



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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2334.38.022, 2334.38.024,
2334.38.032, 2334.38.033,
2334.38.058, 2234.38.062

May 27, 2021

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

Re: Swanson River Field
Contaminated Soil and Water Management Plan for 2021 Flowline Installation and Inspection
ADEC Plan Comments

Dear Ms. Nixon:

The Kenai Area Office of the Alaska Department of Environmental Conservation, Contaminated Site Program (ADEC) has reviewed the Contaminated Soil and Water Management Plan for 2021 Flowline Installation and Inspection for the Swanson River Field, dated May 2021. The plan is approved with the following comments at this time:

- 1) We have moved the location of Hazard ID #25242 700 feet west in database (and on our GIS map) according to consultant's recommendation.
- 2) Page 11, last paragraph reads, "Soils will be designated as contaminated for segregation purposes if photoionization detector (PID) readings are greater than 20 ppmV." ADEC highly recommends it should read, "A PID reading above background, along with visual indications of contamination such as sheening, odor and/or staining, will be used to impound contaminated soils." Degraded hydrocarbons, typically found in the gas field, may have low volatile concentrations as indicated by a PID, while still containing contaminants above cleanup levels. A cutoff for a PID reading should be made after laboratory results corresponding to PID readings have been correlated to confirm a range of PID readings for soils that do not exceed cleanup levels on a site specific basis. Page 12 in the last paragraph clarifies the consultant's approach to screening, which is practical.

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,

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

Peter Campbell
Project Manager
ADEC Contaminated Sites Program

cc: Andrew Tarnas-Raskin, Jacobs Engineering