

**Surveillance Plan
For
Air Permitting Exclusion Zones
ConocoPhillips Alaska, Inc. (CPAI)
Pioneer 1 and Grandview 1 East Exploration Drill Sites**

Background:

Alaska Department of Environmental Conservation (ADEC) Air Quality regulations for exploration drilling operations proposing to use 18 AAC 50.390 (minor general permit 1) for North Slope onshore winter exploration drilling operations require the preparation and submission of a surveillance plan associated with the air exclusion zones to be utilized by CPAI for its winter exploration drilling operations.

General Information:

In accordance with 18 AAC 50.390(c), the following information is provided:

Legal Authority to Exclude General Public: CPAI has the legal authority to keep the general public from entering the exploration drilling area. CPAI will request authorization from the BLM (the landowner in the Pioneer 1 and Grandview East 1 prospect areas) to establish exclusion zones that extend 30 meters from the edge of the drilling ice pad.

Identification of Site-Specific Physical Barriers to Entry: All 2008/2009 winter exploration drilling at the Pioneer 1 and Grandview 1 East locations will be accessed by ice roads constructed from the Colville River Unit and within the NPR-A NE. The Alpine oilfield is accessible by air via a private airstrip. Ice road access to exploration drilling locations is monitored and controlled by CPAI and its contractors. However, residents from Nuiqsut may utilize CPAI ice roads for access and subsistence purposes. Additionally, Nuiqsut (and other North Slope village) residents could access exploration drilling locations via snowmachines or other similar equipment. For these reasons, CPAI proposes to perform the following actions:

- A) Post the area with lighted or reflective signs printed in English and Inupiat with indicate "*Restricted Access; Air Quality Exclusion Zones; Authorized Personnel Only; Please Check-in with Drilling Manager*". Signs will be placed on the ice road leading to the well pad, and at least one on each side of the pad at the ambient air boundary.
- B) Maintain surveillance over the area sufficient to ensure that the public is excluded. CPAI and its contractors will utilize the attached surveillance monitoring form to document its activities for excluding the general public from the Pioneer 1 and Grandview 1 East drilling locations.

Proposed Sign Construction and Placement:

CPAI proposes to utilize signs that are either lighted or have been constructed of reflective material. These signs will be the same ones used in previous years.

A minimum of one sign will be placed at the edge of the exclusion zone on each side of the drilling pad. If necessary for visibility purposes, an additional sign will be placed at

the edge of the exclusion zone adjacent to the ice road leading to the exploration drilling site.

Surveillance Plan Personnel:

For all 2008-09 North Slope winter exploration drilling operations on private land, CPAI will utilize the forklift driver, roustabout crews, and/or technicians from Alaska Clean Seas (or designee specified by the on-site Drilling Manager) to perform surveillance duties.

Additionally, for all CPAI 2008-09 winter exploration drilling operations on private land, all on-site personnel will be informed of the air permitting requirements to maintain an exclusion zone at the location. All personnel will be asked to observe the location perimeter as they conduct their regular duties. Any suspected violation of the exclusion zone by unauthorized personnel shall be immediately reported to the surveillance monitoring individual by the observing party.

Proposed Surveillance Actions:

The designated surveillance personnel will be required to patrol the area between the pad edge and the edge of the exclusion zone at a frequency of at least every four hours or 6 times daily, weather permitting. The surveillance personnel will log the time and date of the location patrol. These logs will be recorded on the attached form. These completed forms will be maintained on location in the CPAI rig supervisor's office or in another on-site location designated by the CPAI rig supervisor.

If the surveillance individual encounters unauthorized personnel in the air exclusion zone, the following steps will be taken by that individual:

- 1) Approach the unauthorized person (or persons) and request that they leave the exclusion zone area immediately.
- 2) If the unauthorized individual(s) refuse to leave the exclusion zone area after the above request, they will be informed that they are subjecting themselves to an area where national ambient air quality standards may not be met and that State regulations require CPAI to restrict entry to the posted area to authorized personnel only. The unauthorized person or persons will again be asked to leave the area.
- 3) If the unauthorized individual(s) still refuse to leave, they will be informed that neither CPAI or and State agency will be liable or responsible for any harm they may encounter by being in a restricted entry area. The surveillance individual will also request the name or names of the unauthorized personnel at that time. The surveillance individual will then log the encounter with the unauthorized person or persons on the surveillance form. The data to be logged in such a situation will include:
 - a. The name of the individual (if known or otherwise provided),
 - b. The method of entry into the exclusion zone (e.g. by foot, snowmachine, etc.)
 - c. Duration of the unauthorized presence within the exclusion zone
 - d. Other pertinent information as appropriate.

The surveillance individual will also report such incidents to the CPAI rig supervisor or their designated alternate for such purpose at the next available opportunity.

- 4) If unauthorized personnel entry into the exclusion zone poses safety concerns due to operational activities (e.g. the person or persons are approaching the test flare during operation, etc.), the CPAI rig supervisor shall immediately be contacted by the surveillance individual. Actions will then be taken as deemed appropriate by the CPAI rig supervisor.
- 5) CPAI will include summary information regarding any exclusion zone violations in the facility operation report.
- 6) The completed surveillance forms will be maintained on location until completion of the operation. At that time, all completed forms should be sent to the CPAI's Exploration Environmental Compliance Coordinators (ph. 907-659-7217) for maintenance. All completed forms will be maintained for a period of five years after the start of exploration drilling operations unless otherwise requested by the ADEC.

**Air Exclusion Zone
Surveillance Monitoring Form**

(please insert data on form for each calendar day of operations)

DATE Range : _____

Pad Surveillance	Surveillance done by	Comments
<u>Trip # , Date&Time</u>		

NOTE: Pad surveillance must be performed at least every four (4) hours or six (6) times daily during operations, weather permitting.