



THE STATE  
of **ALASKA**  
GOVERNOR MICHAEL J. DUNLEAVY

## Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE  
Contaminated Site Program

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File: 2334.38.018, 2334.38.019,  
2334.38.020, 2334.38.021,  
2334.38.022, 2334.38.023, 2334.38.024

August 1, 2022

Amy Pelosa  
Hilcorp Alaska, LLC  
3800 Centerpoint Drive Suite 100  
Anchorage AK 99503

Re: Swanson River Field  
2021 Groundwater Monitoring Program Report  
ADEC Report Plan Approval

Dear Ms. Pelosa:

The Kenai Area Office of the Alaska Department of Environmental Conservation, Contaminated Site Program (ADEC) has reviewed the 2021 Groundwater Monitoring Program Report for the Swanson River Field, dated February 2022. We have reviewed this report and the report is approved with the following comments.

Please include the ADEC Project Numbers and Hilcorp staff name and address that the report is prepared for on your cover letter.

In future reports, please present historical product measurements and recovery for each pad. This gives insight into the rate of attenuation of NAPL over time.

It was difficult to determine well abandonment procedures from the data presented in the report. Please provide well logs for the wells abandoned in this report. If available, please provide all available digital well logs for all Swanson River pads. It appears from the information presented that the well was not abandoned properly. The well screen end cap is to be knocked out and the well grouted as the casing is pulled. Alaska Drinking Water Regulations (18 AAC 80.015(e)) require that a person who decommissions a monitoring well shall use a method that conforms to ANSI/AWWA Standard A100-97, adopted by reference in 18 AAC 80.010. See ADEC Monitoring Well Guidance, September 20213.

Rather than waiting until 2023, Hilcorp should consider sampling TS1-4EE and the drainage path/culvert north of TS1-4EE for glycols during the late fall of 2022 (before freeze up) when water levels are typically elevated.

If you have specific questions regarding these report comments, you can reach me at 907-262-3412 or via email at [peter.campbell@alaska.gov](mailto:peter.campbell@alaska.gov).

Sincerely,

*Peter Campbell*

Peter Campbell  
Project Manager  
ADEC Contaminated Sites Program

cc: Kimi Lloyd, Brice Environmental Services  
Lynnda Kahn, USFWS  
Sharon Yarawsky, BLM  
Stephanie Rice, BLM