CWA 401 Water Quality Certification Request

version 2.12

(Submission #: HQ7-3X3S-HBAHV, version 1)

Details

Site: Ivan River Unit Pad Expansion

Submission ID HQ7-3X3S-HBAHV

Form Input

Form Instructions

Form Instructions

Instructions for filling out the 401 Prefiling Meeting Request Form are located on the Alaska DEC website at the link below.
401 Prefiling Meeting Request Form Instructions

Agents: For Delegation of Authority to act on behalf of the applicant in processing the application, use the following form, have signed, and upload with application.

- Delegation of Authority - 401 Application

Contact Information (1 of 1)

Required Contacts

The following **Contact Roles are *REQUIRED***. Please select the appropriate role(s) for each contact and complete the contact details. Multiple role(s) may be assigned to each unique individual.

- **Applicant** (Responsible Party)
- **Billing Contact**

Contact Role(s)
Applicant
Billing Contact

Contact

Prefix
Mr.

First Name	Last Name
Stetson	Sannes

Title
Environmental Specialist

Organization Name
Hilcorp Alaska, LLC

Phone Type	Number	Extension
Business	9075644665	

Email
stetson.sannes@hilcorp.com

Mailing Address

3800 Centerpoint Drive

Suite 1400

Anchorage, Alaska 99524

Project / Facility Site Info

Identify the applicable federal license or permit

A copy of the federal permit or license application is required to be submitted with the request for the water quality certification. (18 AAC 15.130, 18 AAC 15.180)

Federal Agency
Army Corps of Engineers (USACE)

Permit License Number (ex. USACE: POA-XXXX-XXXX; FERC: FERC-xxxx-xxxx; EPA: AK#######)
POA-2024-0515

Project Name or Title
Ivan River Unit Pad Expansion

Primary Receiving Waterbody Name
NONE PROVIDED

Estimated Project Dates (+/- 30 days)

Project Estimated Start Date	Project Estimated End/Completion Date
04/01/2025	08/01/2025

Approximate date(s) when any Discharge(s) may commence (+/- 30 days)

Description	Discharge Estimated Start Date	Discharge Estimated End Date
Placement of fill	04/01/2025	08/01/2025

Project Description (Nature of Activity, include all features)
Hilcorp Alaska, LLC (Hilcorp) is proposing to expand the Ivan River Unit gravel pad to support natural gas development in Cook Inlet. The expanded pad will increase by approximately 2.1 acres with an additional 14,100 cubic yards (CY) of gravel placed.

The expanded pad will involve placement of gravel fill abutting existing infrastructure to support natural gas operations in the Ivan River Unit. 2.1-acres of jurisdictional Palustrine emergent wetlands as defined by the U.S. Army Corps of Engineers (USACE) will be directly impacted/lost as a result of this project. Since the project is located in wetlands located above the high tide line of the Cook Inlet, issuance of a USACE Section 404 Individual Permit (IP) is necessary to perform this project. Construction is anticipated to start during the fall of 2024 and will continue through the summer season of 2025 as needed.

Project Purpose (Describe the reason(s) for discharge)
To support to support natural gas development in Cook Inlet and development of additional gas wells.

Is any portion of the work already complete?
No

Description of current activity site conditions
This is an active gas production pad located on the west side of the Cook Inlet.

Relevant Site Data, Photographs that Represent Current Site Conditions, or other Relevant Documentation
NONE PROVIDED
Comment
NONE PROVIDED

Is this a linear project? (i.e., utility line, road, etc.)
No

Project Address
[NO STREET ADDRESS SPECIFIED]
[NO CITY SPECIFIED], AK *[NO ZIP CODE SPECIFIED]*

Visit the link below to help with conversion between DMS and Latitude/Longitude
DSM - Lat/Long converter

Project Location
61.24030113256872,-150.8000795099905

Visit the following link if you need to convert the lat/long to get the **PLSS information**
Converter for Section, Township, and Range

PLSS Location (Public Land Survey System)

State Tax Parcel ID	Borough/Municipality	Meridian	Section	Township	Range
NONE PROVIDED	Matanuska-Susitna Borough	Seward	1	13	9

Directions to Site
The project site is located approximately 17 miles from the Census Designated Place of Beluga, Alaska by way of road.

Federal Agency Contact (1 of 1)

Have you been working with anyone in the Federal Agency?
Yes

Federal Contact Role
USACE

Federal Agency Contact

First Name Drew **Last Name** Sliger

Title
NONE PROVIDED

Organization Name
USACE

Phone Type	Number	Extension
Business	907-753-2712	

Email
drew.e.sliger@usace.army.mil

Dredge Material to be Discharged

Is dredging involved?
No

Tier Analysis

A tier analysis is comprised of a layered approach to determine the need for testing the dredge material to aid in generating physical, chemical, toxicity and bioaccumulation information, but not more information than is necessary to make factual determinations.
The tier analysis is a series of tiers (I – IV) or levels of intensity (and cost) of investigation. It is necessary to proceed through the tiers only until information is sufficient to make factual determinations, no further testing is required.

- **Tier I - Site Evaluation and History**. The initial tier (Tier I) uses readily available, existing information (including all previous testing). For certain dredge materials with readily apparent potential for environmental impact (or lack thereof), information collected in Tier I may be sufficient for making factual determinations.
- **Tier II - Chemical Testing** is concerned solely with sediment and water chemistry.
- **Tier III - Biological Testing (bioassay and/or bioaccumulation testing)** is concerned with well-defined, nationally accepte toxicity and bioaccumulation testing procedures.
- **Tier IV - Special Studies** allows for case-specific laboratory and field testing, and is intended to for use in unusual circumstances.

For more information regarding a Tier analysis, see below references

- **EPA Inland Testing Manual**
- **USACE Seattle District Civil Works DMMP User Manual**

Fill Material to be Discharged

Will Fill Material be Discharged?
Yes

For fill material, identify the material source
Gravel may be sourced from the reclamation of an old pad no longer in use or other local existing gravel source that is in close proximity to the existing road system and trucked to the proposed work site.

Types of material being discharged and the amount of each type (cubic yards)

Type	Cubic Yards
Gravel	14,100

Surface area in (acres or linear feet) of wetlands or other waters filled

Surface Area	Units
2.1	Acres

Discharge Location Information (1 of 1)

Identify the location and nature of any potential discharge that may result from the proposed project and the location of receiving waters

Discharge Location ID (001, 002, 003, - increment by one)
001

NOTE: if you have a receiving water that is Wetlands, just enter the generic term "Wetlands". Do not enter "Wetlands of Tanana River", for example.

Please select 'Other' if your waterbody is not in the list below.
You can start typing the name of the waterbody to filter the list.

Receiving Waterbody / Wetlands Name
Wetlands

Discharge Location
61.240526826281695,-150.80013861656073

Other Pollutant Sources

Contaminated Site Information

Determine if your project is **within 1,500 feet** of a known Alaska DEC Contaminated Site. See the *Alaska DEC Contaminated Web Map* below. This will help you to identify if any potential pollutants/parameters of concern may be present on your project site., see DEC's website:

- **Contaminated Sites Web Map**
- **Contaminated Sites Database Search website**

Is the project within 1,500 feet of a known contaminated site?
No

Parameters of Concern that may be present in discharge

Parameter(s) of Concern

Identify the parameters of concern that may be present in your discharge from the dredge and/or fill material.

Note, **TURBIDITY** and **SEDIMENT** are routine parameters associated with dredge and/or fill activities.

Consider if other parameters may be present from past activities in the area such as contamianted site data, impaired waters or other relevant water quality data, or other parameters of concern identified during the application process.

Parameter(s)
Turbidity
Sediment

If known, describe respective concentrations, persistence, and potential impacts to the receiving water and data on parameters that may alter the effects of the discharge to the receiving water
There is potential for water quality impacts stemming from the introduction of turbidity and suspended sediments in run-off from Ivan River Pad. However, because maintenance occurs minimally and within previously permitted footprints, local turbidity due to excess total suspended solids (TSS) would not be increased.

Impaired Waters

An ***impaired waterbody*** are those listed as a **Category 4 [304(b)] or Category 5 [303(d)]** in the current EPA approved *Alaska's Integrated Water Quality Monitoring and Assessment Report.*

For the most recently *Approved Integrated Water Quality Monitoring And Assessment Report (Integrated Report)*, see DEC's website:

- **Integrated Water Quality Monitoring And Assessment Report** https://dec.alaska.gov/water/water-quality/integrated-report

Does a discharge of any parameter identified above occur to an impaired waterbody?
No

If determined necessary and requested by the Department, submit sufficient and credible baseline water quality information for the receiving water which meets the requirements of 18 AAC 70.016(a)(6)(A-C).

Avoidance & Minimization BMPs and Mitigation Measures

Describe how impacts are being avoided and minimized on the project site. Include best management practices (BMPs) for sediment and erosion controls that will be implemented to minimize environmental impacts, and any methods and means proposed to monitor the discharge and the equipment or measures planned to treat, control, or manage the discharge.

Include a description of any methods and means proposed to monitor the discharge and the equipment or measures planned to treat, control, or manage the discharge
Typically pads are designed so water will drain off-pad to specific locations, or to a berm, allowing for water management and monitoring.

Avoidance Measures
The entire project area contains jurisdictional waters of the United States; therefore, complete avoidance is not practicable. Hilcorp proposes to include the following practicable avoidance measures:
• No fill will be placed below the high tide line of Cook Inlet which would avoid impacts to documented Cook Inlet Beluga Whale Critical Habitat
• Fill will be placed during low water conditions, or above tidal elevations
• Project limits will be delineated with silt fencing or similar material to avoid impacts outside the proposed pad area
• Work will occur from the existing pad surface to avoid additional temporary impacts to Waters of the U.S.

Minimization Measures
Hilcorp will incorporate the following minimization measures into project design and construction to reduce overall impacts on Waters of the United States:
• The pad will be constructed with a minimum 2V:1H side slopes to minimize fill area and impacts to wetlands
• Regular pad surface watering will occur during operation to minimize fugitive dust deposition to the area
• Existing gravel sources will be used

Mitigation Measures
Hilcorp evaluated the unavoidable fill proposed for the Ivan River Pad project using the USACE Alaska District's Mitigation "Thought Process" document, which provides a crosswalk from the implementing regulations provided in 33 CFR Part 320.4(r)(2) to Alaska District internal guidance regarding the need for compensatory mitigation. In the "Thought Process", the Alaska District identifies six instances where compensatory mitigation may be required when:
1. The project occurs in rare, difficult to replace or threatened wetlands, or areas of designated Critical Habitat (i.e., Cook Inlet Beluga whale designated critical habitat).
2. The project impacts more than 1/10th acre of wetlands and/or other waters of the United States or 300-linear feet of stream, AND the watershed condition is such that compensatory mitigation is necessary to offset the project's unavoidable effects. Situations that can indicate degradation of the watershed's aquatic environment can include, but are not limited to, waters listed as impaired, or Clean Water Act Section 203(d) listed waterbodies, identification in a watershed management plan, impervious surface cover, developed land use, etc.
3. Fill is placed in intertidal waters associated with special aquatic sites

4. Fill is placed in fish bearing waters and jurisdictional wetlands within 500-feet of such waters when impacts are determined to be more than minimal
5. The project is federally funded, so compensatory mitigation is required under Executive Order 11990 to meet the National policy of no net loss of wetlands; and
6. Large-scale projects with adverse aquatic resource impacts (e.g., mining development, highway, airport, pipeline, and railroad construction projects [33 CFR 320.4(r)(2)] (i.e., bridge that results in substantial loss of intertidal habitat).

Social / Economic Importance

Social or Economic Importance

(18 AAC 70.016(c)(5): Provide information that demonstrates the accommodation of important social or economic development. The applicant shall complete either a social OR economic importance analysis (or both) for each affected community in the area where the receiving water for the proposed discharge is located.

Social Importance Analysis
Infrastructure improvements

Economic Importance Analysis
Access to recourses
Employment, job availability, and salary impacts

Describe Social and/or Economic Importance of the project
This project will improve infrastructure through the construction of new gas wells for gas recovery in the Ivan River Unit. Increased gas production and exploration has positive impacts on local economies, including employment and salary potential for Alaskans. Natural gas is the primary source of energy for residential, commercial, and industrial use in Southcentral Alaska. It provides heating and electricity, reducing dependence on external energy sources. Natural gas recovery contributes to Alaska's economy through taxes, royalties, and lease payments.

Description of Social or Economic Importance, if needed
NONE PROVIDED
Comment
NONE PROVIDED

List of Other Permits or Certificates

*Would include but is not restricted to zoning, building, and flood plain permits.

Include a list of all other federal, interstate, tribal, state, territorial, or local agency authorizations required for the proposed project, including all approvals or denials already received.

Agency	Type of Approval*	Identification Number	Date Applied	Date Approved	Date Denied
USACE	Individual Permit (IP)	POA-2024-0515	07/10/2024	*NONE PROVIDED*	*NONE PROVIDED*
ADFG	Special Area Permit (SAP)	*NONE PROVIDED*	08/19/2024	*NONE PROVIDED*	*NONE PROVIDED*
AK DNR DOG	LOCI Plan of Operations Amendment (POOA)	*NONE PROVIDED*	08/19/2024	*NONE PROVIDED*	*NONE PROVIDED*

Other Agency or Local Contacts (1 of 1)

Contact Role
OTHER_REG_CNTCT

Other Agency and or Local Contacts

First Name Stetson **Last Name** Sannes

Title
Environmental Specialist

Organization Name
Hilcorp Alaska, LLC

Phone Type	Number	Extension
Business	9075644665	

Email
stetson.sannes@hilcorp.com

Attachments

Copy of Federal Application (USACE, EPA, or FERC, etc.)
Confidential Attachment
Reason for Confidentiality
Culture resource contained within USACE Application.
Comment
Confidential

Figures and/or Drawings/Plan Sets. To include a map or diagram of the proposed activity site, including the proposed activity boundaries in relation to local streets, roads, and highways.
Confidential Attachment
Reason for Confidentiality
Culture resource contained within USACE Application.
Comment
Confidential

Document Attachments
NONE PROVIDED
Comment
NONE PROVIDED

Delegation of Authority for Submission of Application
NONE PROVIDED
Comment
NONE PROVIDED

As per 18 AAC 15.030 signing of applications, all permit or approval applications must be signed as follows:
1) in the case of corporations, by a principal executive officer of at least the level of vice president or his duly authorized representative, if the representative is responsible for the overall management of the project or operation;
2) in the case of a partnership, by a general partner;
3) in the case of a sole proprietorship, by the proprietor; and
4) in the case of a municipal, state, federal or other public facility, by either a principal executive officer, ranking elected official, or other duly authorized employee.
The project proponent hereby certifies that all information contained herein is true, accurate, and complete to the best of my knowledge and belief. The project proponent hereby requests that the certifying authority review and take action on this CWA 401

certification request within the applicable reasonable period of time.