

Description/Scope of Work for Proposed Action:

The proposed activity will occur in an area previously and extensively modified by human use. The activity will be light surface use and is expected to have minimal impact in the land use area. Stipulation 2.14 of the Renewal of the Agreement and Grant of Right-of-Way for the TAPS requires Alyeska to have a Contingency Plan (C-Plan) that addresses how to proceed in the event of an oil spill. The C-Plan includes detailed information for reconnaissance, response, and containment actions in the event of an oil spill along the pipeline. One aspect of the C-Plan is the designation of containment sites on BLM-managed lands for the placement of emergency oil spill containment equipment. Agency and Alyeska planners worked together to identify approximately 220 containment sites, half of which are on Federal land. Over time, Alyeska's oil spill exercise program expanded and many of the sites were used for training. During the summers of 2004 and 2005, the containment sites were resurveyed and detailed drawings were made for the sites to include staging areas, landing zones, and detailed response strategies for each site. Some sites contain helicopter landing zones, portable anchors, storage Conexes for spill response equipment, and/or culvert staging kits.

For oil spill response, Alyeska divided the pipeline into regions, contingency areas, and segments. These divisions are based on water drainage systems. The region boundaries are major river drainages that TAPS intersects, resulting in five regions. Each region plan is divided into contingency areas. A contingency area generally covers a distinct drainage pattern. The contingency areas are further subdivided into segments for containment actions, access and environmental information. The xx sites in this Right-of-Way Grant proposal fall within Area x.

According to the C-Plan, the specific contingency area plans include primary containment sites and containment zones which are designed to minimize damage to sensitive areas. Dependent on the magnitude of the spill and environmental conditions, on-scene initial responders may be required to devise additional containment measures and locations. For example, where feasible, an additional containment site to recover as much oil as possible will be established farther downstream at the leading edge of the spill.

Approximately every three years, or on an as-needed basis, the containment sites are brushed according to the attached Typical Containment Site Standby Grooming Plan to ensure quick access in the event of a spill. The grooming activities are performed with hand tools and do not disturb the soil cover or root systems of plants. No gravel or other imported material is placed on the sites. The grooming involves a small number of people and a limited amount of time – only enough to touch up the brushing and ensure access still exists.

Alyeska holds oil spill drills every three to five years. The drills take place at the containment sites, depending on the location of the drill. During a drill, a large number of people are deployed to the site ranging from a few hours to several days. In the event of an oil spill, a containment site may be occupied by twenty people for several months, depending on progress in containing the oil and cleanup after the spill.