



THE STATE
of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Environmental
Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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January 25, 2022

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

Re: Beluga River - 2021 Interim Groundwater Monitoring Report – Multiple Sites
ADEC Report Approval and Report Comments

Dear Ms. Nixon

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has reviewed the Beluga River 2021 Interim Groundwater Monitoring Report associated with five open sites in the Beluga River Field, located on the west side of Cook Inlet, near Tyonek, Alaska. The report was received in our office on November 3, 2021. The report is approved. ADEC has the following comments.

Site 221-23: The report recommends closing the site and opening a new project to address subsurface soil and groundwater contamination. ADEC will not close the project site but will update the project scope so that the history of the site can be managed as a continuation of the project in our file system. Please prepare a work plan to conduct a Phase I and Phase II assessment of the site to determine the horizontal and vertical extent of soil and groundwater and surface water contamination, both on and off pad.

Site 224-13: The report recommends sampling this well an additional time and moving the site towards closure. Please provide an assessment of the site, including groundwater flow characteristics. Include a narrative site history. The assessment should be written with enough detail to support a closure decision. Is the remaining well in a location that is representative of historical groundwater impacts? What are the current operation conditions at the pad? Evaluate the site and determine if additional assessment and drilling is necessary to close the site with confidence.

Beluga River Abandoned Diesel Tank Farm: The report recommends sampling wells an additional time and moving the site towards closure. Please provide an assessment of the site, including groundwater flow characteristics. Include a narrative site history. The assessment should be written with enough detail to support a closure decision. Are the remaining wells in a location that is representative of historical groundwater impacts? What are the current operation conditions

at the pad? Evaluate the site and determine if additional investigation is necessary to close the site with confidence. It may be important to explore deeper into the aquifer to determine the vertical extent of contamination at this site.

Beluga River Pump Area Assessment: The report recommends sampling wells an additional time and moving the site towards closure. Please provide an assessment of the site, including groundwater flow characteristics. Include a narrative site history. The assessment should be written with enough detail to make a closure decision. Are the remaining wells in a location that is representative of historical groundwater impacts? What are the current operation conditions at the pad? Evaluate the site and determine if additional assessment is necessary to close the site with confidence.

Beluga River Tank Farm: ADEC agrees with the recommendations presented in the report but request that the source area be evaluated to assure that the site is appropriately assessed. The 2018 installation of a water line adjacent to this site encountered significant contamination. This area should be assessed for source and extent of impacts. Please develop a work plan to accomplish these tasks.

Sincerely,

Peter Campbell

Peter Campbell
ADEC Project manager

Cc: Melissa Meyer, Susitna Environmental