



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 155
Seattle, WA 98101

ENFORCEMENT &
COMPLIANCE ASSURANCE
DIVISION

Reply To: 20-C04

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

Ms. Sherry Billings
Registered Agent
ConocoPhillips Alaska, Inc.
700 G Street
Anchorage, Alaska 99501

Re: INFORMATION REQUEST Regarding ConocoPhillips Alaska, Inc., Anchorage, Alaska

Dear Ms. Billings:

The U.S. Environmental Protection Agency (EPA), Region 10, seeks information concerning the facility owned or operated by ConocoPhillips Alaska, Inc. (CPAI or "Facility") at the Colville River Unit, Alpine Field, CD1 drill site, at approximate coordinates 70.34263N, 150.92861W in Alaska. The enclosed Information Request is issued to CPAI pursuant to Section 114 of the Clean Air Act (CAA), 42 U.S.C. § 7414, and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9604(e).

Under CAA Section 114, 42 U.S.C. § 7414, EPA is authorized to require the submission of records, reports and other information for the purpose of determining whether any violations of the CAA have occurred and for other purposes of the CAA. In addition, under CERCLA Section 104(e), 42 U.S.C. § 9604(e), EPA is authorized to require the submission of information or documents related to, *inter alia*, the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant from a facility. CPAI is required to provide information and documents in accordance with the enclosed Information Request within **60 days** of your receipt of the request. If you anticipate being unable to fully respond to this Information Request by the specified date, you may request an extension within **14 days** of receipt of this request. Include a justification for your extension request. If timely submitted, EPA will consider your request and may extend the deadline.

Submit your response to this Information Request or request for extension to:

Javier Morales
morales.javier@epa.gov
(206) 553-1255

Please ensure the enclosed Statement of Certification is signed by a duly-authorized officer or agent of CPAI and returned with the response to this Information Request.

Failure to timely respond fully and truthfully to this Information Request may subject you to civil penalties pursuant to Section 113 of the CAA, 42 U.S.C. § 7413, and Section 104(e)(5) of CERCLA, 42 § 9604(e)(5). In addition, providing false, fictitious or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. Your response to this Information Request may be used by EPA in administrative, civil or criminal proceedings.

Thank you for your cooperation. If you have any questions regarding this Information Request or wish to request an extension, please contact Javier Morales, at (206) 553-1255 or morales.javier@epa.gov. For legal matters or questions from legal counsel, please contact Brandon Cobb, in the Office of Regional Counsel, at (206) 553-6917 or cobb.brandon@epa.gov.

Sincerely,

**EDWARD
KOWALSKI**

Digitally signed by
EDWARD KOWALSKI
Date: 2023.02.16
08:58:43 -08'00'

Edward J. Kowalski
Director

Enclosures

1. Information Request
2. Statement of Certification

**ENCLOSURE 1
INFORMATION REQUEST**

ConocoPhillips Alaska, Inc.

A. INSTRUCTIONS

1. Provide a separate narrative response to each question and subpart of a question in this Information Request. Mark each answer with the number of the question (and subpart, if applicable) to which it corresponds.
2. For each question, provide a copy of each document reviewed or referred to in the preparation of the response or that contains information responsive to the question.
3. Indicate on each document produced in response to this Information Request, or in another reasonable manner, the number of the question to which it corresponds.
4. If requested information or documents are not known or are not available to you at the time of your response to this Information Request, but later become known or available to you, you must supplement your response to EPA. Moreover, if you find at any time after submission of your response that any portion is or becomes false, incomplete, or misrepresents the facts, you must provide EPA with a corrected response as soon as possible.
5. Provide the name, title, and business contact information for each person who prepared or was consulted in the preparation of your response. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained in this Information Request, or who may be able to provide additional responsive documents, provide the name, title, and business contact information for each such person and the additional information or documents that they may have.
6. If you believe a question is not applicable to the Facility, explain in detail the reason for that belief.
7. The information requested must be provided whether or not you regard part or all of it as a trade secret or confidential business information. You may assert a confidentiality claim covering part or all of the information submitted, pursuant to Section 114 of the Clean Air Act (CAA), 42 U.S.C. § 7414 and 40 C.F.R. Part 2, by placing on (or attaching to) the information, at the time it is submitted to EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as “trade secret,” “proprietary,” “company confidential.” Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by EPA.

Information covered by such a claim will be disclosed by EPA only to the extent and by the procedures set forth in statutes and 40 C.F.R. Part 2, Subpart B. See 40 C.F.R. § 2.301 for additional rules governing certain information obtained under the CAA. Note that certain categories of information, including “emission data,” are not entitled to confidential treatment. Unless you make a claim at the time you submit the information in the manner described in 40 C.F.R. § 2.203(b), it may be made available to the public by EPA without further notice to you. See also 41 Fed. Reg. 36902 (Sept. 1, 1976).

B. DEFINITIONS

All terms used in this Information Request have their ordinary meaning unless such terms are defined in this Information Request; the CAA, 42 U.S.C. 7401, *et seq.*; 40 C.F.R. Parts 68, 300, 355, and 370; or the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). For purposes of this Information Request:

1. The terms “ConocoPhillips Alaska, Inc.” or “CPAI” mean ConocoPhillips Alaska, Inc. and its subsidiaries, officers, directors, managers, partners, employees, contractors, trustees, successors, assigns, and agents, as applicable.
2. “Document” includes writings, records, or information of any kind, formal or informal, whether handwritten, typed, or otherwise recorded in or on any format or media. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. Include all attachments to or enclosures with any responsive document.
3. The terms “site” and “facility” refer to the CD1 drill site, Colville River Unit, Alpine Field, at approximate coordinates 70.34263N, 150.92861W.
4. The term “accidental release” means an unanticipated emission of a regulated substance or other extremely hazardous substance into the ambient air from a stationary source.
5. The term “Injury” means any effect on a human that results either from direct exposure to toxic concentrations; radiant heat; or overpressures from accidental releases or from the direct consequences of a vapor cloud explosion (such as flying glass, debris, and other projectiles) from an accidental release and that requires medical treatment or hospitalization.
6. The terms “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this information request any information which might otherwise be construed to be outside its scope.
7. Words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a question or questions.

C. INFORMATION REQUEST

ConocoPhillips Alaska, Inc. (CPAI) must submit the following information pursuant to CAA Section 114(a), 42 U.S.C. § 7414(a), and CERCLA Section 104(e), 42 U.S.C. § 9604(e):

1. Provide all documents related to CPAI’s design, construction, maintenance, and monitoring of its Colville River Unit, Alpine Field, CD1 drill site, at approximate coordinates 70.34263N, 150.92861W (the “site”). This request includes contractor activities related to the 2022 Incident. CPAI’s response to this request must include:
 - a. Any permit applications or approvals for the drill site;
 - b. Documents describing the design of the well and or the drilling and construction plan for the site;
 - c. Cementing records and crew reports for every phase of construction;

- d. Well integrity assessments;
 - e. Pressure monitoring procedures and reports; and
 - f. Any risk assessments regarding the site or its construction.
2. Provide all documents related to the well blowout incident that was initially reported on March 4, 2022 and continued uncontrolled until at least May 2, 2022 (the “2022 Incident”) at the site. This request includes contractor activities related to the 2022 Incident. CPAI’s response to this request must include:
- a. Provide the name and address of the legal owner of the site. If the owner and operator of the site are not the same entity, provide the name and address of the operator of the site;
 - b. Describe the immediate causes, proximate causes, and/or contributing factors for the 2022 Incident;
 - c. Any documents describing or related to the immediate causes, proximate causes, and/or contributing factors for the 2022 Incident;
 - d. Calculations of total emissions of substances listed pursuant to Section 112(r)(3) of the CAA, 42 U.S.C. § 7412(r)(3), that were released as a result of the 2022 Incident, including preliminary estimates and any updated calculations;
 - e. Calculations and/or estimates of any additional total natural gas, methane, and VOC emissions released at the site after the damaged well was cemented off;
 - f. Air quality monitoring measurements taken before, during, and after the 2022 Incident;
 - g. Reports or other descriptions of CPAI’s efforts to contain the 2022 Incident, including but not limited to all reports submitted to the State of Alaska;
 - h. A description of any injury, employee exposure, and damage resulting from the 2022 Incident, and any reports on injury, employee exposure, or damage related to the 2022 Incident;
 - i. Documents related to the evacuation of the surrounding area following the 2022 Incident and during containment efforts;
 - j. Reports, documentation, or analyses of risks posed to the public or surrounding environment by the 2022 Incident, including the risk of exposure to hazardous materials or fires;
 - k. Hazard assessments or worst-case accidental release assessments developed for the site prior to the 2022 Incident;
 - l. Risk prevention standards, safety protocols, or operating procedures that were in place at the site at the time of the 2022 Incident and related to the evaluation or maintenance of the well’s integrity and the prevention of well blowouts;
 - m. A description of any risk/accident prevention measures applying to or considered for similar CPAI drilling and well completion operations that were drafted, modified, and/or adopted after the 2022 Incident, whether or not finalized or implemented;

- n. Documents related to Question 1.m;
 - o. Emergency response plans in place prior to and after the 2022 Incident;
 - p. Documents related to training of employees at the site, including identification of any training modified or implemented subsequent to the 2022 Incident; and,
 - q. Documentation of any equipment integrity testing conducted prior to, during, or subsequent to the 2022 Incident.
3. Provide all documents describing industry standards for safety protocols recommended for oil and natural gas well drilling, hydraulic fracturing, and completion operations, including any procedures developed to promote and maintain safe and healthy working conditions and prevent accidental releases or blowouts during well completion activities, such as those published by the American Petroleum Institute or similar trade and safety organizations. This production should also include any standard operating procedures or manuals maintained by CPAI or its corporate partners related to well design, construction, maintenance, pressure monitoring, or integrity assessments.
 4. Provide all documents that describe any methane or VOC reduction efforts CPAI has taken or plans to take at any of its facilities in the oil and gas production, processing, storage, or transmission sectors.
 5. Describe all actions taken for the purpose of mitigating emissions from accidents or accidental releases.
 6. Provide all documents related to any general corporate policy developed or implemented by CPAI for the purpose of mitigating emissions from accidents or accidental releases.

ENCLOSURE 2
STATEMENT OF CERTIFICATION

ConocoPhillips Alaska, Inc.
700 G Street
Anchorage, Alaska 99501

INFORMATION REQUEST
STATEMENT OF CERTIFICATION

I certify that the enclosed responses to EPA's Information Request issued to ConocoPhillips Alaska, Inc. are true, accurate, and complete. I certify that the portions of these responses which I did not personally prepare were prepared by persons acting on behalf of ConocoPhillips Alaska, Inc. under my supervision and at my instruction, and that the information provided is true, accurate, and complete. I am aware that there are significant penalties for submitting false information in response to this Information Request, including the possibility of fine and imprisonment.

Signature

Printed Name

Title

Date