the estimated cost of such development.

This work was being conducted in the broadest

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scale contemplable in terms of overall development size, realizing that certainly, the scope would be changing and subject to change through optimization work to be done in later phases of design.

Another item that the Colonel mentioned was we have now filed the initial project permit application, that being a gravel permit application with the Corps of Engineers. And that filing has kicked off the EIS process for which we're all here this morning.

The purpose of filing early, first off, is realizing that the EIS process is a lengthy one, and that the receipt of project permits is critical to our overall project development schedule. Secondly, it's been our intent -- continues to be our intent to resolve issues of both agency and public concern at as early a time in the project life as possible.

Another thing that we have done, we have prepared and submitted to the Corps and to the other agencies, an engineering overview and a companion environmental overview. The engineering overview describes the base case development that we have carried through conceptual design. And the environmental overview describes both the environmental

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setting and the changes that we feel might occur as a result of the development.

In terms of the current work that's ongoing right now, we are presently -- the companies are evaluating the major development concept alternatives, for the purpose of arriving at a preferred development scheme. The major issue that we're looking at right now, and what our efforts are focused on is on the optimum number and location of gravel islands. This determination is going to be dependent on the results of study work that's ongoing right now, both of a reservoir nature and an engineering nature.

We have also at the present time getting prepared to start our preliminary and detailed design effort. That's scheduled to get underway in the second quarter of 1983. At this present time, we have commenced already a very extensive 3-D seismic program, which has been conducted this winter in the project area. That survey is very necessary to the project in gaining a better understanding of this reservoir that we're trying to develop.

In terms of general comments, back in May we noted and feel it proper to note again, this project is of a marginal nature and at this time, a final commitment has not yet been made to develop. Such

1 a commitment cannot be made, in our feeling, until
2 additional reservoir information, engineering in-
3 formation and cost data is collected on the project.
4 However, we feel that we have made a significant
5 financial commitment to the project. To date, we
6 have expended as a group, in the order of
7 \$100 million, in terms of exploration, pre-
8 development, engineering and environmental study
9 work. And during the next eighteen months through
10 the preliminary detail design phases, and as a result
11 of the 3-D seismic work, we expect to expend in the
12 order of an additional fifty to sixty million
13 dollars. We feel this is indicative of our serious
14 intent to proceed as far forward in the project as
15 we feel it's financially and economically feasible
16 at this time. And we'll continue in that direction.

17 What I'd like to read off to you now is a
18 description of the project. The description I'll be
19 making, will, as I mentioned, represent the base case
20 project design that we carried through our conceptual
21 design work. And this is consistent with the pro-
22 ject description included in the engineering over-
23 view, as I noted has been filed with the Corps of
24 Engineers, and is available for public review.
25 It is also consistent with the meeting handout that

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you all have in front of you this morning.

In a very, sort of general nature, I'd like to just briefly describe the project overview and then get into more details on the specific project components. The project area is located approximately 15 miles east of Prudhoe Bay and two to four miles offshore from the Sag River Delta. We are generally looking in our base case, we're showing here four gravel islands. This includes a central drilling production island, two satellite drilling islands, and a waterflood gravel island. Next to that we'll have gravel causeway (indiscernible--coughing) main island shore, we will have pipelines, both inter island pipelines connecting the islands as well as sales pipelines transporting the oil and gas products from the main island to sales points at Prudhoe Bay area.

We'll have a total of up to 240 wells, 80 of those on each of three drilling and production islands. In addition to that, we will have a base operations camp, a permanent facility and a main construction camp, which will be on location for duration of the construction period. Both of those and base case are shown approximately six miles from the main production island in the Delta Uplands.

1 The project is expected to commence production
2 start up in mid-1988. Production, at that time, is
3 expected to amount to somewhere between 75 and
4 150,000 barrels of oil per day. That rate would ex-
5 pect to hold for several years and then begin
6 to decline. The gas produced and sold from field is
7 expected to peak at approximately 250 million cubic
8 feet of gas per day. The actual timing of that
9 sales peak and start of gas sales, at this point,
10 has not been determined and will depend, both on
11 the timing of the installation of the proposed
12 Alaska Natural Gas transportation system, as well as
13 a possible reservoir management needs for re-
14 injection of the gas.

15 What I'd like to do now is move into a little
16 more detailed description of the individual islands
17 and project facilities. The two satellite drilling
18 islands, each of those is located about 2½ miles
19 from the main island and approximately two miles
20 from shore. They will contain drilling and well
21 operations facilities for a maximum of 80 wells
22 each. The actual size of those islands in the base
23 case is noted to be approximately 750 feet by 1000
24 ft. These islands will be constructed of gravel and
25 will have slope protection to insure slope stability.

1 The main production island is, as with the
2 others, located about two miles offshore. Again,
3 will include the same drilling and well operations
4 facilities for up to 80 wells. This including the
5 one or more drilling rigs, drilling support equip-
6 ment, and the well manifolding and well test facili-
7 ties were also included on the satellite islands.
8 This island is expected to be approximately 1250
9 feet by 1350 feet in dimension. It will also be
10 constructed of gravel and adequately slope pro-
11 tected for erosion protection. In addition to the
12 facilities that I've noted, this island will also
13 contain all the main field production processing
14 and support equipment for the development. This
15 will include the fluid separation handling facili-
16 ties to separate production, to produce fluid from
17 the three islands, the water, oil and gas. The
18 oil will then be dehydrated and ready for sales.
19 The gas handling facilities on the island will in-
20 clude both gas dehydration and gas compression
21 equipment. The compressed gas will be available
22 both for gas sales, possible gas injection for
23 pressure maintenance purposes, as well as compressed
24 gas that, as I noted earlier, will be used on each
25 of the three drilling production islands for

1 The actual facilities on the islands will in-
2 clude on the satellite drilling islands, will include
3 one or more drilling rigs and drilling support
4 equipment, well manifolding and well testing
5 facilities, as well as reserve quarters and other
6 emergency living facilities.

7 The production from the wells on each of the
8 satellite islands will be transported via a subsea
9 produced via pipelines to the main production island.
10 At that point, the fluids will be combined with the
11 produced fluids from the wells on the main island
12 and move on to the separation of processing
13 facilities.

14 Coming back to each of the satellite islands,
15 will be firstly, a pressurized water line, which
16 will be transporting ejection water back to satel-
17 lite islands for re-injection for waterflooding
18 purposes in select wells. It will also be trans-
19 porting in a separate line, compressed gas back to
20 each of the satellite islands, for use in arti-
21 ficial lifting of fluids as needed. There may also
22 be fuel transported back, as well as an expectation
23 of a having power lines transporting -- for dis-
24 tributing our main power to each of the satellite
25 islands.

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artificial lift needs.

The main island will also contain the water handling facilities for the field. This includes facilities for the treatment and re-injection of produced fluids that will be produced from the wells on the three islands, as well as facilities for the treatment and injection of source water that we'll be getting from our waterflood island, I'll discuss in a moment.

Also on this main island will be the power system, the power generation for the field. This will include both the generators and a distribution network of subsea power cables out to each of the three satellite islands.

The last and smallest of the four islands is the waterflood island. This measures approximately 520 feet in diameter. It also is constructed of gravel and will be slope protected. This particular island is located in the deepest water in the project area. At the present time, our base case indicates that to be approximately 18 feet. The purpose of this water depth is to assure us a year-round supply of source water for waterflooding purposes.

This island will contain a waterflood intake structure and a system to transport sea water

1 collected out at the island to the main production
2 island. At the main production, as I noted earlier, the
3 water will be processed, treated and ready for in-
4 jection into each of the three drilling and pro-
5 duction islands for waterflooding purposes. The
6 pipelines that we have in the project include both
7 inter island pipelines connecting the islands as
8 well as the sales pipelines to sales points. With
9 respect to the inter island pipelines, between the
10 satellite drilling islands and the main island, we
11 will have a produced fluid pipeline, transporting
12 produced fluid to the main island. And, as I noted
13 earlier, returning to the satellite islands, we'll
14 have pressurized water for the waterfloods and also
15 compressed gas for the artificial lift. In addi-
16 tion, we're also likely and may have a fuel line.

17 The pipelines that we would have from the main
18 island to the waterflood island include the main
19 source water pipeline, transporting source water
20 to the main island as well as a possible fuel line
21 with returning--fuel line returning to the water-
22 flood island.

23 These pipelines, these inter island pipelines,
24 will vary in size from 6 inches to 24 inches in
25 diameter. They will vary in length from 2 to 2½

1 miles. The material, the pipeline material to be
2 used will vary depending on the service. Each of
3 the pipelines for the most part will externally be
4 coated to protect from external corrosion,
5 methodically protected to prevent erosion or
6 corrosion. They will also be insulated to prevent
7 the heat loss, as well as possibly weight coated
8 to assure negative buoyancy of the pipelines.

9 Internally, where necessary, the pipelines will
10 be protected from possible internal corrosion. This
11 would include possible internal coating of the
12 pipelines, injection of chemical inhibitors, or com-
13 bination of the two.

14 The pipelines, inter island pipelines, will be
15 installed in trenches, which will be pre-dredged
16 And the actual depth of the trenches and the method
17 of covering the trenches once the pipelines are in,
18 will depend on further work, geotechnical work, and
19 study work now underway.

20 The burial of pipelines in trenches is neces-
21 sitated to prevent and maintain project--pipeline
22 integrity from possible effects of ice pounding, ice
23 gouging, and strudel scour phenomena.

24 The pipelines, both the inter island pipelines
25 and sales pipelines, that I'll be getting into in a

1 moment, will be designed, installed and operated
2 with the intent of preventing any sort of pipeline
3 leaks. This will be actually the design
4 philosophy in putting in the pipelines. This
5 leak prevention will result from a combination of
6 proper material selection, proper installation pro-
7 cedure, and the use of proper corrosion control
8 methods where necessary.

9 In addition to the leak prevention methods that
10 I've just described, we will also have leak detection
11 equipment in use. This will include both continuous
12 leak detection devices. These would involve, for
13 the most part, the monitoring of flow and pressure
14 deviations in the pipelines. In addition to the
15 continuous methods, we'll also have periodic methods
16 of leak detection, including obviously visual sur-
17 veillance. In addition to that, the use of periodic
18 use of internal pipeline monitoring pigs -- inspec-
19 tion pigs.

20 Further, the pipelines will have adequate
21 freeze protection systems employed. This will in-
22 clude methods such as insulation and minimum flow,
23 and where necessary, line displacement.

24 I'd like to move on now to description of the
25 sales pipelines. There are two pipelines planned.

1 One, being an oil sales line, the other being a
2 gas sales line. Both of these are in the base case
3 planned to be sixteen inches in diameter. The oil
4 will be transported from the main production island
5 to the TAPS Pump Station Number 1. The gas pipe-
6 line will go from the main island to the proposed
7 Alaska Gas Conditioning Facility.

8 Two alternatives were examined very carefully
9 through our conceptual design work for the routing
10 of these pipelines. And I'd like to go through
11 those briefly.

12 Firstly, we have the Sag Delta route. In this
13 case the pipelines came ashore, buried in a gravel
14 causeway. At that point they continued burying it
15 in a gravel causeway approach for another mile and a
16 half. At that point they come above ground and con-
17 tinue on elevated pipeline supports through the
18 Delta area over to the Drill Site 9 location. At
19 this point they join existing pipeline corridors and
20 continue on to past Pump Station 1 and future AGCF.

21 In this particular case, adjacent to the pipe-
22 line along that route, we have a access road--gravel
23 access road and the necessary work path for the
24 pipeline. The access road will come along the same
25 route and connect to the existing road system--

1 Prudhoe Bay road system, over at Drill Site 9. The
2 alternative to this route that we examined was what
3 we call the West Dock pipeline route. In this
4 case the pipelines are buried in a subsea trench
5 that goes from the main production island over to
6 Prudhoe Bay West Dock. At this point they come on
7 dock and continue buried in gravel (indiscernible--
8 coughing).

9 What I'd like to do now is touch on the camps that
10 are being proposed. We have two major camps. One,
11 being a base operations camp, the other being a main
12 construction camp. Both of these are located
13 approximately six miles from the main production
14 island in the Delta Uplands. They are contained
15 or in our base case included on the same gravel
16 path, approximately a 50 acre site.

17 The base operations camp would be a permanent
18 facility, designed to house approximately 260 peo-
19 ple. It would include facilities for living quar-
20 ters and administration facilities, waste, water and
21 sewage treating equipment, as well as power genera-
22 tion of the support equipment.

23 The main construction camp, located in our base
24 case on that same site would house up to 750 peo-
25 ple. This camp would operate throughout the period

1 of construction. This time is undetermined as yet,
2 because of the uncertainty in the timing of the in-
3 stallation of possible future increments for the
4 project. Facilities for the main construction camp
5 would include living quarters for the construction
6 personnel, the waste, water and sewage handling
7 equipment needed, material and fuel storage areas,
8 as well as power generations. If, as noted, in our
9 base case that's shown here, the camps are located
10 adjacent to one another, the support facilities
11 will be shared to the extent possible.

12 In addition to the main camps that I've just
13 described, we are also -- possibly we'll have small
14 temporary camps adjacent to gravel mines, in the
15 event that onshore gravel sites are utilized.

16 In terms of gravel requirements, we're estimating
17 at the present time, we'll need approximately 8 mil-
18 lion cubic yards of gravel for the project. This
19 will include approximately 4 million yards of
20 gravel for the islands, an additional 2½ million
21 yards for causeway and causeway approach, and an
22 additional 1½ million yards for the road system, and
23 pipeline and camp work paths. The sources of gravel
24 have not yet been determined. Several onshore and
25 offshore sites are currently being examined,

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although no decision has been made, or no preference been made on an established site. The transportation and placement of the gravel will, obviously, depend on the location of the gravel source. (Next slide, please.)

I'd like to now just briefly describe our project schedule as we see it happening now. Detail design is expected to start in the second quarter of 1983 and continue through the end of 1985. In mid-1984, we expect to see a major financial commitment being made to develop the project. This decision will be made following the receipt of project permits. At this point in time we would order the long awaited equipment required for the project, as well as starting site preparation work on the North Slope.

The construction of access roads, construction camp and the pipeline work paths would begin in (indiscernible--coughing) 1984. The gravel island and causeway construction, looking at the same line would begin approximately mid-1985. Also in mid-1985 we would start building modules -- module construction would begin in the Lower 48.

The drilling of wells is expected to begin, as shown here in early 1986. As soon as the islands

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are ready, the pre-drilling of a certain number of wells before facility is started is necessary to have sufficient well capacity to start the facilities.

Also, in late 1985, we're indicating the start of pipeline construction work carrying on through 1986. We'll begin installing modules and process equipment, that major work activity occurring after our major sea lift in 1987.

The start of production for the project is shown as mid-1988 -- we're indicating project start up. And the last line here, future increments, the design installation of those increments will proceed, as has yet to be determined. (Can I have the first slide again?)

I'd like to just briefly recap what we have here -- what we're proposing. A total of four gravel islands, a main drilling production island, two satellite drilling islands, a waterflood island, pipelines, subsea pipelines connecting the four islands together, as well as oil and gas product pipelines to sales points at Prudhoe Bay, a gravel causeway connecting the main island to shore, an access road continuing through the Delta to existing road systems at Prudhoe Bay, and the main

1 construction camp, and base operation facility lo-
2 cated in the Delta Uplands. That concludes my pre-
3 sentation.

4 MR. MC DONALD:

5 Thank you, Dan. You'll have an opportunity to
6 ask Dan some questions shortly following my presenta-
7 tion.

8 The second topic that I want to discuss today,
9 briefly, is that of the scoping process. That's
10 the reason why we're here. I'm sure you're all
11 aware of the fact that the Council on Environmental
12 Quality requires agencies to use an early scoping
13 process for determining issues to be addressed in
14 the EIS and for identifying the significant issues
15 associated with the proposed action and the alter-
16 natives.

17 And the public scoping process basically con-
18 sists of three parts or three steps. The first
19 step is to gather all the public concerns, and
20 that's what we're doing throughout this week and
21 throughout the other three public meetings at the --
22 that Colonel Saling was talking about.

23 The second step is to then take and analyze that
24 information -- analyze the issues and concerns that
25 were identified.

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And then lastly, to go ahead and then from that process, identify the significant issues.

The scoping process we are in today represents the first step in the process. The final product of the scoping process will be a final report that we will send out. This document will, in essence, identify the issues raised at the public meetings, along with the analysis of all these issues, and how the significant issues will be handled in the EIS. And this document will be indeed sent to all the folks that have -- that are on the mailing list and that have indicated that they would like to receive additional information for this project.

It is important to recognize that we are here learn today. We're not here to tell you all about the project we know, but we're here to learn about your concerns, so that we can, indeed, include those in the Environmental Impact Statement. And we do want to encourage active participation later on when we open the session up.

The last topic that I want to generally discuss is the summary of the EIS process. For those of you who are familiar with the EIS process, this is old hat, but for some of the others it might be good to go ahead and review the EIS process. And

1 also we want to generally discuss the tentative
2 schedule that we've identified for preparation of
3 the EIS.

4 The first task of public scoping, obviously
5 that's where we're at today, and we hope to have
6 that scoping process finalized in the near future,
7 within, say, the middle part of February. The
8 study plans -- finalized study plans, is a pro-
9 cess whereby we will go ahead and take the input
10 that we have received from the scoping process and
11 develop detailed study plans which will direct our
12 discipline specialists to go about conducting their
13 impact analysis. And this will indicate basically
14 the schedule that they'll be following along with
15 the scope of work.

16 The next task of base line data collection and
17 review, as Colonel Saling indicated, one of the
18 major assumptions that we are making on this
19 particular project is that there is an adequate
20 base line data available. As a lot of you are
21 aware that there have been many studies conducted
22 throughout the last two or three years in the pro-
23 ject area. And we are assuming that, based on what
24 we know today, no additional field base line data
25 will have to be collected. Obviously, if there's

1 something that would come up through the scoping
2 process, or through our analysis process that would
3 require us to identify data gaps, we would have to
4 do that in conjunction with direction from the Corps
5 of Engineers.

6 I think it would be appropriate to basically sum-
7 marize some of the field studies that have been con-
8 ducted in the immediate project area. There are
9 four major ones that have been conducted, along
10 with several minor ones. One of the first ones is
11 the Biological and Archeological Investigations of
12 the Road Corridor and Pipeline Route through the
13 Sag Delta, which was conducted in 1981. The second
14 study is the Marine Environmental Studies near the
15 Sag River Delta in 1981. The third one is the
16 Under-Ice Survey of Overwintering Fish in the Sag
17 River in the vicinity of the Sag River, which was also
18 conducted in the winter of 1981 and 1982. And then
19 lastly, the Summer Environmental Studies of 1982,
20 which have not -- the final results have not been
21 finalized yet, for that particular study.

22 It is important to note that we do have two
23 subcontractors that are supporting us on this study,
24 and that is LGL and Nortec, who are providing base
25 line support and also participating in impact

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analysis.

The next task of impact analysis, basically, is where we go back doing the hard, rigorous analysis required by means of -- to determine impacts of the proposed action and the alternatives.

It's also important to note during this particular task, that specialists will also be identifying any mitigation majors to lessen the adverse impacts on the environment. And at the same time, if there are any alternatives that are identified that would reduce the impacts, they would also be identified at this point in time.

And the outcome of Task 5, then, is the preparation of the draft of the Environmental Impact Statement, where we basically take and consolidate all the information concerned with base line and the affected environment and impact analysis. What we're planning on now is that the draft EIS to be, hopefully, out on the street in October of 1983. With following that point in time during the public review phase, we'll also have a hearing, which the Corps of Engineers will schedule at a later date.

The last task is the preparation of the final Environmental Impact Statement, which basically consists of responding to the agency and individual

1 review comments on the draft document, and making
2 any corrections in analysis that might be required
3 as a result of these review comments. Obviously,
4 the magnitude of the revisions will be a direct
5 comparison of the types of comments that will be
6 received on the document. On the bottom of the
7 draft, we have the tentative schedule, and that's
8 exactly what it is at this point in time, without
9 having input from the scoping process we took our
10 best stab at trying to identify the schedule. It's
11 fair to say, that based on the output of scoping,
12 the schedule may be compressed or it may be ex-
13 panded. It's very tentative at this point in time.

14 In summary, I think it'd be good to basically
15 indicate to you some of the issues and concerns
16 that we have identified. Obviously, this is not an
17 exclusive list, and that's the purpose of scoping,
18 but in order to start the process and provide some
19 issues and concerns that we have identified, we
20 generally identified these eight which were in your
21 scoping brochure, which consists of: water quality,
22 fish migration effects, effects on the snow goose,
23 nesting and rearing habitat, effects of discharging
24 drilling mud and cuttings, effects of the project
25 on the Boulder Patch, disturbance of bowhead whale

1 and any other marine mammals, effects on caribou
2 use, and risk analysis associated with ice over-ride
3 and lastly, risk analysis related to wellhead
4 blowouts.

5 Here again, I don't want to warn you, this is
6 not an exclusive list, but just to start the ball
7 rolling. Later on when we open up, these are some
8 of the tentative issues and concerns that we have
9 identified. Colonel, with that is a brief run down
10 of the second part of our agenda, I'll turn this back
11 to you now for some questions.

12 COLONEL SALING:

13 Okay, we have the technical presentation on the
14 features in the project that have been looked at to
15 date. And we have a description of the environ-
16 mental impact side and the scheduling.

17 What I'd like to do now is to open up for ques-
18 tions for these two gentlemen, and then we'll take
19 a break and go on to your statements. So let me
20 have your questions and I'll ask them to the appro-
21 priate person now.

22 Yes?

23 UNIDENTIFIED SPEAKER:

24 (Inaudible question.)

25 MR. HUXLEY:

1 Generally, the exploration islands
2 have been considered the smaller. For the most
3 part been designed to handle no more than maybe one
4 to three wells. I don't have an exact size of one
5 of the current islands. Does anybody happen to
6 know what the size is?

7 UNIDENTIFIED SPEAKER:

8 350 to 400 feet.

9 MR. HUXLEY:

10 350 to 400 feet, that compared to on our
11 satellite islands approximately 750 by 1000. The
12 main island, upwards of 1250 to 1350 and the water-
13 flood island, somewhere near 520.

14 UNIDENTIFIED SPEAKER:

15 (Inaudible question.)

16 MR. HUXLEY:

17 Yes, the exploration islands were designed for
18 the purpose of exploration; thus, they weren't put
19 out there for the purpose of a twenty to thirty year
20 project life. The actual design parameters that
21 will go into our islands have not yet been deter-
22 mined. This will be one of the efforts in going
23 through in our preliminary detail design phase. As
24 part of that we will be collecting oceanographic
25 data. And with that we will be making our efforts

1 to predict storm surges, storm frequency periods to
2 assure ourselves that the islands are -- have
3 sufficient free board to protect them from waves
4 and storm action. Work has been done and continues
5 to be done on Slope protection methods, to try to
6 determine what we see as being the most effective,
7 and particularly from the standpoint of a Slope
8 protection system that will be in place and have to
9 continue to operate and serve the islands for many
10 years. The islands will also be designed in both
11 in size and styling for purposes of resisting ice
12 forces--the ice over-ride conditions that are certain
13 factors that occur in the delta area.

14 COLONEL SALING:

15 Additional questions? Yes, sir?

16 UNIDENTIFIED SPEAKER:

17 He has described protection being developed
18 with the island--but what about a two mile causeway
19 when you have two miles of exposed area. Will the
20 pipeline be buried under the causeway, so that it
21 is protected from a possible ice over-flow, or would
22 it be buried on top of the causeway. And if so, what
23 provisions are made for the flow of water through
24 or to pass through the causeway?

25 MR. HUXLEY:

1 The causeway itself will be designed in a simi-
2 lar manner as I've described on the islands to re-
3 sist ice forces. This will depend, certainly, on
4 what part of the causeway you're in. It's (indiscernible)
5 likely the shape of the causeway will vary because
6 of the fact we are getting into deeper water as we
7 approach the main island and greater ice forces
8 are expected. The causeway will also be designed
9 with slope protection methods systems to provide
10 Slope stability. With respect to pipelines,
11 those plans are to bury those pipelines in the
12 causeway, not under the causeway, but in the cause-
13 way to protect them from possible ice over-ride.
14 As far as water paths through, we have done some
15 work and continue to do work on measurements in the
16 area for flows, and we're also doing some modeling
17 work at the present time to try to determine the
18 effects of the causeway on the flow, particularly
19 in the case we have here where we are in a delta
20 region.

21 COLONEL SALING:

22 Yes? I forgot one administrative...for the
23 record, would you please state your name as you
24 start to state your question?

25 UNIDENTIFIED SPEAKER:

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(Inaudible question.)

MR. MC DONALD:

To answer your question, no not at this point in time. That will be the part of Task 2 -- develop in detail a study plan. If you've got some concerns on that, we'd certainly like to hear about your concerns later on during the public session--the open session.

COLONEL SALING:

Additional questions?

I don't want to cut them off; and if in fact, during the open session which follows the break you do have some questions, we'll address those. Then also along with statements...but I did have a hand over here.

JUDY ^{Gottlieb}~~COTLIN~~ (phonetic)

When are the meetings planned on the North Slope?

COLONEL SALING:

Barrow is this Friday, Nuiqsut is the 27th, and Kaktovik is the 28th, and Fairbanks sometime the second week in February.

Okay...ya? Just made it.

UNIDENTIFIED SPEAKER:

When do you plan to close the formal scoping

1 period? Any established deadline for written sug-
2 gestions on the scope of the EIS?

3 COLONEL SALING:

4 Thirty days.

5 UNIDENTIFIED SPEAKER:

6 Thirty days from now?

7 COLONEL SALING:

8 Yes.

9 UNIDENTIFIED SPEAKER:

10 Thank you.

11 COLONEL SALING:

12 Okay, let's take about a fifteen minute
13 break. Those of you who filled out those cards, if
14 you would just put them here on the corner, and t
15 Bob and I can use those as a basis for calling on
16 those people who have comments.

17
18 (Whereupon the hearing recessed for a short break.)

19
20 COLONEL SALING:

21 I have only four cards so far, does anybody else
22 got one squirreled away some place that didn't get
23 up here to the front table? Okay, well, we'll pro-
24 ceed with these. What I'd like to have as I call
25 your name, and as you note, I'm shuffling these so

1 that there's no question about sequence. I'd like
2 to have you come up and identify yourself and then
3 indicate whatever -- say whatever you'd like to
4 say. If it's a question, fine, we'll try and an-
5 swer it, if it's a statement, good for you.
6 But, please come up to the front podium. So, after
7 shuffling these, Rosa ~~Vihan~~ (phonetic).

8 MS. ~~VIHAN~~ *Meehan*

Meehan

9 My name is Rosa ~~Vihan~~ *Meehan* and I'm presenting testi-
10 mony for the U.S. Fish and Wildlife Service.
11 We have several concerns regarding the impacts
12 of the proposed project on fish and wildlife.
13 The proposed development is located in an environ-
14 mentally sensitive area adjacent to the delta of
15 a major North Slope river, near the only nesting
16 colony of snow geese in Alaska. And adjacent to
17 and actually infringing upon the Stefansson Sound
18 Boulder Patch, a unique benthic community.

19 Our specific major concerns are potential im-
20 pacts to the snow goose colony. This colony is a
21 geographically isolated individual colony, and al-
22 though individual snow geese have been noted to nest
23 in other places along the North Slope, this colony
24 is still unique and of great concern to our agency.

25 Snow geese are particularly sensitive to

1 disturbance. And it will be difficult, if not
2 impossible, to predict the impacts of construc-
3 tion and operation of the project on the nesting
4 geese. Additionally, measures to accommodate
5 passage of flightless geese traveling across the
6 delta will have to be developed and incorporated
7 into the project design. Further studies on the
8 return rate of the snow geese to the delta should
9 be conducted, so that the ultimate impacts on nest-
10 ing can be predicted with greater confidence.

11 Another major concern to our agency is a pro-
12 posal of another causeway, prior to receiving sub-
13 stantive information on the impacts of Prudhoe Bay
14 waterflood extension. Review of this causeway
15 proposal, using a worst case scenario, as was done
16 for the Prudhoe Bay waterflood extension, would
17 not be appropriate. Our primary concern is that of
18 the potential impact of the causeway on the move-
19 ment and distribution of anadromous fish, which
20 is related to potential changes in the near
21 shore hydrographic regime.

22 A reasoned risk analysis of the proposal and
23 the alternatives' potential impact must be conduct-
24 ed.

25 A third major concern of our agency is location of

1 the waterflood island in the Stefansson Sound
2 Boulder Patch. The proposed island would cover
3 approximately 10 acres of the Boulder Patch. The
4 increased turbidity and sedimentation during is-
5 land construction may adversely affect the kelp's
6 annual growth and potential for recolonization.
7 Operation of the waterflood intake will entrap and
8 entrain motile organisms. Of particular concern
9 are the larval fish in the area.

10 Additionally, impacts will be caused by the
11 filter backwash. The EIS process should be used
12 to find a more suitable, i.e., environmentally
13 acceptable location, unless substitute evidence
14 can be presented, that the impact will be minimal.

15 Another concern of our agency is the impact
16 of extracting 8 million cubic yards of gravel
17 that would be required for the project. The
18 potential mine sites need to be identified early,
19 and measures to minimize the impacts developed
20 and included in the review process. Impacts due
21 to the removal of the gravel required for the
22 causeway construction must be included in an eval-
23 uation of that alternative.

24 Another concern is the location of the base
25 operations camp. In this regard, the impacts of

1 extending the support facilities out onto the
2 delta versus consolidation of support facilities
3 within the Prudhoe Bay unit; need to be considered.

4 A final issue is the cumulative effects of
5 this project and other development or reasonably
6 foreseeable development in the near shore Beaufort.
7 This issue needs to be discussed in the EIS.

8 COLONEL SALING:

9 Good, thank you very much.
10 David ^W/~~R~~igglesworth (phonetic).

11 MR. ^W/~~R~~IGGLESWORTH:

12 Hello, my name is David ^W/~~R~~igglesworth and I'm
13 here speaking for the Alaska Center for the
14 Environment. And we are pleased to be given the
15 opportunity to testify here.

16 We are concerned primarily about the manage-
17 ment of the drilling muds and associated produced
18 waters with regards to this project. We're con-
19 cerned about the lack of federal and state pro-
20 grams in Alaska geared toward the development of
21 proper standards and permit procedures for the
22 discharge of drilling muds into reserved pits, or
23 whatever, associated with oil and gas operations.

24 Our anxiety is heightened by the fact that,
25 both the Federal Resource Conservation Recovery

1 Act and the State's proposed draft, hazardous
2 waste management program and regulations fail to
3 comprehensibly address the issue of drilling muds.
4 In fact, both programs exempt muds from any form
5 of regulatory control. This factor, looked in
6 conjunction with the anticipated growth of oil
7 and gas exploration state-wide, poses a poten-
8 tially serious threat to Alaska's wetlands and
9 associated wildlife that inhabit these areas.

10 Our concerns regarding drilling muds and addi-
11 tives are four-fold. First, while muds themselves
12 are not necessarily harmful to wetland ecosystems,
13 the additives, like *lignosulfates, salts, naphthalene,*
14 *Caustic soda, and para-formaldehyde*
15 injected into the muds in the proper concentra-
16 tions deleterious to the life forms inhabiting
17 these wetland areas. A Canadian Study addressing
18 the acute toxicity of drilling muds on fish con-
19 cluded that drilling muds were acutely toxic to
20 both local fish in the McKenzie River Delta and
21 Canadian *bioassay* fish, rainbow trout.

22 In the past, drilling muds and mud reserve pits
23 have been excavated near rivers and wetlands in
24 Alaska. A reserve pit created along a section of
25 the *Putuligayuk* River is just one example of this

1 phenomena. In the event of a river flooding and/or
2 the reserve pit overflowing, the muds would enter
3 and contaminate the river system.

4 Second, the present construction designs for
5 reserve pits are insufficient.

6 Third, there are many studies investigating
7 the acute toxicity of drilling muds to fish and
8 other wildlife. While relatively few studies have
9 addressed the issue of chronic toxicity of drilling
10 muds, we would like to see more study in this area.

11 Fourth, there are approximately 200 miles of
12 roads at Prudhoe Bay. In the past, the State has
13 issued permits allowing the discharge of drilling
14 muds and oils along the roads to control dust. We
15 are concerned that non-target areas off the road
16 system could become contaminated due to run-off.

17 In essence, the Alaska Center for the Environ-
18 ment is troubled by the fact that drilling muds
19 from oil and gas operations are being disposed of
20 without a proper management program and without
21 foreknowledge of their effects on wet and dry land
22 areas in the State.

23 We ask that a comprehensive drilling mud pro-
24 gram be included in any type of EIS process regard-
25 ing this project. Included in the programs -- should

1 include such specifics such as a list of the types
2 of muds and additives used by oil and gas indus-
3 tries. Second, standards for the concentrations
4 of hydrocarbons and other additives present in the
5 muds at the time of their disposal. And these
6 standards should be based on acute and chronic
7 toxicity reports. Criteria for disposing of highly
8 toxic muds and a monitoring system that tests the
9 areas wherever muds are disposed.

10 The program should be established on a site
11 specific basis. And that is in the case of say
12 reserve pits, where reserve pits are excavated on
13 wetlands or they could impact wetlands and water-
14 ways. Specific permits and requirements would be
15 developed for that particular area. Whereas, those
16 areas not adjacent to areas or specifically not
17 adjacent to a really fragile wetland or wildlife
18 ecosystem, those pits could fall under a more gen-
19 eral permitting program, thereby speeding up the
20 permit process in these particular areas.

21 In the final analysis, present management of
22 drilling muds in Alaska is entirely inadequate.
23 We feel the drilling muds under their present man-
24 agement threaten Alaska's fragile wetlands and in-
25 land areas. And we hope that steps are taken to

1 protect these priceless areas. Thank you.

2 COLONEL SALING:

3 Thank you.

4 Rosa, did you want to get a copy of the

5 transcript?

6 MS. ~~VIIHAN~~ ^{Meehan}:

7 Yes.

8 COLONEL SALING:

9 Okay, let me check that. Okay...Robert

10 Mintz.

11 I'll ask you the same question then, do you want

12 to get a copy of the transcript?

13 MR. MINTZ:

14 (Inaudible response to question.)

15 My name is Robert ^{tz} ~~Minck~~, and I'm here speaking

16 for Trustees for Alaska.

17 I was pleased to see in your description of

18 the scoping process, the Corps' emphasis on alterna-

19 tives, because I think that's a vital element of

20 the EIS process which will help inform the ultimate

21 decision-making. I just have a couple of points

22 that I'd like to mention on some alternative con-

23 cepts that I think should be addressed in the EIS.

24 One has to do with the question of gravel usage.

25 Not only the extent of gravel and the implications

1 for impacts of extraction as Ms. Vihan mentioned,
2 but also whether or not there are alternative struc-
3 tures or approaches to the development project
4 facilities that would not need as much gravel or in-
5 deed, any gravel.

6 Perhaps Mr. Huxley or someone else could tell
7 me right now whether that has been considered so
8 far in your plan -- the use of non-gravel structures
9 for the production facilities.

10 MR. HUXLEY:

11 The use of non-gravel structures has been con-
12 sidered. The preliminary findings indicate that
13 these sorts of structures that I'm sure we'll see
14 employed in some of the deeper waters, are indeed
15 more applicable to deeper water areas. And the pro-
16 ject area we're involved with, three of the four
17 islands will be located in very shallow water, from 4
18 to 8 ft. deep and our indications thus far -- and our
19 studies thus far have indicated that a gravel island
20 is the preferred construction and the far less costly
21 kind of construction.

22 MR. MINTZ:

23 Would it be fair to say that this is something
24 which the contractor still intends to investigate
25 as an alternative?

1 MR. HUXLEY:

2 We don't have any present plans at this time
3 to do any further work in looking at alternative
4 structures. At this time we feel that the base case
5 that we've selected and run through our conceptual
6 design, that being gravel islands, is the prefer-
7 red method of construction.

8 COLONEL SALING:

9 Let me respond to that. I hear what you're say-
10 ing that...let me try to clarify that.

11 Are you indicating that you would like to have
12 us take a look at the non-gravel structures in the
13 EIS as an alternative?

14 MR. MINTZ:

15 Definitely.

16 COLONEL SALING:

17 Okay. All right. That definitely will have
18 to be looked at in the EIS process. That will be
19 addressed, and the level of detail will be commen-
20 surate with the impacts associated with that.

21 MR. MINTZ:

22 Cause of course the economic comparison between
23 gravel and non-gravel alternatives depends on the
24 cost of extracting the gravel. And that's why--
25 another reason why I think it's important to assess

1 the implications of the construction on the demand
2 for gravel and where it might be taken from and
3 what the environmental, as well as the economic
4 costs are.

5 A different area which I think alternative
6 approaches need to be investigated is in the sea-
7 sonal variations or restrictions on various acti-
8 vities--construction, drilling and so forth. As
9 I'm sure all of us know, seasonal variation in
10 biological activity and environmental hazards and
11 so forth are extremely important on the North Slope
12 and the Beaufort Sea. And the possibility for sub-
13 stantially mitigating possible impacts on the en-
14 vironment and on wildlife are there in terms of
15 varying when the activities take place. Especially,
16 of course, avoiding critical wildlife functions
17 such as nesting and other things which mainly occur
18 during the summer months. So again I recommend that
19 the EIS look closely at alternatives and mitigating
20 measures concerned with seasonality.

21 I'd also hope the EIS will investigate the ques-
22 tion of oil spill clean up and prevention capa-
23 bility. This is, I suppose, the only opportunity
24 for EIS process and the entire development of this
25 project because it's on State tracts. And the

1 adequacy or inadequacy of oil spill clean up
2 technology is a recurrent question which has not
3 yet been satisfactorily resolved. I think that
4 past experience in the oil industry indicates
5 that the rate of loss of well control with blow-
6 outs tends to be substantially higher in the de-
7 velopment phase, for whatever reason. And given
8 the fact that we're talking about hundreds of
9 wells, we're confronting, really, a possible risk
10 of oil spills which is in order of magnitude, more
11 greater than what we've confronted in the past.

12 Finally, I'd just like to reemphasize a point
13 which was earlier made about, looking at the ques-
14 tion of the location of the onshore facilities.
15 And the possible consolidation of such facilities
16 in the existing Prudhoe Bay are, rather than in-
17 truding new facilities into the Sag Delta area.

18 Also, in terms of the causeways, one area of
19 alternatives which I think should be assessed, is
20 the question of open or continuous flow causeways
21 allowance for greater water circulation. I don't
22 know whether it's even in the cards in terms of
23 feasibility, to consider non-causeway structures,
24 such as pilings or bridge type structures. If it
25 is, I would hope this would be assessed as well.

1 Thank you.

2 COLONEL SALING:

3 Thank you.

4 Richard Sumner.

5 MR. SUMNER:

6 We have a two-part show.

7 COLONEL SALING:

8 Huntley-Brinkley?

9 MR. ~~STEINWIRE~~^{Steinborn}:

10 Yes. I am not Richard Sumner. I'm Dan
11 ~~Steinwire~~^{Steinborn} (phonetic). I'm routinely here with EIS
12 to do with EPA. And we've got two pieces, and
13 Richard kind of fits in the middle.

14 The first thing that I'd like to address is
15 the schedule for the EIS. We're talking, it looks
16 like about a year and a quarter from start to
17 finish, and that's a very ambitious schedule. What
18 that requires, among other things, is that we--the
19 EPA and the Corps and the other agencies and spon-
20 sors do everything right the first time. There's
21 no time for mistakes in a schedule like that. In
22 some projects we've been able to do that,
23 like on the Alpetco Refinery Project,
24 and on some we haven't. And when we make mis-
25 takes just takes a lot longer.

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And the first thing that leads to is the kinds of data gaps that we've been able to see in the information that we've seen so far. First, in terms of the information that's available about the proposal, I see nothing about the field size, about the production rates over time, other than a maximum, nothing on the physical dimensions of the field, only average numbers for discharge rates, no numbers for air pollutant emissions at all, nothing on the fate of produced formation waters, nothing on waterflooding rates--how much water are they going to withdraw over what period of time, how fast they'll reinject it. We haven't seen a water budget or a gravel budget, per se, there's just lots of data gaps on what the proposal entails. As well--I've seen nothing on the life cycle costs, so we could get an idea of what the cost of the time would be and how significant any environmental protection requirements might be in terms of actual cost.

There are similar gaps in the environmental data--at least that which is available in the environmental overview. For instance, the water quality contains no base line data on hydrocarbons in the water in the area, or on dissolved oxygen

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or nutrients. It basically is limited to salinity, temperature and temperature data--there's no suspended sediment data. And those kind of data gaps would need to be filled before it can really start doing an analysis of the effects of the project.

The second major topic is alternatives, and some of the folks have already addressed that. Alternative alignments for the pipeline, not just the major alignment--the differences that we saw earlier this morning, but alternative alignments within the corridor to minimize the effects of the pipeline and the access road on wetland habitats.

Alternative locations for the waterflood island. It seems to us that you could move that island just marginally and remove its footprint from the Stefansson Sound Boulder Patch.

Alternative gravel extraction sites, perhaps changes in the locations of the production island if their impacts that result from where they're located. They could be mitigated easily by shifting them in one direction or another.

Rick Sumner is going to come up and talk in more detail about the other kinds of effects we're concerned about--basically on the placement of

1 structures and on water quality habitats.

2 COLONEL SALING:

3 Fine, thanks. Ya, come on up.

4 MR. SUMNER:

5 My name is Richard Sumner. I with the
6 Environmental Protection Agency here in the
7 Anchorage office. I'd like to express a few com-
8 ments and observations, again, more specifically
9 related to the dredge and drill components of this
10 project.

11 To begin with I'm most interested in the--
12 primarily the causeway. We're looking at water
13 quality concerns, generally relating back to cir-
14 culation. We'd like to see some modeling of cir-
15 culation surrounding any proposed causeway, and
16 this needed to address littoral drift
17 changes in local hydrological regime within the
18 delta. Water quality across the causeway, and
19 on that water quality, at least salinity, tempera-
20 ture differences and turbidity trajectories caused
21 by that causeway. Also get into longshore nutrient
22 transport and trial discharge effects--how the
23 causeway will affect these discharges from the
24 Sag River. Again, these all--these water quality
25 perameters all relate back to anadromous fish

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movement--movement epifaunal within the local regime and perhaps even bird use of the inshore littoral zone.

The islands themselves apart from the causeway, we're looking also like, Dan mentioned, the footprint each island would place in the area surrounding the Boulder Patch. We're also looking at secondary impacts, we'd like to see a review of secondary impacts associated with construction--turbidity, saltation and such on the Boulder Patch and any subsea trench work which might impact the Boulder Patch area.

To and from the islands, we're looking at barge activity and its effect on birds, fish, perhaps even mammals.

We'd like to see a discussion based on the waterflood I think Rosa mentioned, concerns with the intake at that structure.

Other physical components I'd like to see addressed, again which was mentioned earlier, ice gouging. We're also concerned with subsea permafrost and the specific impact of subsea trenches and causeway placement has on that. Also snow removal from the islands and the causeway itself. The problem with that is usually gravels can be

1 contained within snow during the removal process,
2 and so we begin to have expansion of the fill dis
3 charge.

4 On shore base, we have camps. We'd like to
5 know the exact location of these base camps and
6 also the pipeline land routing across the Sag
7 Delta. This is important so we can discuss and
8 review for issues of overwintering, exit break up
9 and review of the culverting strategy for
10 that roadway. Again, I must emphasize, to be
11 specific on these locations, enough so we can use
12 air photo interpretation to help review the best
13 alignment.

14 The West Dock pipeline route--I'll touch on
15 that briefly again--we're looking at a major dredg-
16 ing operation. We'll be concerned about methods
17 that that alternative--methods that would be used
18 for that dredging, spoil handling disposal, back-
19 filling, and again, effects on permafrost subsea
20 --subsea permafrost.

21 To help our review in any type of draft, I ask
22 that it'd be useful to have a separate section or
23 component of the draft which specifically addresses
24 mitigation and perhaps alternative mitigative
25 strategies. We're looking at, it was mentioned

1 earlier, causeway bridges to increase circulation
2 caused by through the causeway. And then, essen-
3 tially, maintenance and placement of those bridges--
4 maintenance of the water depths underneath those
5 bridges to insure water circulation.

6 We're looking for means to mitigate the impact
7 at landfall, when causeway comes into the shore.
8 Again, this is a very sensitive habitat. Mitigation
9 towards what type of routing flexibility that
10 will be through the onshore operations, camp flexi-
11 bility, reclamation of facilities that will be
12 used just for construction. Mitigating measures for
13 culverting silt curtains -- use of silt curtains
14 for any type of dredging activity and their
15 usefulness. And perhaps you might want to even
16 consider off site mitigation. We will provide
17 more formal comments--this is essentially a list.

18 COLONEL SALING:

19 Thank you very much.

20 MR. ^{Steinborn} ~~STINEWIRE~~:

21 The other areas where we have concern, the most
22 predominant one is the discharge permit which the
23 facility will need under Section 402, the Clean
24 Water Act. And the lead one to cover the filter
25 backwash, drilling muds and cuttings discharge,

1 the desalination discharge, the sanitary discharges.
2 And for us to be able to write that permit, we will
3 need to see what's called an ocean discharge cri-
4 terial evaluation under Section 403C the Clean Air
5 Act. We'd love to have that in the EIS. Par-
6 ticularly because we're talking about drilling
7 muds and cuttings discharges that are in order of
8 magnitude larger than anything that EPA's looked
9 at in this region before. So it's a whole new
10 ball game to us.

11 COLONEL SALING:

12 Tell me the name of that--ocean discharge...

13 MR. ^{Steinborn} STINEWIRE:

14 Ocean discharge criteria evaluation. And the
15 focus of it is on the fate and effects of the
16 discharge on marine biode and marine water qual-
17 ity.

18 And before we can issue a permit for discharge
19 for ocean waters, we essentially have to make a
20 determination that there will be no unreasonable
21 degradation. And there's a series of criteria
22 that we have to address to make that determina-
23 tion. And what we've, in fact our goal is, to
24 try to time it so that we can have the draft per-
25 mit in the draft EIS and do a joint public hear-

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ing.
Second, oil spill risk analyses. The ones we normally see just give a point estimate for what the odds are for spill occurring or how many spills might occur. And we believe that that is a method which has little utility. That at least the one presented in the EIS is a picture of how uncertain the estimate is. Confidence intervals is standard in the air estimate--something that gives readers a sense of really how--that we're just beginning to develop techniques to make reasonable estimates.

Third, air quality. The summary indicates the project only--Prevention of Significant Deterioration permit under the Clean Air Act. The EIS should present emission estimates, describe existing air quality and describe the modeling results --of effects of the project on ambient air quality and on how much of what are called the increments that the project will consume for those for which we have increments, which is sulphur dioxide, and suspended particulants.

Finally, coastal zone management consistency. Often we see EIS's which simply have a one-liner that says the project or isn't consis-

1 tent. We think a more thorough discussion makes
2 a lot of sense and is appropriate. Alaska's pro-
3 gram has standards that are specifically applicable
4 to energy development. They have habitat management
5 provisions that are focused particularly on this
6 habitat. We think the EIS ought to discuss how
7 this proposal, as designed, would conform with
8 those standards and with the goals of those habitat
9 management provisions. And where it doesn't con-
10 form, how it could be modified so it does.

11 That's it.

12 COLONEL SALING:

13 Thank you.

14 MR. ^{Steinborn} ~~STINEWIRE~~:

15 Thank you.

16 COLONEL SALING:

17 Those are the cards that I have up here.
18 However, if I have anyone who would like to com-
19 ment at this time, or has any questions, I'd like
20 to open the floor to you.

21 I don't see any. If you would like to supply
22 us with written comments, we would be more than
23 happy to have you drop us a line over the
24 next 30 days.

25 Thank you very much.