



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

**Department of Environmental  
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE  
Contaminated Sites Program

43335 Kalifornsky Beach Road, Suite 11  
Soldotna, Alaska 99669  
Phone: 907-262-5210  
Fax: 907-262-2294  
dec.alaska.gov

File: 2320.38.031, 2320.38.029

July 7, 2021

Kelley Nixon  
Hilcorp Alaska, LLC.  
3800 Centerpoint Drive, Suite 1400  
Anchorage AK 99503

Re: KGF 3431 & KGF 14-6  
Hazard ID: 3331, 2434  
Contaminated Soil and Water Management Plan for KGF 14-6 Pig Launcher Excavations  
Kenai Gas Field 3431 and Kenai Gas Field 14-6

Dear Ms. Nixon;

The Alaska Department of Environmental Conservation Contaminated Sites Program (ADEC), has reviewed the Contaminated Soil and Water Management Plan for KGF 14-6 Pig Launcher Excavations: Kenai Gas Field 3431 and Kenai Gas Field 14-6, Jacobs Engineering (July 2021). Thank you for submitting the Plan to our office. ADEC disagrees with the assessment on page 4 that, "There is currently no known soil contamination on the pad." While this may be true in the proposed area of exaction in this plan, it is not the case for the pad as a whole.

The idea that 20 ppm on a PID is a qualifier for determining if soils are impacted is not valid. The qualified person is to use visual cues, odor and field instruments to determine if soils are impacted. Only laboratory results can unilaterally determine if soils meet cleanup levels. The State of Alaska Field Sampling Guidance does not provide for the option of using a PID as an analytical tool to determine if soils meet cleanup criteria. "Absence of positive field screening results or those field screening results below an arbitrary threshold cannot be used as justification for not taking the required number of laboratory analytical samples".

The Contaminated Soil and Water Management Plan is approved. If you have questions about this letter, or any other aspect of this project, please contact me at (907) 262-3412, or by e-mail at [peter.campbell@alaska.gov](mailto:peter.campbell@alaska.gov)

Sincerely,

A handwritten signature in black ink that reads "Peter Campbell".

Peter Campbell

Environmental Program Specialist

Copy via e-mail:

Andrew Tarnas-Raskin, Jacobs Engineering Group Inc.