May 9, 2017

Larry Hartig, Commissioner
Alaska Department Environmental Conservation
P.O. Box 111800
Juneau, AK 99811-1800

Andy Mack, Commissioner
Alaska Department of Natural Resources
550 W 7th Avenue, Suite 1400
Anchorage, AK 99501-3561

Dear Commissioners Hartig & Mack:

Last week, Hilcorp formally announced plans to discontinue use of the Drift River Oil Terminal (DROT) and instead to transport oil across Cook Inlet via pipeline.

Because we have long-condemned oil storage at the base of Mt. Redoubt, along with the heightened risk of tankering oil across the Inlet, we are cautiously optimistic about Hilcorp’s plans.

Although we do not know all the details around Hilcorp’s plans, we understand Hilcorp wants to convert the gas line running between Granite Point and the East Forelands into an oil line. While this line is not as old as many in Cook Inlet, it was apparently installed in the 1980’s, and as a result, has been subject to Cook Inlet’s unforgiving forces for several decades.

I am writing now for two reasons. First, I want to urge you to ensure Hilcorp’s new plan does not simply transfer one set of risks to another. Specifically, we believe the converted pipeline must be structurally sound to transport oil, and must include state-of-the-art leak prevention and detection technologies.

Second, I urge you to require complete dismantlement, removal and remediation (DR&R) of all infrastructure associated with the DROT. Adequate DR&R is simply a cost of doing business in Cook Inlet, and the concept of “dismantlement in place” should not be an option.
Thank you for your attention to these matters and please feel free to contact me if you have questions at 907.299.3277 or bob@inletkeeper.org

Yours for Cook Inlet,

[Signature]

Bob Shavelson
Inletkeeper

Cc: Sam Cotton, ADFG
    Kristin Ryan, ADEC
    Mike Munger, CIRCAC