

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

September 1, 1978

NORTHERN REGIONAL OFFICE

JAY S. HAMMOND, GOVERNOR

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DISTRICT OFFICE
FAIRBANKS, ALASKA

SEP 7 AM 10:00

RECEIVED
BUREAU OF ENVIRONMENTAL MANAGEMENT

P.O. BOX 1601 - FAIRBANKS 99707

Mr. John Santora
BLM
P. O. Box 1150
Fairbanks, Alaska 99707

Re: Review of Draft Annual
Plan 78-79

Dear Mr. Santora:

I have reviewed the Draft Annual Plan of Operations for NPR-A 1978-79. My comments on the text are, for the most part, based on operating practices rather than site specific comments. Site specific comments will be addressed by our staff members in their Environmental Assessment preparation. There are some general comments enclosed, based on surface protection concerns, for several of the well site locations.

GENERAL COMMENTS ON PLAN REVIEW

- 1) Comments solicited from other agencies have not been adequately addressed in the draft EIS or past annual plan of operations. The questions and concerns of agencies are merely reputed and appended to the document. When the BLM monitoring reports are reviewed it is readily apparent that there are many unilateral changes made in the Annual Plan by the USGS. A couple of points would be relocation of Tunalik and Inigok airstrips, or the stacking at Husky Point or unauthorized use of the Wolf Creek Camp by the barrel clean-up crew.

Treatment and handling of solid waste, sewage, and oil spills have not followed the procedures set out in the EIS. Questions concerning treatment and handling of these items have been ignored. At this time, under the present circumstances, it is a waste of energy for the various agencies to review this document as whatever they said will be systematically disregarded. However, for the record, I offer the below listed observations and comments on the project.

- 2) There seems to be a general philosophy by some of the DOI that their role in this project is only one of surface protection. They feel that environmentalists should not address engineering

issues of economic values. However, "how does one separate the fingers from the hand?" President Carter has directed the regulatory agencies to consider cost. Point in case again would be Tunalik. BLM was opposed to the project as USGS designed it. Now, after millions of dollars have been spent, the "all weather airstrip" that was so deparately needed is not being used.

We are not trying to tell the USGS how to conduct their geophysical operations, or run their civil engineering program. However, it is possible for non-engineers to point out engineering problems that have environmental consequences. Instead of accepting constructive criticisms, USGS has chosen to disregard the issues and, in many cases, attack the individual by saying "we don't want archeologists making engineering decisions". To sum our example up, one might say that you don't have to be an engineer to see that they probably don't need the multi-million dollar airstrip at Tunalik.

GENERAL COMMENTS ON ENVIRONMENTAL OPERATING PROCEDURES

SOLID WASTE

The State of Alaska Department of Environmental Conservation has the statutory authority and responsibility for solid waste management. 18 AAC 60.130(15) defines solid waste as all unwanted or disregarded solid or semi-solid material whether putrescible or nonputrescible originating from any plastic, rubber, cloth, ashes, litter and street sweepings, dewatered sewage, sludge, dead animals, offal, junked vehicles and equipment material and debris resulting from construction or demolition projects abandoned and decaying structures, hazardous wastes, mine wastes, gravel pit and quarry spoils and overburden except that originating from the construction of single buildings.

There has been a misconception on the part of USGS, Husky and ASAG as to what incineration means; 18 AAC 60.130(4) defines incineration, (5) defines incinerator and (6) defines landfill.

- (4) "incineration" means the process of burning solid, liquid or gaseous combustible wastes to gases and residue, within an incinerator.
- (5) "incinerator" means any equipment, device or contrivance excluding fireplaces and burn barrels, used for the controlled thermal reduction of solid waste.
- (6) "landfill" means a land area used for the disposal of solid waste.

During the 1977-78 field season, contractors were under the impression that "open burn" was synonymous with incineration. This was the general practice for disposal of putrescible garbage and oily waste.

The only incinerator which was routinely used was at Camp Lonely. It was inoperative much of the time, and if it were operational could not have handled the large quantities of garbage and refuse that were brought to Lonely. The incinerator has a capacity of about 175 pounds per hour.

Solid waste from all drill camps was flown back to Lonely for disposal. Husky was continuously directed to maintain the dump as a sanitary landfill and according to their solid waste disposal permit NR 32-77. On numerous occasions, Husky allowed oily wastes, batteries, putrescible garbage, 55 gallon drums and other unauthorized material to be placed in the landfill. On several occasions, fox were observed feeding on "cooked" garbage in the dump. This is in violation of 5 AAC 81.218 which prohibits leaving garbage in a manner that attracts wild animals.

Camp Lonely has a limited area that can be used as a landfill. From both the space conservation and the economics of gravel cover, all debris should be compacted to the maximum.

Both Husky representatives, as well as USGS personnel, have been advised by ADEC to apply for solid waste disposal permits at the drill sites.

The problem of the expensive handling of garbage on and off aircraft, and the environmental concerns would be resolved if there were incinerators at the construction and drill site camps. Ash and inert material could be buried in the camp pads.

Overburden/Rehabilitation

Solid waste also includes overburden and mining wastes. The USGS was directed to supply the ADEC with their mining plans at the 1977-78 construction sites. The USGS has not done this, nor have they submitted the BIM NPR-A project with their plans for reseeding or rehabilitation work at the well sites. Yet, during the summer of 1978, clean-up and restoration attempts at Atigaru and South Simpson were inadequate.

Cats deployed and left at these sites were unable to work because of soft material. Reserve pits were pumped onto the tundra without the approval from the regulatory agency. The BIM should have an active role in this restoration work. Various techniques used in the Canadian arctic, such as stripping and stockpiling tundra, and, prior to site abandonment, pushing the pit walls into massive mounds and then spreading tundra over this may be a good

unilaterally deciding how to rehabilitate a pad, the BLM and ADEC should be involved. The ADEC again is requesting a mining and restoration plan for all material sites and well sites that will have overburden or spoils.

ENVIRONMENTAL ASSESSMENT REPORT

The EA's need to be completed prior to start-up of field activities so that site-specific stipulations can be addressed. In these reports specific restoration/rehabilitation recommendations should be addressed. Last season several of the well sites were nearly complete before their EA's were finished and, as of August 1978, the EA's for Tunalik and Inigok are not complete.

SEWAGE TREATMENT

The EI's state that sewage effluent will be treated to conform with the State and Federal standards. All greywater discharges of the construction and geophysical camps sampled by the ADEC grossly violated State standards.

Fecal coliforms were greater than 60,000 colonies/100 ml. Both BOD and suspended solids were way beyond standards. The USGS was advised of these results and this situation should be corrected prior to the start-up of field activities.

Drill rigs are using physical-chemical sewage treatment plants. At Inigok (which has a known lake trout fishery), the sewage treatment plant is within 300 feet of the lake; and as of July, effluent did not meet State standards. Effluent is not contained and will eventually get into the lake. Exxon and Texaco have used treated effluent or greywater in their mud programs on the North Slope. The USGS may find this both economical, as well as environmentally acceptable.

WATER USE

In general, several of the sites in the proposed Draft Plan may not have sufficient water available. These include the J. W. Dalton site and, perhaps, Tapaluk. The quality of water from these lakes may be questionable for drinking water.

There also may be little water available for drilling purposes unless a snow/ice melter is utilized on Tapaluk.

Last year at Lonely when the snow melter was used, there were numerous complaints about the poor quality drinking water. Regardless of where drinking water comes from, it needs to meet State standards.

GRAVEL USE

The BLM should not allow permanent "fill" another "landfill" sites"

- 1) The gravel is in limited demand.
- 2) The location of an "all weather" airstrip may not be the ideal location for such a facility in the event a discovery is made and the field developed.
- 3) The impacts of opening the country up have not been addressed.
- 4) Cost benefits of using ice and two-seasons wells will allow most wells to be drilled without the expenditure of gravel or environment impacts of gravel mining operations.
- 5) In certain cases, gravel bars and ridges could be leveled.
- 6) This past years' experience points out that even if "all weather" airstrips are built, they may be unused.
- 7) The Corps of Engineers has the authority under Section 404 of the Federal Water Pollution Control Act of 1972, to require a permit for all gravel, dredge and fill operations. This applies to navigable waters as well as wetlands.

FUEL HANDLING PRACTICES

There have been fuel/oil spills on almost every lake used to off-load fuel. There should be no fuel stored on lake ice or transferred on lake ice unless the transfer is done over an impermeable liner. Clean-up of any fluids should be immediate.

Minor fuel spills were not cleaned up this past season until the BIM and ADEC found and reported several of these spills (even though both Husky and USGS were aware of the spills). At two of these sites minor spills were allowed to accumulate to hundreds of gallons of spilled fuels, and at Liberator Lake several migratory birds were killed by the spilled fuel. The BIM has suggested several fuel handling stipulations which are as follows:

- 1) Dry disconnects are required for all bulk transfer fuel hoses.
- 2) Fuel nozzles will not be left unattended during fueling operations.
- 3) The fuel nozzle trigger will not be wedged, or tied, in an open position.
- 4) The amount of fuel being transferred into a tanker or tank will be metered, or visually inspected, during the fueling operation to prevent overfilling.
- 5) Top off tanks at a reduced volume consistent with temperature to prevent overflow. A stick gauge with float is suggested.
- 6) Have approved pressure relief system on each tank.
- 7) Kinks or short loops in fueling hoses will be avoided.
- 8) Fueling operations will be stopped immediately upon discovering leaks or spillage from the servicing equipment.
- 9) If a fuel spill occurs, initiate clean-up immediately.
- 10) The USGS operator will establish a special oil spill clean-up team to oversee the clean-up of fuel spills, rather than place such responsibility on the busy, untrained and often uninterested construction or seismic personnel.

In three instances at Inigok, Liberator Lake and Kiligwa, there were no subcontractors knowledgeable in clean-up procedures on site. This clean-up crew would also be responsible for reviewing on-site SPCC plans and equipment. At Lonely, for example, the dikes around the 30,000 barrel tanks would only contain 75-80% of the tank volume.

- 11) All fueling personnel shall be advised of the names of the personnel on the oil spill clean-up team, and how to contact them. This contact will be made immediately when fuel is spilled.
- 12) Tandem fueling is prohibited (Example - transferring fuel from one tank vehicle to a second tank vehicle which, in turn, is connected to and is pumping fuel into an aircraft).
- 13) Pumps, either hand or power operated, shall be used when aircraft are fueled from drums. Pouring or gravity flow shall not be permitted.
- 14) No petroleum products are to be open-burned after clean-up without the approval of BLM and Alaska Department of Environmental Conservation.

On numerous occasions the USGS contractor conducted open-hydrocarbon burns without approval of the ADEC. The USGS has been officially notified of incidents at Peard Bay and Lonely.

SURFACE OILING/DUST CONTROL

In general, we are opposed to surface oiling of airstrips, roads, and pads at exploratory camps for dust control. Experience indicates that a large percentage of the oil ends up in the water, or in other non-target areas.

SEISMIC ONE-QUARTER MILE RESTRICTION FROM ANADROMOUS FISH STREAMS

The natives continue to talk about seismic fish kills, the ADF&G complains about the effect of energy waves on White Fish eggs. I realize that the ADF&G have not taken advantage of the USGS offer to conduct seismic fishery impact studies; however, if ADF&G won't do the research, then BLM Resources should, or perhaps the USGS or USF&WS.

TRAPPING, HUNTING AND FISHING

The BLM monitors have observed fishing and trapping in and around the camps. The project manager has the authority to make stipulations prohibiting this. If the BLM doesn't want these activities continuing then they should "post" these areas.

MONITORING

I briefly mention this subject to point out that:

- 2) BLM had monitors in the field 7 days per week. However, according to the BLM USGS MOU, BLM is only observing, not enforcing, environmental stipulations. They are to report violations to USGS. Hopefully, both BLM and USGS will revamp their approach to the monitoring program this upcoming season. Regardless of who does the job, someone has to enforce the stipulations.

GENERAL COMMENTS ON SPECIFIC SITES

TAPKALUK

This island is occasionally inundated with ice. Should the USGS drill this well, how will the rig be protected against the ice? How will drilling muds be disposed of? What precautions will be taken to protect fuel tanks? This location will also require a Corps of Engineers Section 10 permit. Where is the center of the structure, and could this well be relocated?

LISBURNE

If possible, no all-weather Hercules airstrip should be built.

- 1) Past experience illustrates that scheduling problems may be delayed and the runway not needed.
- 2) Gravel is limited in this area and gravel may be better utilized, should oil be produced in this area.
- 3) There may be an adverse effect on falcon/hawks in this area from increased air traffic.
- 4) Should the airstrip be built, it may necessitate a lengthy archeological clearance.
- 5) Should the decision be made to build an all-weather strip, we would prefer that the river bench be used rather than the upland site.
- 6) Of the material sites reviewed on August 29, 1978, we prefer the use of the upland site currently being excavated by the archeological team. In this case, taking all of the material from one location vs mining numerous small gravel bars, would have less effect on habitat.
- 7) This agency is in favor of using ice pads, airstrip and roads when possible. We feel that the use of semi-permanent gravel or sand pads should be minimized.

SOUTH BARROW GAS WELLS

In general, a revegetation program is needed for these sites, as well as those drilled in the past.

PAGE SPECIFIC COMMENTS

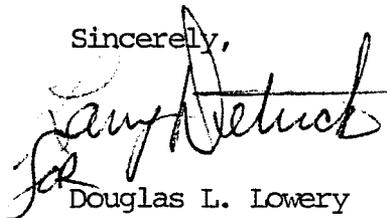
Page 32 - In reference to the burning of any hydrocarbons - prior to the open-burning of oil/fuel/grease - authorization is

- Page 50 - Will styrofoam or any insulation be used in runway construction?
- Page 69-70 - Travel across the tundra or along the coast to obtain water should be discussed.
- Page 89-90 - Where will the borrow sources for South Barrow gas wells be located?
- Page 103 - The Alaska Department of Environmental Conservation is not aware of any joint planning effort being conducted with ONPRA in regards to the on-going clean-up of NPR-A. They have made several attempts to obtain site-specific information, but have not received the USGS plans. However, they would be pleased to work with the USGS should ONPRA so desire.

Stipulation #17(A-7) All waste water discharges, with the exception of grey water, require a permit and/or plan review from ADEC.

We are pleased to have the opportunity to comment on this document. These comments are meant to be constructive and to point out areas where there is a definite need for improvement.

Sincerely,



Douglas L. Lowery
Reg. Env. Supv.

JB:g