



## REGION 10

SEATTLE, WA 98101

### **Response to Comments Regarding Underground Injection Control Permit AK-11024-A**

On September 27, 2023, the U.S. Environmental Protection Agency Region 10 (“EPA” or “The Region”) issued a 30-day public notice in the Anchorage Daily News soliciting comments and requests for a public hearing in advance of issuance of Class I Underground Injection Control (UIC) Permit, AK-11024-A, to Oil Search (Alaska) LLC (OSA). This permit will allow the construction and operation of up to three Class I non-hazardous waste disposal injection wells at the Nanushuk Processing Facility (NPF) Pad in support of development of the Pikka Unit at the North Slope, Alaska.

During the 30-day public notice period, EPA received comments from the permit applicant, OSA. No other comments were received from the public. A public hearing was neither requested nor held. The comments received from OSA were not substantive and make no material impact on the requirements nor outcome of the public notice; however, they do improve the clarity and accuracy of the permit and its fact sheet. The comments received during the 30-day public notice are presented below. They have been modified by EPA to improve context and clarity.

#### **Comment #1 – Submitted by email on October 20, 2023 by Erika Denman, Permitting Lead for Oil Search (Alaska), LLC**

Although the proposed injection wells at the NPF Pad will support development of the Pikka Unit, the NPF pad and proposed wells currently lie outside of the Pikka Unit boundary.

*EPA Response: EPA has reviewed the permit application and North Slope Unit Map prepared by the Alaska Department of Natural Resources and concurs with OSA. The Permit and fact sheet have been revised to state that the NPF Pad and proposed wells are adjacent to the Pikka Unit.*

#### **Comment #2 – Submitted by email on October 20, 2023 by Erika Denman, Permitting Lead for Oil Search (Alaska), LLC**

Although the draft permit and fact sheet describe the proposed surface hole locations [of the injection wells], the exact surface hole locations on the NPF Pad will be confirmed after wells are drilled.

*EPA Response: EPA acknowledges this comment and has revised the permit and fact sheet to state that exact surface locations of Class I wells on the NPF Pad will be confirmed after they are drilled and completed.*