

# **PROJECT DESCRIPTION**

## **Beluga River Gas Storage Pad**



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## 1.0 APPLICANT

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## 2.0 PROJECT OVERVIEW

Hilcorp Alaska, LLC (Hilcorp) is proposing to construct a natural gas storage pad and associated pipeline infrastructure within Beluga River, north of the existing Chugach Electric Association power plant. Throughout this document, the proposed project will be referred to as the BRU Gas Storage Pad.

The proposed project will involve placement of clean gravel fill to support expanded natural gas operations in the Beluga River. The overall pad is estimated to total 7.38 acres in size. 2.35 acres of jurisdictional palustrine wetlands as defined by the U.S. Army Corps of Engineers (USACE) will be directly impacted/lost as a result of this project through the placement of approximately 17,682.3 cubic yards of gravel fill. Since the proposed 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 2026 and will continue through the winter season of 2026/2027 as needed.

Acreage value and percentage of fill increase to the watershed are provided in Table 1. Total acreage listed are final grade estimates.

**Table 1: Indian Creek – Frontal Cook Inlet Watershed (190206011904)**

|                                                                          |        |
|--------------------------------------------------------------------------|--------|
| Total HUC 12 Acreage                                                     | 46,582 |
| Proposed BRU Gas Storage Pad Gravel Addition Total (acres)               | 7.38   |
| Proposed BRU Gas Storage Pad Gravel Addition Impacts to Wetlands (acres) | 2.35   |
| Percent Increase of Total Gravel Acreage in HUC (%)                      | 0.02%  |

The maps and drawings included with this document provide additional details on the project components. The pad will be sized and graded to accommodate a phased build-out, ultimately supporting up to 10 storage wells and associated surface facilities, though these components will not be permitted or constructed at the time of this application.

### 3.0 PROJECT LOCATION

The proposed BRU Gas Storage Pad area is located in Southcentral Alaska, along the west side of Cook Inlet, approximately 35 air miles from Anchorage. Figures 1 and 4 of Appendix A show the project location in more detail. Additionally, location data is provided below:

**Table 2: Project Location Information**

| Project Name                 | Latitude    | Longitude     | MTRS                             | USGS Quadrangle |
|------------------------------|-------------|---------------|----------------------------------|-----------------|
| Beluga River Gas Storage Pad | 61.190300 N | -151.034400 W | T13N R10W S27<br>Seward Meridian | Tyonek A-3      |

### 4.0 PROJECT PURPOSE AND NEED

The purpose of the project is to construct a natural gas storage pad and associated infrastructure. These construction activities will support expanded natural gas storage in the area.

### 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 will be sourced from a local existing material site 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 fall of 2026. Gravel will be placed from the existing roads and infrastructure to minimize impacts to area wetlands.

In summary, the development schedule is as follows:

- Fall 2026: Obtain permit authorization and conduct final survey activities for project components
- Fall 2026: Gravel haul and placement
- Winter 2026/2027: Re-work gravel as needed and complete proposed project

### 6.0 PROJECT COMPONENTS

The BRU Gas Storage pad will require the fill of 2.35 acres of wetlands. The proposed location and design are shown in Figures 1-3 below. The pad will be constructed using 2V:1H side slope design to reduce the fill footprint to the minimum necessary to accomplish the purpose and need. Approximately 17,682.3 cubic yards of gravel fill material will be placed in area wetlands.

#### 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 pad expansion will be obtained from an 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.

## **8.0 WILDLIFE ACCESS**

The BRU Gas Storage Pad will not result in any barriers to wildlife access or movement other than the physical presence of the 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.

A desktop analysis for endangered species was performed; no species are believed to be present in the project area.

## **9.0 AIR EMISSIONS**

Air emissions from the equipment used for the construction of the 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 pad construction includes bulldozers, loaders, gravel haul trucks, light duty vehicles, a compactor, 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 ADDITIONAL ENVIRONMENTAL INFORMATION**

The wetlands habitat in the project area has been classified by United States Fish and Wildlife Service National Wetland Inventory as a mix of palustrine scrub-shrub and forested wetlands. These are non-tidal wetlands dominated by woody vegetation that may be either deciduous or coniferous. Figure 4 shows the type and extent of current wetlands mapped at the project site.

A riverine system believed to be relatively permanent was found within the surveyed area, flowing in a southerly direction. In the field, this system was noted to have defined banks, be 4 feet (1.2 m) wide, and be approximately 2 inches (5.1 cm) deep, although the depth may vary with local precipitation levels.

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

| Agency                                | Permits, Approvals, and Other Requirements                                                      |
|---------------------------------------|-------------------------------------------------------------------------------------------------|
| Federal Agencies                      |                                                                                                 |
| United States Army Corps of Engineers | <ul style="list-style-type: none"><li>• Clean Water Act Section 404 Individual Permit</li></ul> |
| Local Agencies                        |                                                                                                 |
| Chugach Electric Association          | <ul style="list-style-type: none"><li>• Letter of Non-Objection</li></ul>                       |
| Cook Inlet Regional Inc.              | <ul style="list-style-type: none"><li>• Letter of Non-Objection</li></ul>                       |

## **11.0 APPLICANT MITIGATION STATEMENT**

### **11.1 Avoidance**

The proposed project area contains jurisdictional waters of the United States; therefore, complete avoidance is not practicable. Hilcorp proposes to include the following practicable avoidance measures:

- Project limits will be delineated with silt fencing or similar material to avoid impacts outside the proposed pad construction area
- Work will occur from existing infrastructure to avoid additional temporary impacts to Waters of the U.S.

### **11.2 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

### **11.3 Compensatory Mitigation**

Hilcorp evaluated the unavoidable fill proposed for the BRU Gas Storage 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.
4. According to the Alaska Department of Fish & Game's Alaska Fish Resource Monitor fill placement would be less than 500-feet from the nearest point of Beluga Power Plant Creek, which is a fish-bearing anadromous water, though there are no plans to place fill within Beluga Power Plant Creek. This paired with other implemented mitigation measures and the presence of existing infrastructure in the area should preserve the anadromous habitat.
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.

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

### **11.4.1 Current Watershed Condition and Proposed Impacts**

The proposed project will involve placing 7.38 acres of permanent gravel fill in the Indian Creek – Frontal Cook Inlet watershed (HUC Code 190206011904).

As shown above in Table 1, the proposed total permanent fill for the project would result in an additional 0.02% disturbance to the watershed.

### **11.4.2 Project Scale and Impact Severity**

Constructing the BRU Gas Storage Pad would result in an additional 0.02% disturbance to the watershed. 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 2.35 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.

## **Attachment A: Figures**

**Figure 1: BRU Gas Storage Pad Vicinity Map**

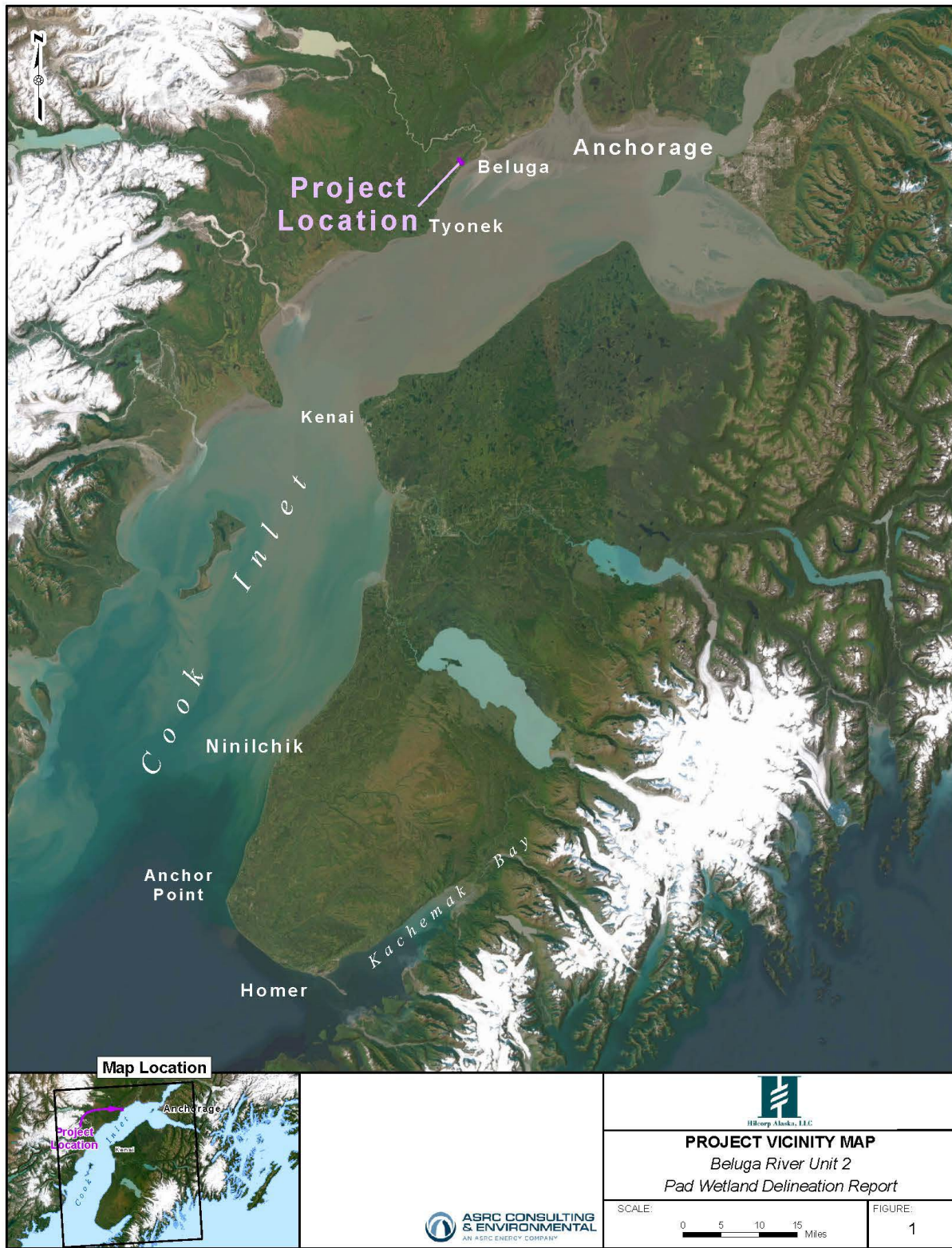


Figure 2: BRU Gas Storage Pad Project Overview

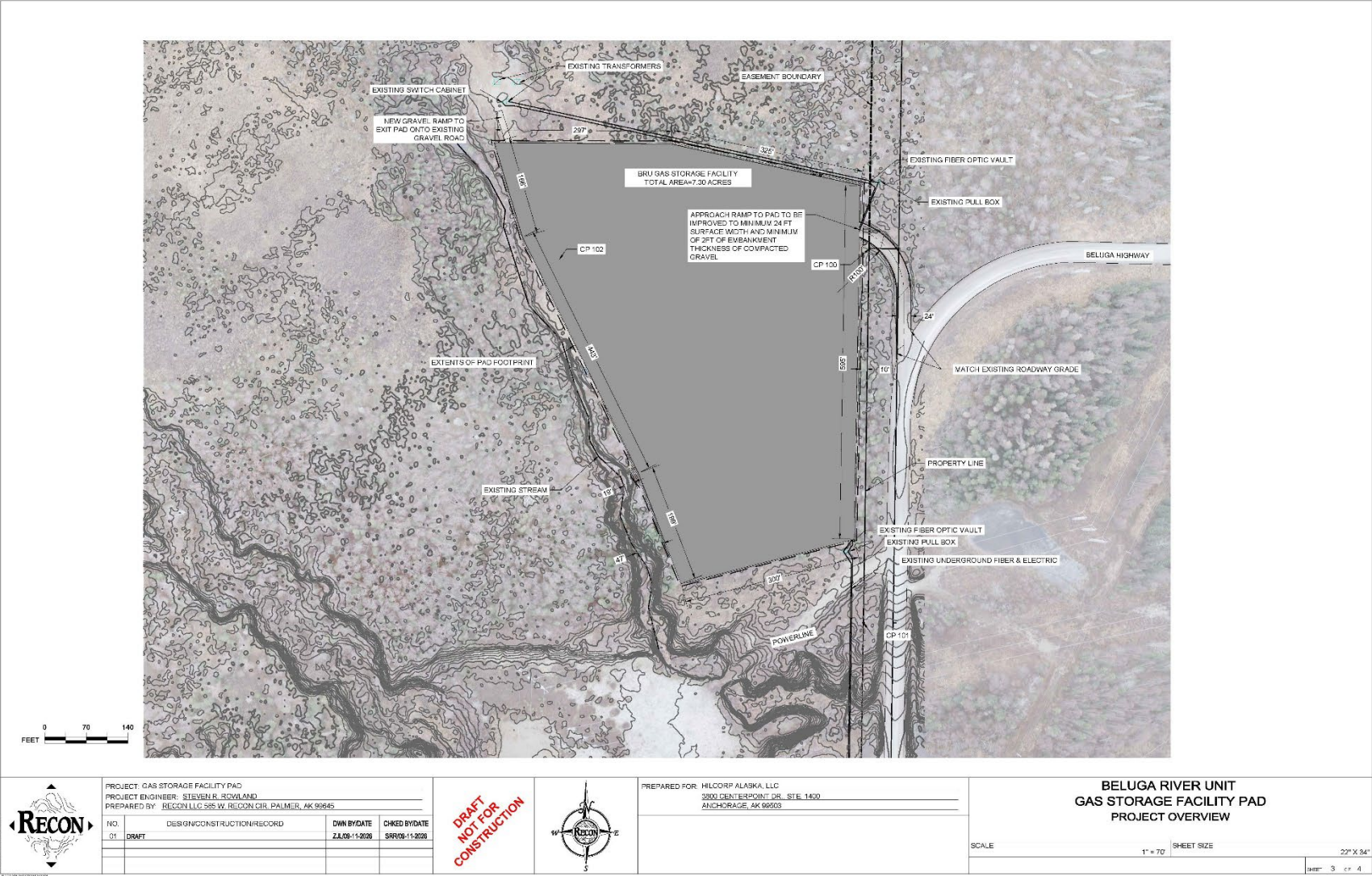
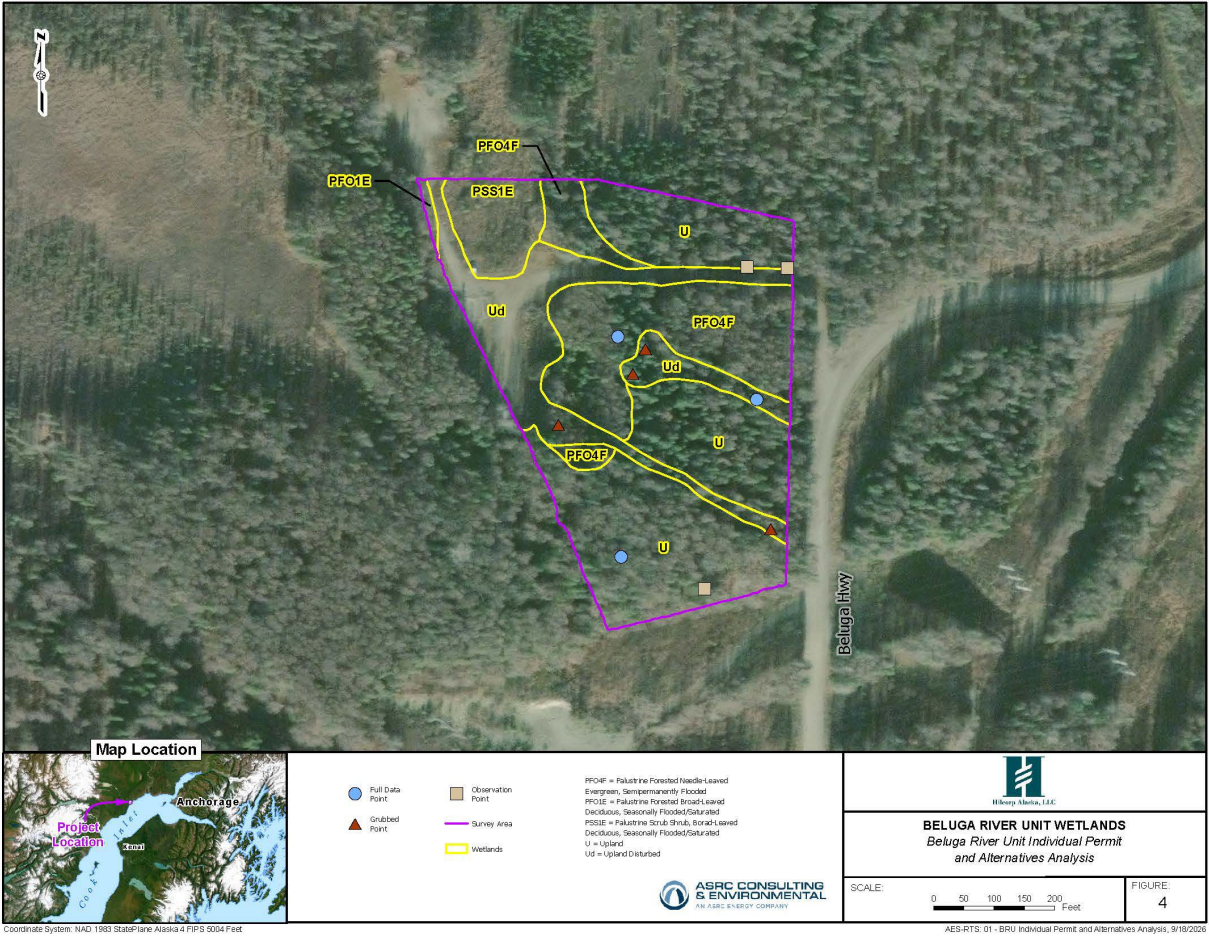




Figure 4: Kalotsa Site Pad Expansion Wetland Overview



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## **Attachment B: 2026 Wetland Delineation Report – Beluga River**

## **Attachment C: Alternatives Analysis**