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	<b>Water Use and Tracking</b>		Last Reviewed: <b>01/16/2023</b>
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## I. Scope

This Standard Operating Procedure (SOP) applies to all ConocoPhillips Alaska (COPA) and contract personnel with work activities that require the use of water, ice, or snow on the North Slope.

The following attachments are included as part of this SOP:

- Exhibit A – Water Withdrawal / Ice Mining Audit Form
- Exhibit B – Winter Mine Site Discharge Monitoring Form
- Exhibit C – Water/Ice Final Environmental Inspection Form

## II. Purpose

The purpose of this SOP is to describe the requirements for utilizing water sources for various COPA activities on the North Slope. This includes procedures for opening and closing surface water sources (lakes, rivers, and mine sites), obtaining hot water, and closing constructed ice features. All COPA and contract personnel are responsible for adhering to all permit stipulations and elements of this SOP.


## III. Permits

Surface water sources can have multiple permits. Water use and ice aggregate removal are authorized by the Alaska Department of Natural Resources (ADNR) Division of Mining, Land, and Water (DMLW) under Water Rights or Temporary Water Use Authorizations (TWUA). If the source is a fish-bearing waterbody, a Fish Habitat Permit must be obtained from the Alaska Department of Fish and Game. Sources in the National Petroleum Reserve-Alaska (NPR-A) also require consultation with the Bureau of Land Management (BLM).

Mine sites may also be permitted by the Alaska Department of Environmental Conservation (ADEC) Division of Water for dewatering and discharge (including ice construction) under the Alaska Pollutant Discharge Elimination System (APDES) program. Withdrawals from mine sites under the APDES program require specific monitoring and recordkeeping, which is established in the mine site Best Management Practice Plan.

## IV. Water Intake Structures

All water withdrawals must be conducted using Alaska Department of Fish and Game (ADF&G)-certified water withdrawal intake structures (i.e. fish screens). The contractor is responsible for obtaining ADF&G certification for all intake structures. The ADF&G certification stipulates all specifications for intake structures such as length, diameter, pump rate, mesh size, etc. All intake structures must be clearly labeled with a unique identifier welded on the bottom and on metal tag on top, and all screens must be maintained per ADF&G permit requirements.

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The contractor must present all fish screens for annual inspection by the Field Environmental Coordinator (FEC). If the screens are stored in a remote location, the contractor must produce photos clear and detailed enough to observe the unique identifier and assess screen integrity. The screens will be inspected for damage (torn/crushed screen, screen separated from intake ends, etc.). Any damage observed must be repaired prior to use. The intake structure must always conform to the original specifications while in use.

The contractor must maintain, and provide to the FEC, a written log documenting all inspections.


## V. Opening a Source for Water Withdrawal, Ice Mining, or Snow Removal

The procedure for opening a source for water withdrawal, ice mining, or snow removal is the same, regardless of location or intended use. Snow removal in the NPR-A is only authorized from permitted sources.

- 1) **CONTRACTOR – Identify Water/Ice/Snow Source.** The contractor will provide global positioning system (GPS) coordinates and opening request for the proposed source to the survey team at least 24 hours (or two weeks for mine sites) prior to desired use. Survey will review GPS coordinates and then forward the verified water source information and opening request to the FEC.
- 2) **FEC – Environmental Review and Opening Notification.** The FEC will review all available information to identify the following:
  - a) Active permits, expiration dates, and available volumes
  - b) Sharing/use agreements (internal and external)
  - c) Compliance requirements (sampling, visual monitoring/sheen log, grounded-ice survey, ice profiling, water surface elevations, recharge survey, etc.)
    - i) Mine sites – The FEC will verify that there is an approved APDES and Notice of Intent (NOI) for the specific site to be dewatered. Prior to opening, the FEC will coordinate initial sampling for pH, settleable solids, and turbidity, and ensure weekly sampling until closure.
- 3) **FEC – Open Water/Ice/Snow Source.** The FEC will issue an opening via email which will include, in addition to all pertinent information identified in Step 2, the following:
  - a) A copy of the water use permit(s)
  - b) Any forms required to be completed by the contractor for continuous compliance (i.e. sheen log)
  - c) If multiple permits are in effect, instructions for tracking usage on specific permits

## VI. Compliance Requirements

The contractor is responsible for closely reviewing all information in the opening email from the FEC. The contractor must track all volumes of water/ice withdrawn, as well as maintain compliance with all

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pre-use, continuous, and mine site compliance requirements as identified by the FEC and stipulated in permits.

#### A. Pre-Use Compliance Requirements

The contractor is responsible for reviewing the permit and all information provided in the source opening email from the FEC. Prior to any water/ice aggregate withdrawals, the following must be completed:

- a) A sign must be placed at the lake access road or lake entrance clearly showing the lake name/number
- b) The water use permit must be posted on site (in pumphouse or in a tube affixed to the lake sign)
- c) Grounded ice must be surveyed and staked for ice mining areas
- d) Water withdrawal intake structure
  - Verify that only ADF&G-certified structure will be used, that it has had an annual inspection by the FEC, and that documentation has been provided to the FEC
  - Verify that the pumping unit has been calibrated to flow at or below the approved rate in the ADF&G certification


#### B. Continuous Compliance Requirements.

The contractor is responsible for adhering to all permit stipulations and compliance requirements identified by the FEC. These include, but are not limited to:

- a) Check condition of fish screens any time they are pulled from the water,
- b) No fueling on lake except for water house and light plants,
- c) No equipment staging or maintenance on the lake,
- d) Duck ponds labeled with company name and equipment number, are required under water trucks, pickups, or any other equipment on the lake,
- e) Keep pumphouses clean and clear of debris and trash,
- f) Monitor ice thickness/water depth, and reposition pumphouse/pump as necessary as freezedown occurs,
- g) Turn off lights inside the pumphouse when not in use for extended periods, or cover the water hole to avoid attracting fish, and
- h) Conduct periodic audits of activities using the Water Withdrawal / Ice Mining Audit Form (Exhibit A).

#### C. Water/Ice Use Tracking

- 1) **CONTRACTOR – Daily Volume Tracking.** Once approved water withdrawal or ice mining begins, the contractor must document all volumes withdrawn (except snow removal) on a daily basis. Each water truck driver/ equipment operator must record the source and volume of all water withdrawn

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or ice aggregate loaded during each shift on a designated log sheet, and submit the information to the contractor's single point of contact (SPOC) at the end of the shift. The contractor SPOC will review each log for accuracy and submit a daily report summarizing withdrawals for the preceding day. Contact the FEC for a withdrawal tracking log template if needed.


The daily volume tracking information, after it is reviewed by the contractor SPOC, must be submitted by either: 1) emailing the water/ice use report to the FEC (or designee), or; 2) placing it on a tracking sheet in a mutually agreed upon site on the shared drive. A written report is required even if no volumes were withdrawn. Alternative reporting frequencies may be appropriate in some instances, but must be coordinated and approved by the FEC.

- 2) **FEC – Permit Limit Monitoring.** The FEC or designee will enter all withdrawal volumes provided by contractor daily reports into the COPA Water Use Database (WUD) and review against permitted volumes. As withdrawals approach total permitted volumes, administrative actions are triggered at the following thresholds:
  - a. 20% remaining volume – FEC will notify the contractor SPOC by phone and/or email. Plans to cease withdrawals or move to an alternate source should be discussed.
  - b. 10% remaining volume – FEC will notify the contractor SPOC by phone and email to *cease withdrawals*. A notification to ADNR prior to approving further withdrawal may be required.
  - c. 5% remaining volume – FEC will notify the contractor SPOC by phone and email to *cease withdrawals immediately*.

Requests to continue water withdrawals or ice mining beyond any of these thresholds will be evaluated on a case-by-case basis, and must be approved in writing by the FEC.

#### D. Water Use Reporting

- 1) **Quarterly Water Use Reporting** – FEC will be responsible for reporting the respective lake source water use to the appropriate agencies quarterly, by the 15<sup>th</sup> of the following month. The 'Water Use Report For State' in the WUD will generate a monthly report for all lakes within a specific Unit ID. The Kuparuk FEC will submit all lakes with KRU or PBU designation, the WNS FEC will submit all WNS lakes, and the ICE or D&W FEC will submit all EXPL lakes. Reports should be checked for accuracy and that no over-withdrawals or duplicate entries occurred. Reports should be submitted to ADNR-DMLW and ADFG, and BLM for lakes on BLM surface land and covered in an IAP/ROW/ROD
- 2) **Limit Reporting** – For lakes that have a 10% limit DNR flag any withdrawals within 10% of the allowable permit limits must be reported to ADNR. Over-withdrawals on all lakes must be reported as soon as possible to the appropriate agencies.

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#### E. Mine Sites

Mine sites, in addition to all compliance obligations described above in Sections VI.A-C, have the following requirements:


- 1) **CONTRACTOR – Daily Visual Monitoring.** The contractor must conduct daily visual monitoring for discharge of floating solids, visible foam, or oily wastes which may cause a film, sheen, or discoloration on the surface or floor of the waterbody or adjoining shorelines. If a sheen is observed, notify the FEC immediately. Document this daily monitoring on the Winter Mine Site Discharge Monitoring Form (i.e. sheen log) (Exhibit B) and submit to FEC weekly.
- 2) **FEC – Review Monitoring Information.** The FEC will review the sheen log submitted by the contractor and the weekly APDES sampling results. If visual observations indicate a sheen or if lab results indicate any effluent limit exceedances, withdrawal must stop immediately and ADEC must be notified. Visual sheen detection triggers total aromatic hydrocarbon (TAH) and total aqueous hydrocarbons (TAqH) testing prior to usage resuming; contact FEC for current permit requirements, analytical results, and direction based on those results.

### VII. Closing Surface Water Sources and Ice Features

Requirements for closing water/ice/snow sources and closing or transferring ice pads or ice roads are described below. Note, FEC requirements may be performed by the FEC or another designated COPA environmental representative.

#### A. Closing Water/Ice/Snow Removal Sources

- 1) **CONTRACTOR – Initiate Closure.** Upon notification that total ice/water withdrawal is within 5% of the permitted limit, or when it is no longer required for ice construction or maintenance activities, the contractor must contact the FEC to initiate the closure process. Snow removal and access maintenance must continue until the area is approved for closure.
- 2) **CONTRACTOR – Prepare Source for Final Inspection.** The contractor must remove all delineators, survey lath, and debris in and around the areas of activity. Removal of the pump house should be coordinated so that the FEC can be present, if available. When the pump house is removed the water hole should be inspected for debris. Different requirements apply to summer use lakes – contact the FEC for requirements.
- 3) **FEC – Notify Subsistence Representative.** In applicable areas, the FEC will notify the Kuukpiik Subsistence Oversight Panel (KSOP) Subsistence Representative (SubRep) of the closure, so that they may participate in the final inspection.

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- 4) **CONTRACTOR & FEC – Final Inspection and Closure Documentation.** The contractor, FEC, and KSOP SubRep<sup>1</sup> will do a final inspection of the area. The contractor will address any action items identified during the site inspection, to the satisfaction of the inspectors. The FEC will complete a Water/Ice Environmental Inspection Form (Exhibit C), to be signed by the contractor supervisor, FEC, and KSOP SubRep (if available). The closure form must be filed by the FEC and a copy provided to KSOP upon request.
- 5) **CONTRACTOR – Block Access.** Upon closure, the contractor must immediately place a snow berm at the source entrance or access road.

#### B. Closing or Transferring Ice Pads or Ice Roads

When an ice pad or ice road is no longer required at the end of the ice road season, or if ownership of the ice pad/road is to be transferred to another group or external entity, it must undergo a formal closure. Formal closures are intended only for significant ice pads/roads – those larger pads/roads with significant use and the highest potential for contamination due to equipment activity, storage, staging, camps, projects, etc. Small pullouts, turnarounds, access roads, etc. are not required to undergo a formal closure.


The closure/transfer process for ice pads/roads is the same as for closing a water/ice/snow source (Section VII.A.); however, the contractor must also tight blade the ice pad before final inspection. The tight blading should pile material as far as possible from waterbodies to facilitate inspection and cleanup during the summer.

## VIII. Contact Information

All water withdrawals, ice mining, and snow removal from surface water sources must be coordinated with the FEC:

Field Environmental Coordinator	Phone	Email (@conocophillips.com)
Alpine Operations	670-4200	n1838
Kuparuk – Waste, Land, and Other	659-7212	n1438
WNS Drilling, Wells, & Capital Projects	670-4943	n1662
WNS Ice Roads	659-7217	alp2216
Sarah Kenshalo (CPAI Water SME)	265-1550	sarah.m.kenshalo

<sup>1</sup> KSOP SubReps typically only on projects on the WNS. If SubReps not associated with ice project, or not available at time of closeout this position can be omitted.

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Agency Contacts	Phone	Email
DNR-DMLW		<a href="mailto:Dnr.water.reports@alaska.gov">Dnr.water.reports@alaska.gov</a>
Jessica Miller (ADNR)	659-7212	<a href="mailto:Jessica.miller@alaska.gov">Jessica.miller@alaska.gov</a>
Henry Brooks (ADNR)		<a href="mailto:Henry.brooks@alaska.gov">Henry.brooks@alaska.gov</a>
Maria Wessel (ADFG)		<a href="mailto:maria.wessel@alaska.gov">maria.wessel@alaska.gov</a>
Donna Wixon (BLM)		<a href="mailto:dwixon@BLM.gov">dwixon@BLM.gov</a>
BLM Permitting Dist.		<a href="mailto:blm_ak_arctic_permitting@blm.gov">blm_ak_arctic_permitting@blm.gov</a>