REMOVAL PLAN

Doyon Drilling Rig Decommissioning and Removal
Tract 27 – 4-Acre Gravel Pad
Prepared for: Alaska Department of Natural Resources (ADNR)
Prepared by: NES
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1. Project Overview

NES proposes to lease **Tract 27** located in Deadhorse Alaska, a 4-acre usable gravel pad as identified by ADNR, for temporary staging, decommissioning, dismantling, and removal of a Doyon drilling rig.

The drilling rig will be transported to the site and systematically deconstructed over an anticipated period of 6 to 12 months. Salvageable components will be relocated to Doyon-owned property. Damaged or non-salvageable metal will be recycled. Non-recyclable waste materials will be transported to the Oxbow Landfill for final disposal.

This Removal Plan represents NES's current projection of the anticipated work scope, sequencing, environmental controls, and timeline based on available information. Actual field conditions, contractor availability, weather constraints, regulatory requirements, and unforeseen technical factors may necessitate adjustments to work methods, sequencing, and duration. NES will coordinate any substantive modifications with ADNR to ensure continued compliance with lease conditions and environmental protection requirements.

2. Project Objectives

- Safely decommission and dismantle the drilling rig.
- Prevent environmental contamination of soil, groundwater, and surrounding areas.
- Segregate materials for reuse, recycling, and disposal.
- Restore the gravel pad to pre-use conditions upon completion.
- Maintain compliance with all applicable State of Alaska and federal regulations.
- Adapt work sequencing as necessary while maintaining environmental and safety standards.

3. Site Description

- **Location:** Tract 27 (ADNR-managed lands)
- **Coordinates:** 70°13'34.07"N 148°24'27.79"W
- **Area:** 4-acre gravel pad (existing, usable surface)
- **Surface:** Compacted gravel
- **Intended Use:** Temporary staging, dismantling, material segregation, and loading operations

No ground disturbance beyond the existing gravel pad is anticipated. If unforeseen site conditions require deviation from this assumption, ADNR will be notified prior to implementing changes.

4. Scope of Work

4.1 Mobilization

- Transport drilling rig to Tract 27.
- Install temporary containment systems and environmental protection controls.
- Establish designated zones:
    - Rig dismantling zone
    - Salvage storage zone
    - Scrap metal staging area
    - Waste containment area
    - Fluid management area

4.2 Decommissioning

All bulk operational fluids were evacuated from the drilling rig prior to transport to Tract 27. No bulk quantities of fuel, lubricants, hydraulic oils, or coolants will be brought to or stored on-site as part of the rig structure. Decommissioning activities at Tract 27 will address residual fluids only that may remain within enclosed systems, fittings, hoses, or mechanical components.

- Manage and collect any residual fluids (including fuel, lubricants, hydraulic oils, and coolants) that may remain within lines, fittings, pumps, or reservoirs.
- All hydraulic hoses and other fluid-containing lines will be capped, plugged, or otherwise sealed prior to transport and handling to prevent releases.

- Capped hoses and fittings will be wrapped with absorbent materials and secured to capture incidental drips during transport, staging, or dismantling.
- Residual fluids will be drained, if encountered, within designated containment areas over impermeable liners and into approved containers placed within secondary containment.
- No intentional discharge of fluids will occur on the gravel pad.
- Remove batteries, filters, and any regulated components in accordance with applicable state and federal requirements.
- Secure all pressure-containing vessels prior to disassembly to prevent unintended release.

4.3 Dismantling & Segregation

- Systematic dismantling using cranes and heavy equipment.
- Segregation into:
    - Reusable components
    - Scrap metal for recycling
    - Regulated waste
    - Non-recyclable waste

Work sequencing may be modified depending on contractor logistics, equipment availability, and seasonal conditions.

4.4 Material Disposition

- **Reusable components:** Transported to Doyon property.
- **Recyclable metals:** Sent to approved recycling facilities.
- **Non-recyclable waste:** Transported to Oxbow Landfill.
- **Regulated materials:** Managed in accordance with ADEC and federal regulations.

5. Environmental Protection Measures

5.1 Secondary Containment & Liners

To prevent contamination:

- Heavy-duty impermeable liners (minimum 20-mil polyethylene or equivalent) will be placed beneath:
    - Fluid draining areas

    - Hydraulic component dismantling zones
    - Temporary fluid storage tanks
- Bermed containment (portable spill berms) will be used for:
    - Drip-prone components
    - Fuel tanks
    - Hydraulic reservoirs

Containment strategies may be enhanced if field conditions warrant additional protective measures.

5.2 Fluid Management

- All fluids will be drained prior to dismantling.
- Fluids will be collected in DOT-approved containers.
- Containers will be clearly labeled and stored within secondary containment.
- Waste fluids will be transported by licensed haulers to approved disposal or recycling facilities.

5.3 Spill Prevention & Response

- A site-specific Spill Prevention and Response Plan (SPRP) will be implemented.
- Spill kits staged at:
    - Work areas
    - Fuel storage locations
    - Equipment maintenance areas
- All personnel trained in spill response procedures.
- Any reportable spill will be immediately reported to the appropriate regulatory agency.

5.4 Stormwater & Runoff Control

- Work will remain confined to the gravel pad.
- If required, perimeter wattles or berms will be installed to prevent off-site migration.

- Liners will be inspected regularly for integrity.
- Contaminated gravel (if any) will be removed and properly disposed.

5.5 Hazardous Materials Management

If encountered, the following will be handled per regulation:

- Lead-acid batteries
- Used oil filters
- Fluorescent bulbs
- Suspected asbestos-containing materials
- PCB-containing components (if identified)

Testing will be conducted if necessary, prior to disposal.

6. Health & Safety

- Contractors will operate under an approved Site Safety Plan (SSP).
- All personnel will receive safety orientation.
- Proper PPE required:
    - Hard hats
    - Safety glasses
    - Gloves
    - Steel-toe boots
    - Fall protection where required
- Equipment operators will be properly certified.

7. Work Timeline (Estimated 6–12 Months)

Note: The following schedule is projected and may shift based on weather conditions, contractor availability, logistical considerations, or unforeseen technical issues.

Phase 1 – Mobilization (Month 1)

- Site preparation

- Containment installation
- Rig delivery

Phase 2 – Fluid Removal & Hazard Mitigation (Months 1–2)

- Drain fluids
- Remove regulated components
- Secure tanks and pressure systems

Phase 3 – Structural Dismantling (Months 2–8)

- Major structural components removed
- Segregation and transport of salvage materials
- Ongoing recycling and disposal

Phase 4 – Final Material Removal (Months 8–11)

- Remove remaining scrap
- Remove waste materials
- Conduct environmental inspection

Phase 5 – Site Restoration & Demobilization (Months 11–12)

- Remove liners and containment systems
- Inspect gravel pad
- Remove contaminated gravel if necessary
- Final site grading and stabilization

Any substantial extension beyond 12 months will be communicated to ADNR with justification.

8. Site Restoration

Upon completion:

- All materials, debris, and equipment will be removed.
- Containment liners will be removed and disposed of properly.
- Gravel surface inspected for staining or contamination.
- Any contaminated material will be excavated and disposed of appropriately.
- Final condition documentation (photos and written report) will be submitted to ADNR.

9. Inspections & Documentation

- Weekly internal environmental inspections.
- Monthly summary report (if required by ADNR).
- Spill documentation (if applicable).
- Waste manifests retained.
- Final close-out report submitted upon completion.

10. Conclusion

NES and other designated contractors will conduct all decommissioning and removal activities in a manner that prioritizes environmental protection, worker safety, and regulatory compliance. The use of impermeable liners, secondary containment, spill response procedures, and controlled material handling will ensure protection of Tract 27 throughout the anticipated 6–12 month project duration.

This plan reflects NES's best current projection of work scope and sequencing. Adjustments may be necessary as field conditions evolve, and NES will coordinate with ADNR to ensure continued compliance and site protection throughout the project lifecycle.