



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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April 12, 2022

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

Re: Beaver Creek Pad 4 2021 Groundwater Monitoring Program Report
ADEC Report Comments

Ms. Nixon:

On December 2, 2021, the Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC), received the 2021 Groundwater Monitoring Program Report for the Beaver Creek Pad 4 and the Beaver Creek Pad 4 Loading Rack Pad B Line sites. This document was prepared by Brice Environmental. ADEC approves this report and has the following comments relating to future sampling.

Increasing concentrations in AP-38 are contrary to depicted groundwater flow directions. AP-38 has detectable RRO, equal to the cleanup levels. GRO and VOC are slightly decreased and DRO and RRO are slightly elevated over previous sampling events. This indicates that the groundwater monitoring network may not be adequate for representing actual conditions, where groundwater flow in the report indicates that flow from the source area is away from this well. Hilcorp will evaluate the implications of petroleum concentrations at odds with depicted groundwater flow direction.

GRO and benzene concentrations present in AP-39 are not representative of the crude that was released. Continue monitoring this well and evaluate the source of these impacts.

Please document the cumulative product recovered from the monitoring wells and show historical product recovery data.

Please prepare a work plan by July 11, 2022 to investigate anomalies on the north pad. If you have any questions on any aspect of the project, please contact me at (907) 262-3412, or by e-mail at peter.campbell@alaska.gov

Sincerely,

Peter Campbell

Peter Campbell
Environmental Program Specialist

Electronic copies via e-mail:

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