



"The mission of the Council is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and oil facility operations in Cook Inlet."

June 4, 2009

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Mr. Ira Rosen
Alaska Department of Environmental Conservation
Project Manager, Alaska Oil and Gas Infrastructure Risk Assessment
ARA Comments
PO Box 175
Seldovia, AK 99663

SUBJECT: Cook Inlet RCAC Comments on the "Proposed Risk Assessment Methodology" of the Comprehensive Evaluation and Risk Assessment of Alaska's Oil and Gas Infrastructure

Dear Mr. Rosen:

Cook Inlet Regional Citizens Advisory Council (Cook Inlet RCAC) has reviewed the above-referenced document and has concern regarding the reliability screening threshold level set for inclusion in the risk assessment process.

The Cook Inlet Oil and Gas infrastructure includes production and exploration offshore platforms, their associated subsea pipelines, and above ground transmission lines to and from refinery operations. However, due to the level set out in the current methodology, Cook Inlet would not be considered under the risk category of "Reliability". Since the crude oil production loss of Cook Inlet is considerably less than the 4,200,000 bbls cited, it would be screened out.

In regards to the category of "Environmental" risk, Cook Inlet might have trouble meeting some of the criteria to remain included in the risk assessment process. Since production and transport rates in Cook Inlet are considerably smaller than those found at the North Slope facilities and through the Trans Alaska Pipeline System (TAPS) corridor, some nodes in this category may be screened out as well.

The majority of the oil and gas infrastructure of Cook Inlet has been in place since the mid 1960's. A significant portion of the Cook Inlet piping infrastructure is subsea and cannot be visibly inspected. A breach in any one of these could be devastating to the Cook Inlet environment in many ways. A significant discharge could produce a devastating economic blow to the State's economy caused by the interruption of the bulk of Alaska's marine transportation operations, a shut down to the vibrant sport and commercial fisheries and a possible shut down of refinery operations. Unlike a pipeline spill on the North Slope, an equivalent discharge from a Cook Inlet subsea pipeline has the potential to spread rapidly and negatively affect a very large area of extremely sensitive ecosystems. The effects of such a discharge would reflect in the local economy initially then ultimately in the state's economy. The economic consequences are far reaching, from influencing market perception of Alaska wild caught salmon to increasing the volatility of the national energy market.

In regards to the "Safety" category, some of the facilities located within the Cook Inlet area may not meet the level of impact required to pass the screening process. While we realize this situation exists for each node to be evaluated, it is only mentioned to show that it is yet another way the Cook Inlet infrastructure could be screened out to the point where only a few nodes would make the cut. This circumstance would be a gross misrepresentation of the actual risks presented by the Cook Inlet infrastructure and the actual risks to the Cook Inlet infrastructure itself.

While gas production and transportation is not in Cook Inlet RCAC's mandate, we feel it is important enough to the region to mention. Because much of the gas infrastructure is intertwined with the crude oil infrastructure, we feel the same concerns are valid.

In conclusion, our concern is that through the screening process the Cook Inlet infrastructure overall may not compare significantly enough to remain in the Alaska Risk Assessment (ARA). It is our recommendation that the Cook Inlet Oil and Gas infrastructure thresholds be reduced or eliminated to reflect the overall relationships and effects within the region. Alternately, a detailed analysis for the Cook Inlet Oil and Gas infrastructure, as a whole, would be considered. It is our desire to insure Cook Inlet will remain in the ARA process to insure this vital part of our State's environment, economy, and safety of the population is not overlooked.

If you have any questions regarding our comments, please contact Vinnie Catalano or myself at (907) 283-7222.

Sincerely,



Michael L. Munger
Executive Director