THE STATE of ALASKA
GOVERNOR MICHAEL J. DUNLEAVY

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Site Program

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March 24, 2020

Kelly Nixon
Hilcorp Alaska, LLC
3800 Centerpoint Drive
Suite 100
Anchorage AK 99503

Re: Swanson River Field
2019 Groundwater Monitoring Program Report
ADEC Report Comments

Dear Ms. Nixon:

The Kenai Area Office of the Alaska Department of Environmental Conservation, Contaminated Site Program (ADEC) has reviewed the 2019 Groundwater Monitoring Program Report for the Swanson River Field, dated December 2019.

We have reviewed this report and offer the following comments at this time:

1) At Tank Setting 1-9, well TS1-9A, there was a trace of product for the first time in of 20 years of sampling. Please comment on the significance of this.
2) Tank Setting 1-4. Recommendations call for resurveying two wells. Would it be prudent to survey all of the wells at once?
3) Tank Setting 1-9. The groundwater contours are inaccurate, and don't reflect the groundwater elevation at the well, misrepresenting groundwater flow patterns. In future reports, present groundwater contours that honor groundwater elevation data.
4) Tank Setting 1-33: Groundwater contours are problematic at this location. Well FS1-33F groundwater elevation data is not honored. What is the explanation be for the depression of groundwater at well FS1-33O? The groundwater flow vectors are the opposite of what is represented on the map at well FS1-33S, T & W. Groundwater flow vectors must cross groundwater contours at right angles.
5) Tank Setting 3-4: Wells TS3-4P and TS3-4D groundwater elevations are not honored in the groundwater contouring. With the significant product layer in TS3-4D, product could be moving toward the bluff at the wetland, north of well TS3-4MM. Please evaluate flow patterns, and swamp

elevation in relation to water table and the potential need for a new well north of TS3-4MM. A case for not drilling a new well could be made from historical soil borings. Please evaluate.

6) Tank Setting 3-9: There is a wide range of groundwater flow directions depicted at the site, yet some data points are not honored. It appears that known contaminant distribution is not compatible with the groundwater contours as presented. Contours at well TS3-9BB are not honored and groundwater flow direction at well TS3-9T is indicative of the problem. Please evaluate.
7) What is the source of contamination at well TS3-9V? Did the 1991-1994 investigation determine this and delineate the source and extent?

If you have specific questions regarding these report comments, you can reach me at 907-262-3412 or via email at peter.campbell@alaska.gov.

Sincerely,

Peter Campbell

Peter Campbell
Project Manager
ADEC Contaminated Sites Program

cc: Jennifer Anderson, Brice Environmental Services