# PROJECT DESCRIPTION

# Ivan River Unit Pad Expansion

Hilcorp Alaska, LLC

**Hilcorp Alaska, LLC**
**3800 Centerpoint Drive, Suite 1400**
**Anchorage, AK 99503**

**July 2024**

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## 1.0 APPLICANT

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## 2.0 PROJECT OVERVIEW

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.

Specific acreage of fill and existing fill in the watershed are provided in Table 1. Total acreage listed are final grade estimates.

**Table 1: Lewis River Watershed (190205051305)**

| | |
|---|---|
| Total HUC 12 Acreage | 39,708 |
| Existing Gravel Acreage in watershed | 33.9 |
| Proposed new Ivan River Pad Gravel Acreage | 2.1 |
| Total Watershed Gravel Acreage with Expansion | 36 |
| % Total Gravel Footprint in HUC | 0.09% |

The maps and drawings included with this document provide additional details on the project components. No utility services (e.g., water, sewer, electricity, etc.) or permanent camp/lodging facilities are planned for any portion of the Ivan River Pad at this time.

## 3.0 PROJECT LOCATION

The Ivan River Pad area is located in South Central Alaska on lands owned by the state of Alaska and within the Susitna Flats Game Refuge. The project is approximately 17 miles by car from Beluga, a census-designated place. Figures 1, 4, and 5 of Attachment B show the Ivan River Pad location; location data is also provided in the following table:

**Table 2: Project Location Information**

| Project Name | Latitude | Longitude | MTRS | USGS Quadrangle |
|---|---|---|---|---|
| Ivan River Pad Expansion | 61.239444 | -150.797778 | T13S R9W S1 Seward Meridian | Tyonek A-3 |

## 4.0 PROJECT PURPOSE AND NEED

The purpose of the Ivan River gravel pad is to expand the available working area to support natural gas development operations. The pad construction will support current and future exploration and development activities.

## 5.0 DEVELOPMENT SCHEDULE

The proposed schedule developed by Hilcorp is highly dependent on obtaining necessary permit authorizations, weather, and associated factors of gravel mining, movement, and placement. 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. The gravel is proposed to be placed in the late fall 2024 to early spring of 2025. The expansion gravel will be placed from the existing pad to minimize additional impacts to area wetlands.

In summary, the development schedule is as follows:

- Fall 2024: Obtain permit authorization and conduct final survey activities for project components
- Fall 2024 – Spring 2025: Gravel haul and placement
- Summer 2025: Re-work gravel and complete proposed project

# 6.0 PROJECT COMPONENTS

The Ivan River Pad will require the fill of 2.1-acres of Waters of the U.S. The location and design are shown in Figures 1-3 below. The Ivan River pad will be constructed with a minimum gravel fill to match grade of the existing Ivan River Pad, using 2V:1H side slopes to reduce the fill footprint to the minimum necessary to accomplish the purpose and need. The total 2.1-acre pad will involve 14,100 cubic yards of gravel fill material.

## 6.1 Material Site

The material is currently available; therefore, the project will not involve the development of a new material source. The gravel fill required for construction of the Ivan River Pad will be obtained from a nearby pad remediation or other already permitted source.

# 7.0 CONTINGENCY PLANS

Hilcorp has a Spill Prevention, Control and Counter-measure Plan (SPCC). The SPCC plan complies with federal EPA regulations set forth in 40 Code of Federal Regulations (CFR) Part 112. This plan documents Hilcorp's abilities and procedures to prevent oil and hazardous materials spills. It also documents response actions in the event of a spill of oil and/or hazardous materials, copies of this plan are available upon request.

# 8.0 WILDLIFE ACCESS

The Ivan River Pad will not result in any barriers to wildlife access or movement other than the physical presence of the Ivan River Pad gravel. Hilcorp has an existing Wildlife Avoidance and Interaction Plan that will be utilized for construction and future activities as necessary. This plan can be provided upon request. The nearest tide station listed in the USACE Alaska District Tidal Data is at Fire Island with High Tide Line and Mean High Water at 32.8 and 26.2 feet, respectively. The current elevation of the proposed fill area is 20 feet above mean sea level; therefore, the project is not located with the tidal waters of the Cook Inlet so no Cook Inlet Beluga Whale Critical Habitat would be impacted.

# 9.0 AIR EMISSIONS

Air emissions from the equipment used for the construction of the Ivan River Pad are characterized as non-point mobile sources. No specific construction or operating air permits are required from the Alaska Department of Environmental Conservation. The equipment slated for use for the Ivan River Pad includes bulldozers, loaders, gravel haul trucks, light duty vehicles, a

compactor, excavator, and other similar emission sources. These emission sources are standard equipment that has been used on numerous other construction projects in the past.

## 10.0 ARCHAEOLOGICAL AND CULTURAL RESOURCES

An archaeological and cultural resource survey clearance of the proposed gravel pad area was conducted in July 2022. According to this report, no cultural resources would be affected. For more information, see Appendix A below.

## 11.0 ADDITIONAL ENVIRONMENTAL INFORMATION

The wetlands habitat in the project area has been classified by United States Fish and Wildlife Service National Wetland Inventory as an estuarine intertidal persistent emergent wetland that is regularly flooded (E2EM1N). Common features of this type of wetland include salt-to-brackish water marsh, with persistent vegetation, and is topographically low. However, a site survey has confirmed that the proposed project area is located above the High Tide line of Cook Inlet; therefore, the wetlands are better classified at Palustrine Emergent persistent seasonally flood/saturated (PEM1E). Figure 5 shows the type and extent of current wetlands mapped at the project site. A desktop analysis for endangered species was performed; no species are believed to be present in the project area. As stated above the project lies above designated critical habitat for the Cook Inlet Beluga Whale.

**Table 3. Key Permits, Approvals, and Other Potential Requirements for Project**

| Agency | Permits, Approvals, and Other Requirements |
|---|---|
| Federal Agencies | |
| United States Army Corps of Engineers | • Clean Water Act Section 404 Individual Permit<br>• River and Harbors Act Section 10 Individual Permit |
| State Agencies | |
| Alaska Department of Natural Resources | • Cultural Resource Coordination/Consultation with State Historic Preservation Officer under NHPA Section 106 |
| Alaska Department of Natural Resources - Division of Mining, Land and Water, Water Resources Section | • Temporary Water Use Authorization<br>• Land Use Permit |
| Alaska Department of Fish and Game | • Special Area Permit |

# 12.0 APPLICANT MITIGATION STATEMENT

## 12.1 Avoidance

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.

## 12.2 Minimization

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

## 12.3 Compensatory Mitigation

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).

Hilcorp performed the Thought Process using the maximum estimated footprint for all project features. Hilcorp's response to each of the above six items are shown below:

1. The project is not located in rare, difficult to replace, or threatened wetlands or areas of designated Critical Habitat.
2. The project does impact greater than 1/10th acre of wetlands. However, the single watershed in which the proposed project is located is not significantly deteriorated. Additional information on that aspect is provided below.
3. The project does not impact intertidal waters associated with special aquatic sites. The current Alaska District Tide Tables indicate that the project is above the high tide line.
4. According to the Alaska Department of Fish & Game's Alaska Fish Resource Monitor fill placement would be greater than 500-feet from the nearest point of Lewis River, which is a fish-bearing anadromous water.
5. The project is not federally funded.
6. The project is not a large-scale project with adverse aquatic resource impacts. Additional information is provided below.

## Rare, Difficult to Replace or Threatened Wetlands, or Designated Critical Habitat

## Current Watershed Condition and Proposed Impacts

The proposed project will involve placing 2.1-acre permanent gravel fill in the Lewis River watershed (HUC Code 190205051305).

As shown below in Table 4, the proposed total permanent fill for the project, combined with existing disturbance, would result in a maximum new percent disturbance of 0.09% to the watershed. Hilcorp's proposed project would only contribute an additional 0.005% disturbance to that watershed.

**Table 4: Total Watershed Disturbance**

| Watershed (12-digit HUC) | Total Watershed (Acres) | Existing Disturbance (Acres) | Expanded Ivan River Pad Disturbance (Acres) | Expanded Ivan River Pad Disturbance (%) | Total Disturbance (%) |
|---|---|---|---|---|---|
| Lewis River Watershed (190205051305) | 39,708 | 33.9 | 2.1 | 0.005% | 0.09% |

## Project Scale and Impact Severity

As shown above in Table 4, constructing the project will result in 0.09% total disturbance in the watershed, including existing disturbance. Hilcorp has incorporated several project design features and adopted avoidance and minimization measures into the project to avoid adverse aquatic resource impacts, while still meeting the overall project purpose and need. The avoidance and minimization in combination with the size of the overall watersheds and number of wetlands in those watersheds will result in minor overall impacts to aquatic resources.

Based on the above results of applying the Thought Process, combined with the project's proposed avoidance and minimization measures, additional compensatory mitigation for the 2.1-acres of jurisdictional wetlands does not appear necessary. Therefore, Hilcorp is not proposing additional compensatory mitigation. If the USACE determines compensatory mitigation is necessary, Hilcorp will work with USACE to identify a practicable compensatory mitigation solution.