PROJECT DESCRIPTION

Clam Gulch Pad

Hilcorp Alaska, LLC

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

October 2026

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1.0 APPLICANT

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2.0 PROJECT OVERVIEW

Hilcorp Alaska, LLC (Hilcorp) proposes to construct a gravel pad and pad access point, widen an existing road, install a 2-foot by 80-foot corrugated metal culvert, and install associated resource development infrastructure within the Kenai Peninsula, near the census-designated place of Clam Gulch, Alaska. Throughout this document, the proposed project will be referred to as the Clam Gulch Pad.

The proposed project will involve the placement of clean gravel fill and corrugated metal pipe to support expanded natural resource development in the area. An estimated 3.54 acres (1.43 hectares) of palustrine wetlands, as defined by the U.S. Army Corps of Engineers (USACE) will be directly impacted or lost as a result of this project through the placement of approximately 17,572.5 cubic yards of gravel fill. Since the proposed project is located in wetlands above the high-tide line of Cook Inlet, issuance of a USACE Section 404 Individual Permit (IP) is necessary for the project to proceed. Construction is anticipated to begin during the 2026–2027 winter season.

Table 1 summarizes the proposed wetland fill acreage and its percentage of the total HUC-12 watershed area. Total acreage values listed are final grade estimates.

Table 1: Corea Creek – Frontal Cook Inlet Watershed (190203010801)

Total Hydrologic Unit Code (HUC) 12 Watershed Acreage	52,982.83
Proposed Clam Gulch Pad Gravel Addition Impacts to Wetlands (acres)	3.54
Percent Increase of Gravel Acreage in HUC (%)	0.007%

3.0 PROJECT LOCATION

The proposed Clam Gulch Pad is located in Southcentral Alaska, on the west side of the Kenai Peninsula, approximately 30 miles by road from the city of Kenai, Alaska. Figures 1 through 11 in Attachment A show the project location, proposed components, and design details. Table 2 provides location information for the proposed project components.

Table 2: Project Location Information

Project Name	Latitude	Longitude	MTRS	USGS Quadrangle
Clam Gulch Pad	60.245498 N	151.380019 W	T02N R12W S21 Seward Meridian	Kenai A-4
Clam Gulch Road Widening	60.245452 N	151.379021 W	T02N R12W S21 Seward Meridian	Kenai A-4
Clam Gulch Access Point and Culvert	60.245150 N	151.380796 W	T02N R12W S21 Seward Meridian	Kenai A-4

Key: MTRS = meridian, township, range, and section

4.0 PROJECT PURPOSE AND NEED

The purpose of the project is to construct a gravel pad and access point, widen an existing road, and install a culvert that will support natural resource development activities in the area.

5.0 DEVELOPMENT SCHEDULE

The proposed schedule developed by Hilcorp is contingent on obtaining the necessary permits and authorizations, weather conditions, and factors affecting gravel extraction, transportation, and placement. Gravel will be sourced from an existing local material site near the road system and transported by truck to the proposed project site. Gravel placement is scheduled for winter 2026–2027. Gravel will be placed using existing roads and infrastructure to minimize impacts to surrounding wetlands.

The proposed development schedule is as follows:

- Fall 2026: Obtain necessary permit authorizations for project components
- Winter 2026–2027: Complete gravel fill placement and culvert installation
- Spring 2027: Rework gravel as needed and complete the proposed project

6.0 PROJECT COMPONENTS

Construction of the Clam Gulch Pad and associated infrastructure will require placing fill in 3.54 acres of wetlands. The proposed locations, designs, and calculated impacts of the project components are shown in Figures 1–11 of Attachment A. The pad, access point, and road widening will incorporate either a 2V:1H or 2.5:1 side slope design to minimize the fill footprint while meeting the project's purpose and need. Approximately 17,572.5 cubic yards of gravel fill will be placed in the affected wetlands.

Gravel fill for all project components is currently available from an existing permitted material source; therefore, development of a new material source will not be necessary.

7.0 CONTINGENCY PLANS

Hilcorp maintains a Spill Prevention, Control, and Countermeasure (SPCC) Plan. The SPCC Plan complies with U.S. Environmental Protection Agency (EPA) regulations under Title 40 of the Code of Federal Regulations, Part 112 (40 CFR Part 112). The plan describes Hilcorp's procedures for preventing and responding to spills of oil and hazardous materials.

8.0 WILDLIFE ACCESS

The Clam Gulch Pad is not expected to create barriers to wildlife access or movement beyond those associated with the gravel pad and widened road. Hilcorp maintains an existing Wildlife Avoidance and Interaction Plan that will be implemented during construction and future activities as necessary. The plan can be provided upon request.

A desktop analysis of the potential occurrence of federally listed threatened and endangered species was conducted; no listed species are known or expected to occur within the project area.

9.0 AIR EMISSIONS

Air emissions from construction equipment used for project activities will be generated primarily by mobile sources. No air permits for construction or operation are required from the Alaska Department of Environmental Conservation. The equipment proposed for use includes bulldozers, loaders, gravel haul trucks, light-duty vehicles, a compactor, and similar construction equipment.

10.0 ADDITIONAL ENVIRONMENTAL INFORMATION

The wetland habitats in the project area have been classified by U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) as a combination of palustrine emergent and palustrine scrub-shrub wetlands. These wetland types are non-tidal but are characterized by different vegetation communities; emergent wetlands are dominated by erect, rooted, herbaceous hydrophytes, whereas scrub-shrub wetlands are dominated by woody vegetation less than 19.7 feet (6 m) tall. Figure 11 shows the mapped wetland types and their extent at the project site.

A riverine system containing a series of culverts was identified within the surveyed area. The system borders and traverses the eastern and southern portions of the project area. Field observations indicate that the system has defined banks and is approximately 4 feet (1.2 m) wide and 3 inches (7.6 cm) deep, although water depth may vary with precipitation.

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

Agency	Permits, Approvals, and Other Requirements
Federal Agencies	
U.S. Army Corps of Engineers	• Clean Water Act Section 404 Individual Permit
State & Local Agencies and Private Landowners	
Alaska Department of Natural Resources – Division of Oil and Gas	• Unit Plan of Operations
Private Landowner	• Notice of Development

11.0 APPLICANT MITIGATION STATEMENT

11.1 Avoidance

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

- Project limits will be delineated with silt fencing or similar material to avoid impacts outside the proposed pad construction area.
- Construction activities will be conducted using existing infrastructure where practicable to avoid additional temporary impacts to Waters of the United States (WOTUS).

11.2 Minimization

Hilcorp will incorporate the following minimization measures into the project design and construction activities to reduce impacts to WOTUS:

- The pad and widened road will be constructed with a minimum side slope ratio of 2V:1H to minimize the fill area and impacts to wetlands.
- Exposed surfaces will be watered regularly during construction to minimize fugitive dust generation and deposition in surrounding areas.
- Existing gravel sources will be used to avoid impacts associated with developing a new material source.

11.3 Compensatory Mitigation

Hilcorp evaluated the unavoidable wetland impacts associated with the Clam Gulch Pad project using the USACE Alaska District's *Compensatory 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:

1. The project occurs in rare, difficult-to-replace or threatened wetlands, or areas of designated critical habitat (i.e., designated critical habitat for Cook Inlet Beluga whale).
2. The project impacts more than 0.1 acre of wetlands or other WOTUS or more than 300 linear feet of stream, and the watershed condition is such that compensatory mitigation is necessary to offset the project's unavoidable effects. Indicators of degradation of the watershed's aquatic environment may include impaired waters identified under Section 303(d) of the Clean Water Act, conditions identified in a watershed management plan, impervious surface cover, and developed land use.
3. Fill is placed in intertidal waters associated with special aquatic sites.
4. Fill is placed in fish-bearing waters or jurisdictional wetlands within a 500-foot buffer of such waters, when impacts are determined to be more than minimal.

5. The project is federally funded and compensatory mitigation is required under Executive Order 11990 to meet the national policy of no net loss of wetlands.
6. The project is a large-scale development with adverse aquatic impacts to aquatic resources, such as mining development, highway construction, airport construction, or pipeline and railroad construction (33 CFR 320.4(r)(2)).

Hilcorp conducted the Thought Process evaluation using the maximum estimated footprint for all proposed project features. Hilcorp's responses to each of the six criteria are listed below:

1. The project is not located in rare, difficult-to-replace, or threatened wetlands or areas of designated critical habitat.
2. The project would impact more than 0.1 acre of wetlands. However, the watershed containing the proposed project is not significantly degraded. Additional information regarding watershed conditions are provided in Section 11.4.1.
3. The project does not affect intertidal waters associated with special aquatic sites.
4. According to the Alaska Department of Fish and Game's Alaska Fish Resource Monitor tool, the proposed fill placement would occur more than 500 feet from the nearest point of Clam Gulch Creek, an anadromous, fish-bearing waterbody.
5. The project is not federally funded.
6. The project is not a large-scale development with adverse aquatic resource impacts. Additional information on project scale and impact severity is provided in Section 11.4.2.

11.4 Supplemental Compensatory Mitigation Evaluation

11.4.1 Proposed Impacts to the Existing Watershed

The proposed project will result in the permanent placement of gravel fill in approximately 3.54 acres of wetlands within the Corea Creek – Frontal Cook Inlet watershed (HUC 190203010801).

As shown above in Table 1, the proposed total permanent fill for the project would result in an additional 0.007% disturbance to the watershed.

11.4.2 Project Scale and Impact Severity

Construction of the Clam Gulch Pad and associated infrastructure would permanently affect 3.54 acres of wetlands, representing approximately 0.007% of the total watershed acreage. Hilcorp has incorporated design features and adopted avoidance and minimization measures to reduce

impacts to aquatic resources while meeting the project's purpose and need. These measures, together with the relatively small proportion of the watershed affected by the project, are expected to limit the overall extent of impacts to aquatic resources.

Based on the results of applying the Thought Process, combined with the project's proposed avoidance and minimization measures, additional compensatory mitigation for the 3.54 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.

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Attachment A: Figures

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Figure 1: Clam Gulch Pad Vicinity Map

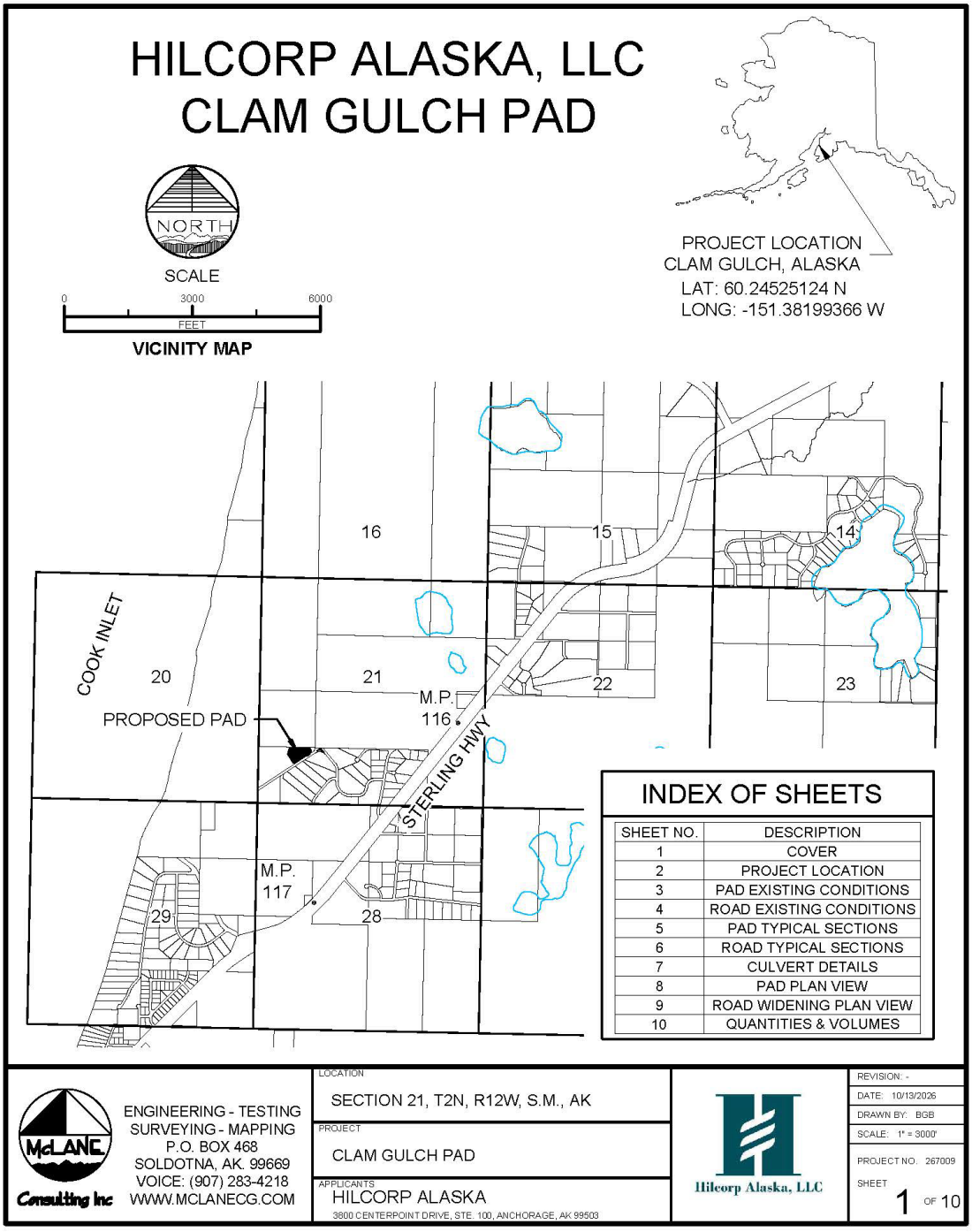


Figure 2: Clam Gulch Project Overview

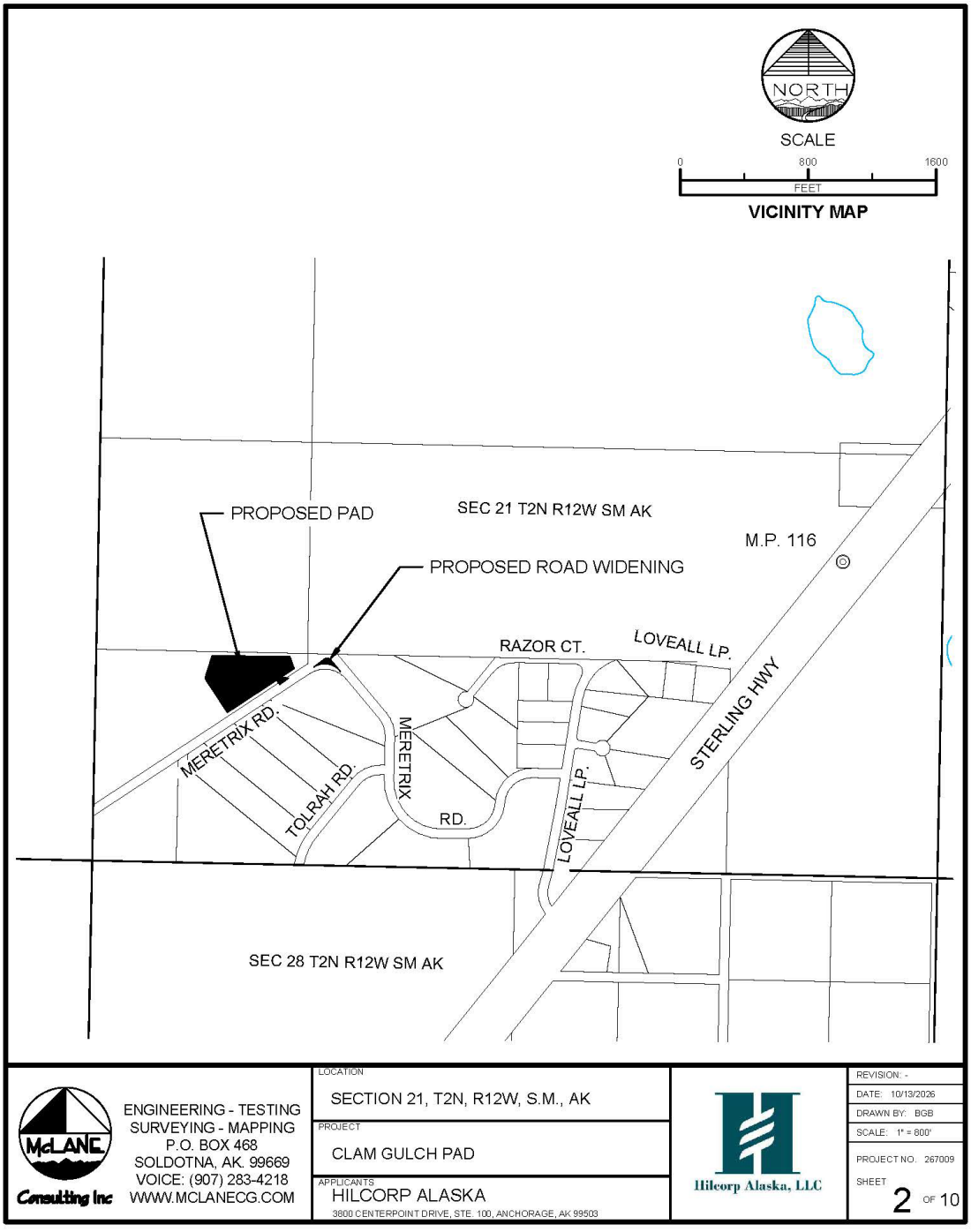


Figure 3: Clam Gulch Gravel Pad Area Overview

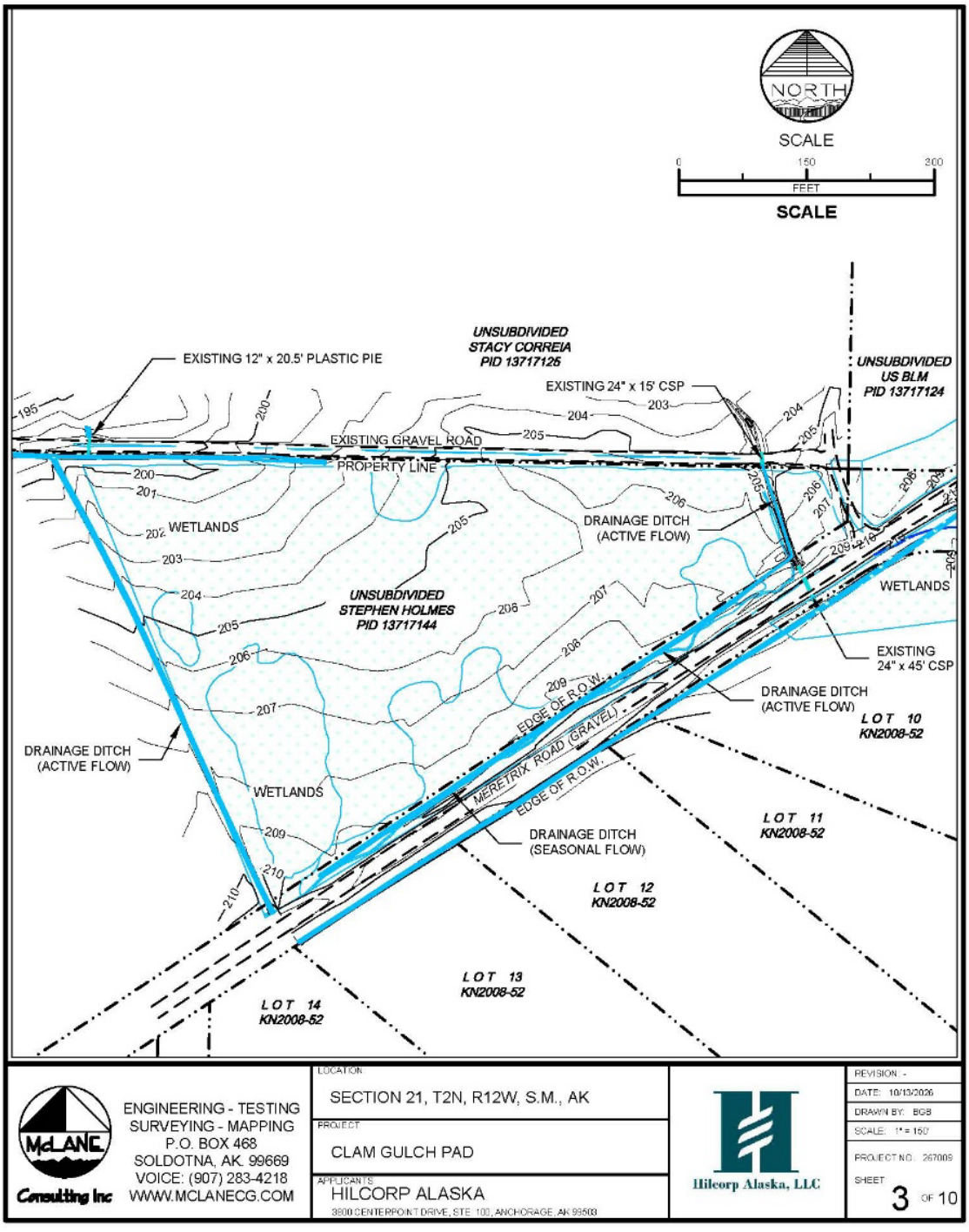


Figure 4: Clam Gulch Road Widening Area Overview

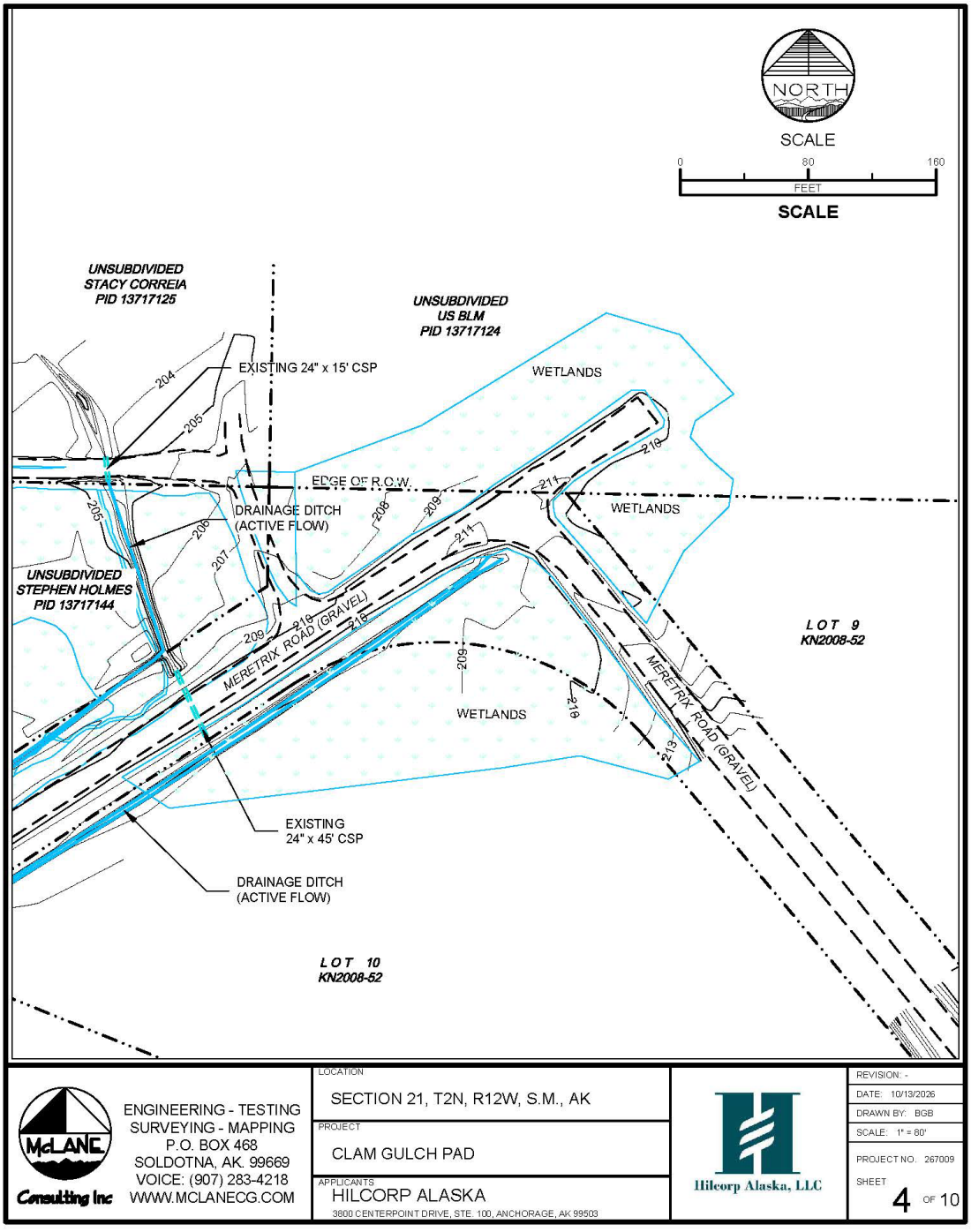


Figure 5: Clam Gulch Pad Embankment Typical

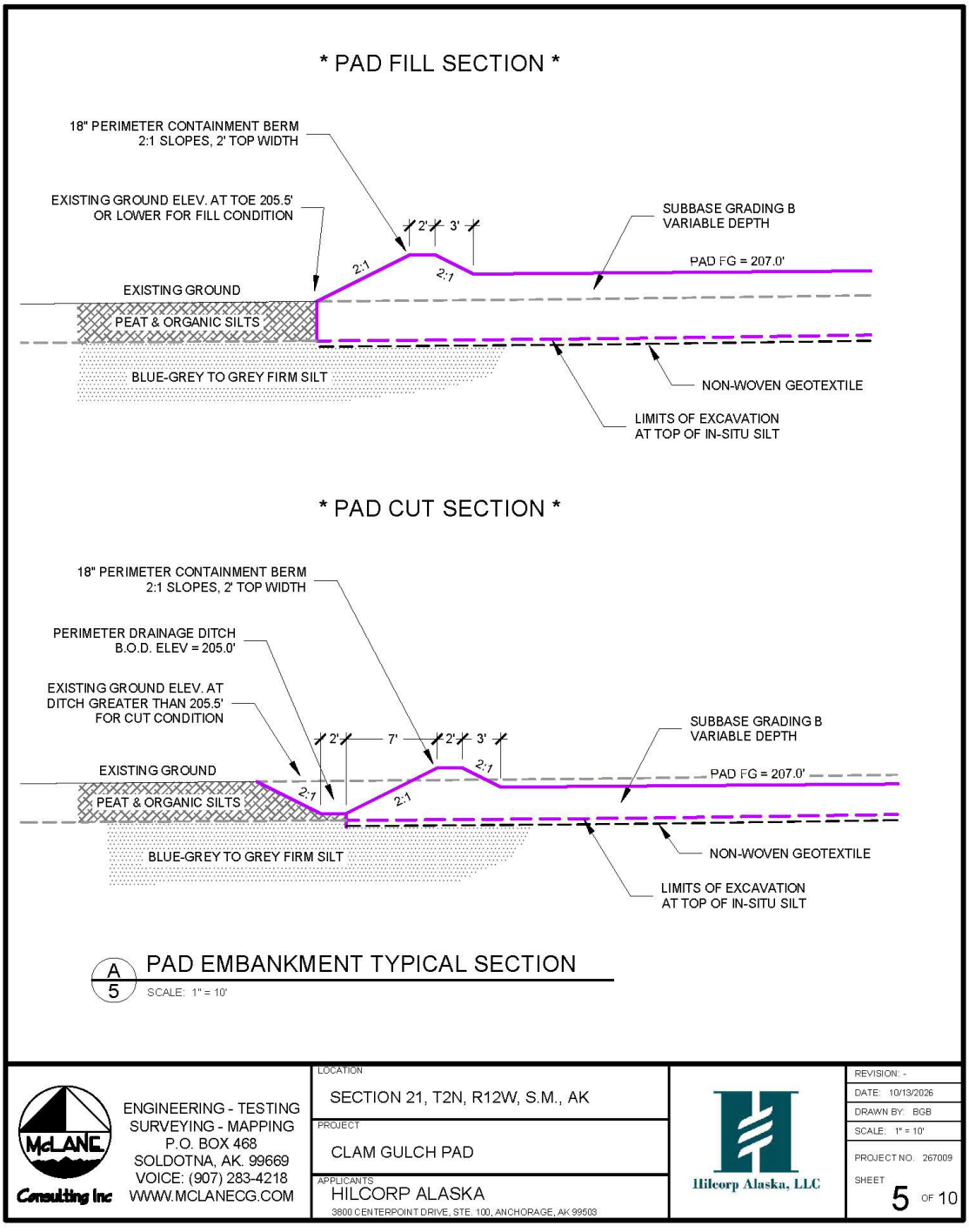


Figure 6: Clam Gulch Pad Access Point Typical

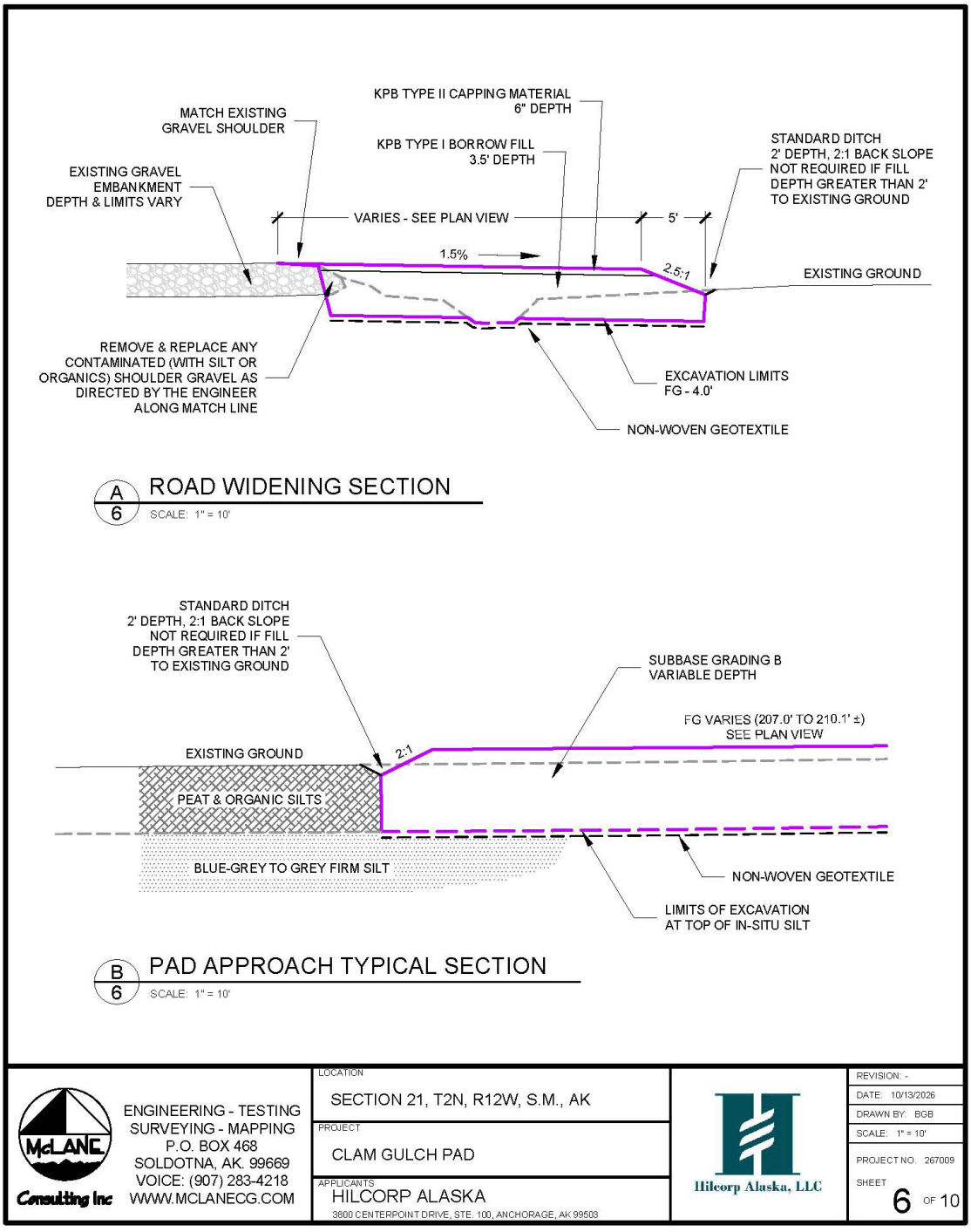


Figure 7: Clam Gulch Pad Corrugated Pipe Typical

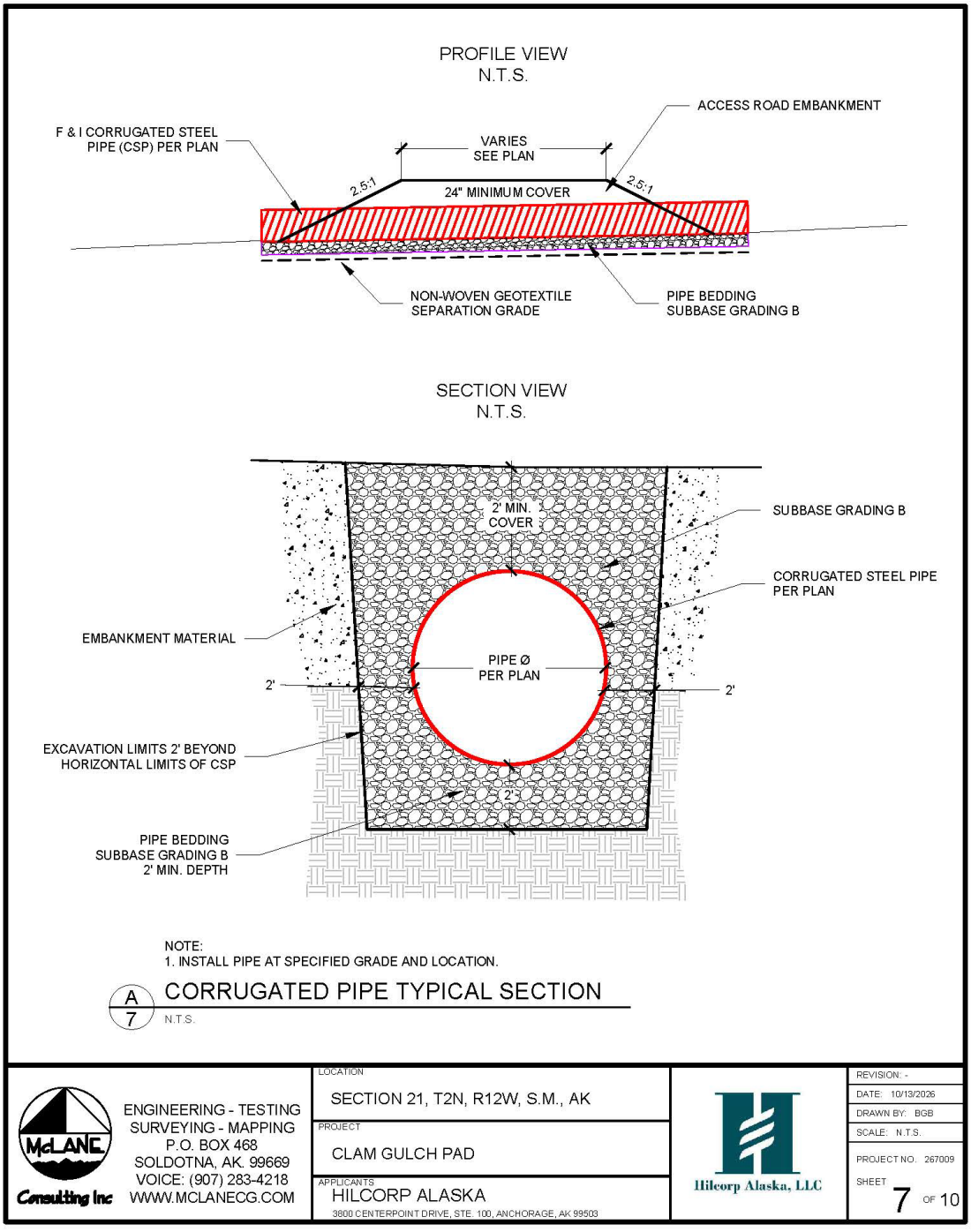


Figure 8: Clam Gulch Pad Design

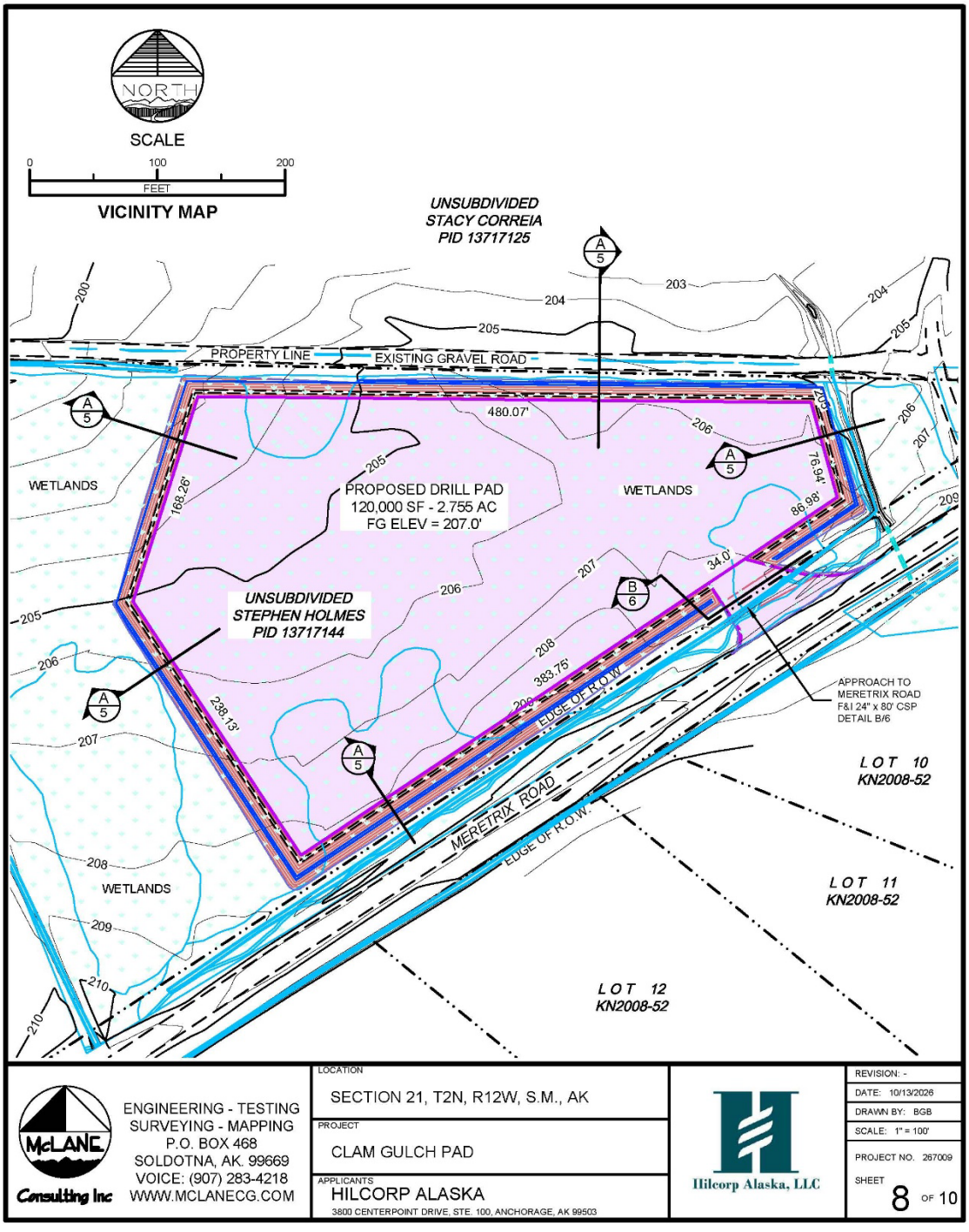


Figure 9: Clam Gulch Road Widening Design

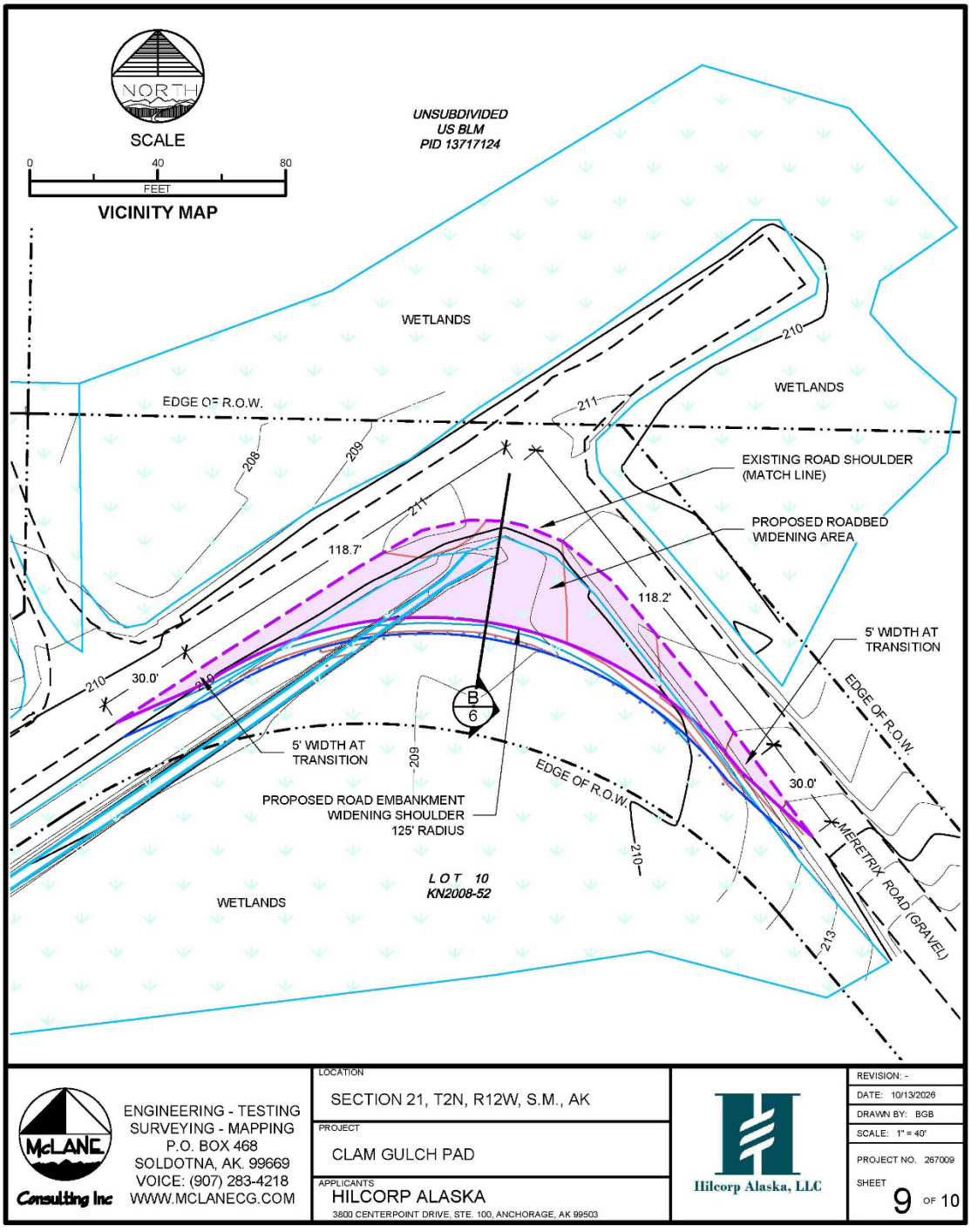


Figure 10: Clam Gulch Calculated Impacts

MERETRIX SHOULDER WIDENING			
IMPACTED WETLAND AREA	WETLAND EXCAVATION	TOTAL FILL	WETLAND FILL
4,703.0 SF	6,615 CF	18,792 CF	11,286 CF
0.108 AC	245 CY	696 CY	418 CY

24" X 80' CULVERT			
CULVERT DIAMETER	CULVERT LENGTH	PIPE BEDDING FILL IN CHANNEL	EXCAVATION
24 IN	80 FT	1,741 CF	1,992 CF
		64.5 CY	73.8 CY

PAD WETLAND IMPACT		
IMPACTED WETLAND AREA	WETLAND EXCAVATION	WETLAND FILL
149,626 SF	323,865 CF	461,430 CF
3.435 AC	11,995 CY	17,090 CY

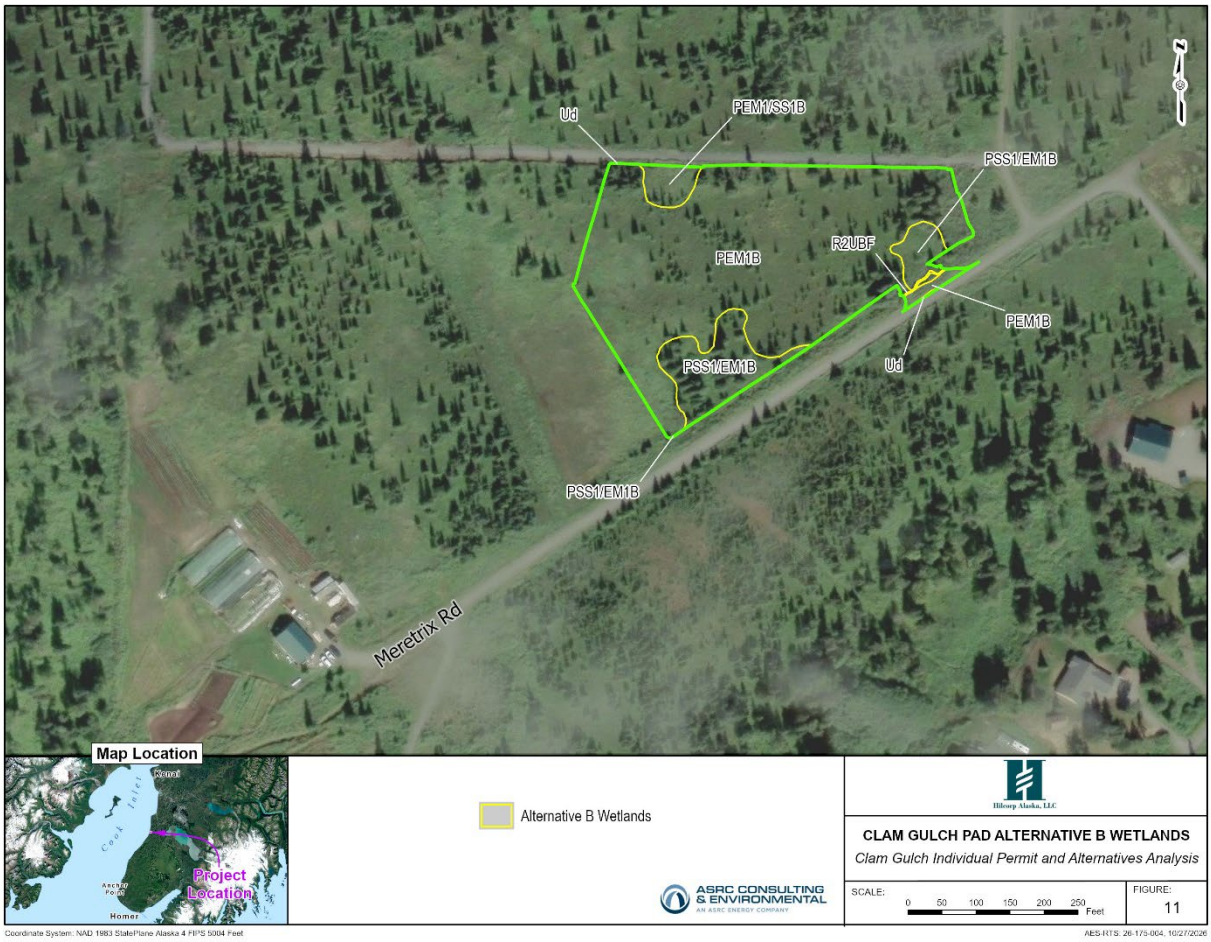
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Hilcorp Alaska, LLC

REVISION: -
DATE: 10/13/2026
DRAWN BY: BGB
SCALE: N/A
PROJECT NO. 267009
SHEET 10 OF 10

Figure 11: Clam Gulch Wetland Overview



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