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 21, 2026

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

Re: 2025 Groundwater Monitoring Program Report
ADEC Approval

Mr. Farris:

On March 18, 2026, the Department of Environmental Conservation, (DEC) Contaminated Sites Program, received the 2025 Groundwater Monitoring Program Report. This document was prepared by Aleut Remediation LLC. The report is approved with the following comments.

Report page 2-2: KGF14-6 "In 2010, the relationship between groundwater and surface water hydrology in the wetland southwest of the pad was evaluated. Despite shallow groundwater at the site, the evaluation found that LNAPL was not migrating to the groundwater in the wetland. "This conclusion is misleading in that LNAPL has migrated to the groundwater in the wetland in the past, significant LNAPL remains on pad and site hydrology has not changed.

KGF 14-6: "In 2021 A trend analysis was conducted with groundwater analytical results and showed increasing concentration trends for various analytes in MW-9, MW-17, MW- 22." DEC recommends doing a trend analysis on monitoring wells MW-7, MW-8, MW-9, MW-17 MW-24, MW-26 and MW-36 well concentrations, as this general area is when hydrocarbons have daylighted in the past. We recommend including data beginning from when the wells were installed. Correlate the data with groundwater elevation information, high water data in one data set and low water data in another set.

On pad 14-6, "analytical concentration fluctuations have been observed in various wells and with various analytes." Does this pattern of varying concentrations match changes in groundwater levels?

On Pad 14-6, please describe the sheen in surface water near monitoring well MW-41. Is this a biogenic or hydrocarbon sheen? Please provide hydrocarbon lab analysis and a chromatogram of Kenai Gas Field condensate to help us understand why the greatest toluene concentrations in surface water are associated with the wells with greatest groundwater impacts and that toluene is not present in elevated concentrations at the other surface water sample location in the wetlands.

On pad 14-6 the PVC was cut down at monitoring wells MW-17, due to heaving. Please check the total depth of the monitoring well to the well log and determine if the screen remains in position to evaluate the soil water interface and determine if the top of screen has moved into the surface grout seal.

On KGF 41-7, MW-21R2 is showing a mound of groundwater on the pad, with water flowing radially from this well. It is possible that this well is drilled too close to the bottom of the peat, with groundwater presenting seasonal upward potential from the sand aquifer. The original well, MW-21 was drilled to 6.5 feet BGL with a 2" well screen. This well may represent some of the issues monitoring conditions between pad soils and the underlying mineral soils. There are known source areas within the pad. Hilcorp is required to install a monitoring network capable of determining groundwater conditions in pad soils and separately underlying mineral soils, isolated from the pad with properly installed wells screened below the peat.

Page 5-16 in a discussion on groundwater flow: "If the silt is naturally discontinuous in an area, no action is needed; however, if the silt is present and the monitoring well crosses the silt, it may be recommended to decommission and re-install the well to the appropriate depth." Peat, and especially compressed peat that is present on the pad, may act as a hydrostatic barrier or aquitard. The presence or absence of silt may not be the only factor in determining site hydrology and the understanding of the potentiometric surface.

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

cc: Tasha Bacher – Aleut Environmental