



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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File No. 2320.38.032

April 7, 2020

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

Re: Hilcorp Groundwater Monitoring Well Installation, Decommissioning and Maintenance Plan
ADEC Comments

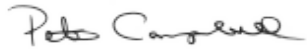
Ms. Nixon:

On February 5, 2020, the Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC), received the Hilcorp Groundwater Monitoring Well Installation, Decommissioning and Maintenance Plan. This document was prepared by Brice Environmental. The work plan is approved with the following condition.

Page 3 of the work plan describes the process of abandoning monitoring well MW-24 on Kenai Gas Field Pad 41-7. MW-24 is being replaced with two new wells because it bridges two aquifers potentially contaminating the lower aquifer, as there can be several feet of LNAPL in the monitoring well casing and there is a downward potential in the aquifer. The work plan calls for using the monitoring well casing as tremie pipe to inject grout. Using the well casing to tremie grout into the formation is not approved. The plan proposes grouting from the top down. Even though the LNAPL will be removed, residual LNAPL and impacted water will be forced into the lower aquifer. Instead, ADEC suggests that after knocking out the well plug, a tremie pipe, (or hose) should be inserted into the well bottom of the well, so as not to flush the entire content of the well casing into the lower aquifer. The casing should be withdrawn as the grout is injected. Alternatively, another method may be proposed to ADEC.

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
Environmental Program Specialist

Electronic copies via e-mail:

Kimi Lloyd – Brice Environmental
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