

Cook Inlet RCAC weighs in on proposed permits for exploration, development, production

The State of Alaska and U.S. Environmental Protection Agency (EPA) recently submitted a Cook Inlet wastewater discharge permit for public comment, with the goal of reissuing the exploration component of the 2007 Permit as two general permits—one in Federal Waters (AKG-28-5100) and one in State Waters (AKG-31-5100) of Cook Inlet.

During the last permit cycle, one general permit for both production and exploration covered most of Cook Inlet's oil and gas platforms and produced water facilities and was administered by EPA under their National Pollutant Discharge Elimination System (NPDES). Since then, the State of Alaska Department of Environmental Conservation (ADEC) has been assuming primacy of wastewater discharge permits in Alaska waters, starting with the seafood industry, and working through others such as municipal discharges and mining. In November 2012, EPA transferred administration of future oil and gas permits in state waters to ADEC under the Alaska Pollutant Discharge Elimination System (APDES).

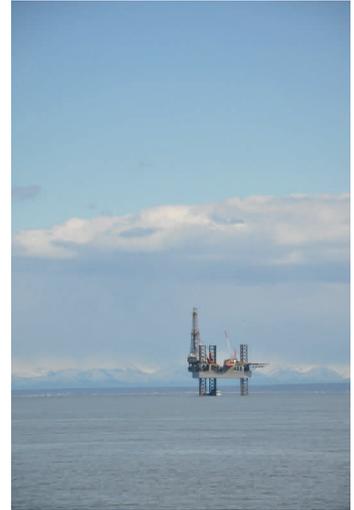
For this permit cycle, instead of a general permit for exploration *and* production, both EPA and ADEC released draft permits for only mobile exploration facilities in federal and state waters, respectively. Cook Inlet RCAC submitted comments on the proposed permits to both EPA and ADEC. The two permits are very similar with respect to wording and effluent discharge limits, with a few exceptions, such as the State permit requiring that permittees request mixing zones for those discharges that exceed State of Alaska criteria.

The State permit also allows the discharge of test fluids, which is not included in the federal permit.

We submitted comments ranging from recommendations about specific analytical testing procedures, to supporting those permit changes that require dischargers to submit more information than is required by the current permit. For example, the proposed permits would require Drilling Fluids Plan and Chemical Additives Inventories.

In addition to commenting on changes between the existing 2007 Permit and the two Draft Permits, we focused on our concerns with the proposed environmental monitoring requirements for drilling muds/cuttings discharges and the discrepancy between permit requirements and the monitoring work currently being conducted in Cook Inlet for exploration activities.

With increased exploration activities in the Inlet, we also restated our position supporting a goal of zero discharge and requested that EPA revisit Effluent Guidelines for the coastal waters of Cook Inlet to reevaluate existing exemptions for working towards zero discharge in light of more current information.



Spartan 151 Jack Up Rig
(Photo: Susan Saupe 2012)