



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. 2320.38.029

October 21, 2024

Marshall Farris  
Hilcorp Alaska, LLC.  
3800 Centerpoint Drive, Suite 1400  
Anchorage AK 99503

Re: Kenai Gas Field Pad 14-6 2024 Groundwater Monitoring Report  
ADEC Comments

Mr. Farris:

On May 24, 2024, the Department of Environmental Conservation, (DEC) Contaminated Sites Program, received the 2023 Groundwater Monitoring Report for the Kenai Gas Field. This document was prepared by Aleut. The report is approved with the following comments on the Pad 14-6 section. Comments on the other Kenai Gas Field pads will be addressed in separate letters.

Between the last two sampling events, surface water sample locations SW-2, SW-3, SW-6, SW-7 and SW-8 have had exceedances of TAH and/or TAqH. The primary contaminant driving the exceedance is toluene, which is not a typical contaminant associated with natural gas condensates. We are requesting that Hilcorp determine if the impacts are petrogenic.

DEC is concerned with levels of hydrocarbon in downgradient monitoring well MW-7 (DRO, Benzene, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Naphthalene). Hydrocarbon have migrated off pad in the past, and pad dynamics have not changed to prevent this from happening again. MW-7 is situated downgradient from identified source areas. It should be noted that previous off pad contaminant migration occurred in isolated wetting surface pathways that would be difficult to catch in a monitoring well. We are requesting that Hilcorp visually monitor the wetlands for impacts.

We are requesting Hilcorp install monitoring wells at the former locations of MW-1, MW-15 and MW-21. These wells will monitor the presence of known free product on the pad and represent site conditions and risks.

1,4 Dioxane is now a contaminant of concern. Expand sampling on the pad to determine extent of impacts.

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](mailto:peter.campbell@alaska.gov)

Sincerely,

*Peter Campbell*

Peter Campbell

Environmental Program Specialist