March 20, 2003

Mr. Theodore Rockwell U.S. Environmental Protection Agency Alaska Operations Office 222 W. 7th Avenue #19 Anchorage, Alaska 99513-7588

Subject: Soils underlying Pads and Vertical Support Members (RFI Nos. 20 and 34) ExxonMobil Development Company Point Thomson Gas Cycling Project

Dear Mr. Rockwell:

ExxonMobil Development Company (ExxonMobil) is pleased to provide responses to two questions raised by the EPA and the EIS Contractor (CH2M Hill) in support of the proposed Point Thomson Gas Cycling Project. The following pages address the request for information (RFI) regarding the treatment of vertical support members (VSM) during abandonment, and soils information under the proposed pad locations in support of shoreline erosion analyses.

In addition to the attached hardcopy report, an electronic copy of this transmittal will be provided to CH2M Hill. This letter addresses RFI Nos. 20 and 34 as presented in the CH2M Hill memorandum dated February 4, 2003.

Sincerely,

Larry D. Harms Regulatory Manager

Attachment

cc: Al Maki, ExxonMobil Randy Buckley, ExxonMobil Gar Carothers, CH2M Hill Dick LeFebvre, ADNR

#### Point Thomson Gas Cycling Project Response to EIS Data Information Needs

# <u>Item 20</u>: Information of soils underlying facility footprints sufficient to assess settlement potential associated with use of ice-rich gravel.

### Level of Detail: Soil assessment and classification.

After further clarification from CH2MHill they were interested in acquiring soil boring information at each of the three pads being proposed in Draft Rev. B of the Project Description. This information would be used by CH2MHill to assist in the prediction of shoreline erosion rates.

Soil boring information for each of the pads is not available at this time. Shoreline erosion is being studied by the use of aerial photographs. A study report will be provided once it is completed as a response to EIS RFI ID #30.

#### Point Thomson Gas Cycling Project Response to EIS Data Information Needs

# <u>Item 34</u>: How "jacking" of [Vertical Support Members] VSMs and module piles will be avoided after abandonment.

#### Level of Detail: Brief white paper.

VSMs and module piles will be installed in accordance with specifications and construction practices similar to those developed on other North Slope projects.

Jacking of VSMs or module piles may jack after they are cut off at or below grade.

At the time the abandonment of facilities is conducted a specific plan will be developed for VSMs and module piles. There are several options for abandonment of VSM or module piles available at this time but there may be new techniques or uses for the VSMs available 30 years from now that may prove better and/or cost effective. For that reason it is preferred to define the method of abandonment at that time.