

Environmental Assessment
Transport and Storage of Equipment and Materials for Camp Lonely
DOI-BLM-AK-F010-2013-0015-EA

Chapter 1

1.1 Introduction

Husky Oil Operations Limited (Husky) has applied for a right-of-way (ROW) to use the former Point Lonely Distant Early Warning Line (DEW-Line) Site (Point Lonely) to aid in the clean-up of Camp Lonely. These sites are within the boundary of the National Petroleum Reserve in Alaska (NPR-A), approximately 75 miles northwest of Nuiqsut and 85 miles southeast of Barrow (Sections 16-18, 20-21 of Township 18N, Range 5W, Umiat Meridian). The proposed action involves the storage of materials (including 4,000 gallons of fuel) at Point Lonely from 2013 through 2020, and access from Deadhorse or the 2P staging area (not on BLM land) to Point Lonely via ice road during future winter operational seasons. It also involves a temporary 5,700-foot water supply line from a nearby lake, along the Point Lonely access road and then across the tundra to the Camp Lonely Pad.

1.1.1. Title:

Transport and Storage of Equipment and Materials for Camp Lonely

1.1.2. Address:

Arctic Field Office
Bureau of Land Management
1150 University Avenue
Fairbanks, Alaska 99712

1.1.3. Serial/case file number: FF096586

1.2.Applicant:

Husky Oil Operations Limited
Authorized Agent – SLR
2700 Gambell Street, Suite 200
Anchorage, Alaska 99503

1.3.Purpose and Need

The purpose of the proposed action is to allow the applicant to transport equipment and materials across BLM land to Point Lonely, store this equipment and materials until they can be used for environmental clean-up, and transport materials to Camp Lonely.

The need for the action is established by the Record of Decision for the NPR-A Integrated Activity Plan (February 2013), which outlines management for BLM lands in the NPR-A. Among the major decisions are stipulations and best management practices designed to allow

a variety of activities in NPR-A while mitigating impacts. Clean-up of the former DEW-Line site at Camp Lonely will require transport of equipment and materials to the vicinity of Point Lonely/Camp Lonely. If these actions were not permitted then the applicant could not carry out its operations and environmental degradation would occur.

1.4. Decision to be Made

The BLM will decide whether or not to grant access for transport to Point Lonely, storage of equipment and materials at Point Lonely and travel from Point Lonely to Camp Lonely. If access is granted then BLM will provide the terms and conditions of the right-of-way.

1.5. Scoping, Public Involvement and Issues

Public notification of the environmental analysis was announced on March 28, 2013 in the NEPA Register on file at the Arctic Field Office Environmental Assessment web site https://www.blm.gov/epl-front-office/eplanning/nepa/nepa_register.do

No public comments have been received through May 24, 2013. Development of the recent planning documents in NPR-A involved extensive input from other Federal agencies, the State, the North Slope Borough (NSB), thousands of individuals, and many institutions (BLM 2013). BLM guidelines include a list of issues that are addressed, where applicable, in NEPA environmental assessments. Some elements are not present in the project area and are, therefore, not discussed further. Other elements may be minimally impacted, but have been thoroughly analyzed in the NPR-A IAP/EIS (2013) that this EA tiers to, and are therefore not addressed in this document. A listing of issues considered by the Arctic Field Office (AFO) Field Staff is provided in Table 1.1.

Table 1.1. Issues Considered in Evaluation Impacts

Resources/Environmental Considerations for Issues and Analysis	Determination	Basis of Determination (See Note)
ACEC's	Not Present	
Air Quality	Minimally impacted	Protection provided by: permit stipulations II.A.
Cultural and Paleontological Resources	Minimally Impacted	Protection provided by: permit stipulations V.A and B.

Resources/Environmental Considerations for Issues and Analysis	Determination	Basis of Determination (See Note)
Environmental Justice	Not Present	
Fish	Minimally Impacted	Protection provided by: Permit stipulations II, VIII, and XI.
Flood Plains/Wetlands and Riparian Zones	Minimally impacted	Protection provided by: permit stipulations X.A-C.
Invasive, Non-native species	Minimally impacted	Protection provided by: permit stipulation X.C.
Native American Religious Concerns	Not Present	
Recreation	Minimally Impacted	Protection provided by: permit stipulations II A, IIB,IIIA, IIIC, IIIE, IIIF, IIIG, VIIA, VIIC, VIIG, VIIIA, XA,XI AND XII.
Sociocultural Systems	Not Present	
Subsistence	Minimally Impacted	Protection provided by: ANILCA, permit stipulations IIID, IXA, IXB.
Threatened & Endangered Species Spectacled and Steller's	Minimally impacted	Protection provided by: ESA Consultation and associated Terms and Conditions, Project Specific Stipulations 1-5, Permit Stipulations XI.B1 &B2; XII.A, B, C and the Wildlife Interaction and Avoidance Plan submitted to BLM by Husky Oil Operations Limited.
Threatened &	Minimally	Protection provided by: ESA Consultation

Resources/Environmental Considerations for Issues and Analysis	Determination	Basis of Determination (See Note)
Endangered Species Polar Bear	impacted	and associated Terms and Conditions, Project Specific Stipulations 1-5, Permit Stipulations XI.B1 &B2; XII.A, B, C and H and the Wildlife Interaction and Avoidance Plan submitted to BLM by Husky Oil Operations Limited.
Non threatened and endangered birds	Minimally impacted	Protection provided by: Permit Stipulations XI.B1 & B2; XII.A, B, C and the Wildlife Interaction and Avoidance Plan submitted to BLM by Husky Oil Operations Limited.
Non threatened and endangered mammals	Minimally impacted	Protection provided by: permit stipulations III.A, III.E-G, and XII.A-B, XII G-I.
Vegetation	Minimally impacted	Protection provided by: permit stipulations X.A-C and project specific stipulations 6 – 11..
Visual Resource Management	Minimally impacted	Protection provided by: permit stipulations II A, IIB,IIIA, IIIC, IIIE, IIIF, IIIG, VIIA, VIIC, VIIG, VIIIA, XA,XI AND XII, and project specific stipulations 6-11.
Water Resources	Not Present	
Waste (Hazardous/Solid)	Minimally impacted	Protection provided by: permit stipulations in Section XI.
Wild & Scenic Rivers	Not Present	
Wilderness Characteristics	Minimally impacted	Protection provided by: permit stipulations IIIC, IIIE, IIIF, IIIG, VIIG, VIIIA, XA, and

Resources/Environmental Considerations for Issues and Analysis	Determination	Basis of Determination (See Note)
and Wild Lands		XI, and project specific stipulations 6-11.
<p>Potentially Affected: The proposed action or alternative could result in potential impacts to resource or issues to the level that additional mitigation may be required, or there is a need to evaluate potentially significant issues.</p> <p>Minimally Impacted: Resources or issues would not be affected to a degree requiring further analysis because either the expected impacts from the proposed action and alternative would be minimal, or standard protections (e.g., ROPs and Stipulations from overriding BLM plans or other legal protections) would reduce impacts. Minimally impacted resources or issues will not be analyzed further in this EA.</p> <p>Not Present: Resources or issues are not expected to be affected by the proposed action or alternatives because activities would occur at a different time or place. Resource or issues not present will not be analyzed further in the EA.</p>		

In summary, BLM resource specialists have not identified issues for further evaluation in this EA. Environmental characteristics of the general project area have been extensively described in the 2012 NPR-A IAP/EIS (Vol. 1, Chapter 3), to which this analysis is tiered.

Chapter 2

2.1 Description of Proposed Action

2.2. Description of the Alternatives Analyzed in Detail

2.2.1 No Action

The no action alternative would be to deny the applicant’s request to transport and store equipment and materials to Point Lonely and onto Camp Lonely. There would be no transport of equipment and materials from Deadhorse to Point Lonely and the temporary water supply hose would not be implemented or used. This would prevent clean up at the Camp Lonely site. Although the no action alternative is not consistent with the existing management policy of the Fairbanks District Office, its analysis is required by NEPA.

2.2.2 Proposed Action

Background: Husky Oil Operations Limited (Husky) has applied for a right-of-way (ROW) to use the former Point Lonely DEW-Line Site (Point Lonely) [Sections 16, 17, 20, 21 of Township 18N, Range 5W, Umiat Meridian] to store equipment and materials and transport them for use in the clean-up of the adjacent Camp Lonely (Section 18 of Township 18N, Range 5W, Umiat Meridian) both of which are within the boundary of the NPR-A. The actual clean-up phase is part of a Resource Conservation and Recovery Act (RCRA) activity and in this EA it will only be analyzed in the Cumulative Effects section (See 4.2). The Alaska Department of Environmental Conservation (ADEC) approved the clean-up plan for Camp Lonely and the BLM is one of the parties responsible for the clean-up activity at Camp Lonely.

The planned start date is scheduled for the spring of 2013. Husky has requested the ROW be granted from May 2013 to December 2020. Year 1 on-site activities are estimated to require 70 to 90 days to complete. Peak Oilfield Services (Peak) has been contracted to bring equipment and supplies across the tundra from Deadhorse to Point Lonely (Figure 1). Peak currently has a valid NPR-A ROW which will allow them to transport these items without a new authorization. Mobilization would commence in early spring to allow a full season of on-site activities the first year and help insure completion of the excavation and barging operations in the first season. Work would mainly occur during the months of June-August, but some work may occur in the spring or fall. A temporary camp would be set up on the Camp Lonely pad for workers in 2013 and 2014 (Figure 3), this would be authorized under the existing NPR-A lease.

Transport of Equipment and Supplies to Point Lonely: The contractor would truck approximately 12 tractor-trailers of equipment and supplies to Deadhorse and transfer the loads onto seven or eight rolligons for the 120 miles of ice road or snow trail to Point Lonely.

Equipment and materials expected to be transported would include: heavy equipment (excavators, dump trucks, loaders, and vehicles); lubricants, parts and supplies; supplies and materials for handling of contaminated soil; supplies and materials for handling and storage of fuel and regulated materials; shipping containers and waste bins (OCS 2013). This equipment and materials would be stored temporarily at the camp pad at Point Lonely. Access to Point Lonely would initially be via Rolligon on snow trails and ice roads during winter and workers would use vehicles along established roads at Point Lonely during other times of the year (see subsection on Access and Transport from Point Lonely to Camp Lonely for additional description).

Freshwater Pumping: Freshwater would be pumped to the site via a hose over the tundra from a freshwater lake near Point Lonely (Figure 3). This lake is approximately 1 mile south of Camp Lonely and 1 mile southwest of the Point Lonely airstrip. A temporary water supply line (approximately 5,700 feet of 1-inch hose) would run from the lake to the temporary camp location (Figure 3). This hose would be set out and maintained by personnel on foot.

Access and Transport from Point Lonely to Camp Lonely: The ROW request includes access to Camp Lonely and utilization of Point Lonely as a staging area for transport of materials to Camp Lonely. Point Lonely is not connected to the Alaska road system. Overland access is possible in the winter, and sea access can occur during the summer. The ROW that the Arctic Field Office of the BLM would grant would cover access from Point Lonely, and to Camp Lonely, and the equipment and material would be stored and staged at Point Lonely (Figure 4).

The applicant has requested to use the beach to access Camp Lonely from Point Lonely. However, there are indications that portions of beach have eroded and would be inaccessible for vehicle use during the summer (SLR and Olgoonik 2013). The applicant has requested a contingency plan for access between Point Lonely and Camp Lonely. If the equipment can be transported along the beach from Point Lonely to Camp Lonely they will use the beach route. If (or when) the beach is not accessible, a 1,300 foot section of tundra (see Figure 4) would be used by low ground pressure vehicles (Argo 8X8 Avenger 750 HDI with Supertracks) to connect the available sections of beach. The applicant anticipates four to six round trips per week over the tundra during times the beach is not accessible by vehicles (up to 40 to 80 round trips over the summer season).

Fuel Storage: The maximum diesel fuel to be stored on site is 6,000 gallons which would be distributed between Pt. Lonely and Camp Lonely depending upon the stage of the transfer process between the two sites. The maximum aviation Gas to be stored on site is ten 550 gallon drums at Point Lonely. There could be up to four 55 gallon drums of gasoline at Point Lonely or Camp Lonely. Spill contingency plans include keeping all 55 gallon drums stored within a diked secondary containment berm in close proximity to the ISO tank at the Point Lonely Airstrip. The drums would be visibly marked with high visibility markings showing the contents. The empty drums would be transported back to Fairbanks via Everts Air Fuel and returned full to support the next refueling event. During filling operations, drums would be placed in secondary containment “duck ponds” to catch any possible spills. In the event a spill does occur, OSC would have onsite fuel absorbant pads, sorbent boom/socks, assorted handtools, safety PPE for personnel, waste disposal bags, and an empty drum for containing wastes. All fuel transfers would occur with no less than 2 trained personnel present at all times.

Fuel Transport and Handling: Approximately one fuel delivery every 7 to 14 days would occur, depending on site operations and needs. During the early season fuel (approximately 4,200 gallons per delivery) will be flown to Point Lonely airstrip. If the beach route is accessible the fuel would be transported between Point Lonely and Camp Lonely in a 1,000 gallon tank using a loader. If the beach route is not accessible an R-44 helicopter (acquired either from Barrow, Fairbanks, or Deadhorse) would be used to transport fuel in 55 gallon drums (two drums per trip). At Camp Lonely the drummed fuel would be transferred to a 1,000 gallon tank. Transfer and storage of fuel will occur within secondary containment. If the helicopter option is used, for each weekly fueling event approximately 38 round trips of the helicopter would be required and this activity would take one day or two partial days each week it was necessary. If the beach

route is not passable the helicopter would be used on approximately seven occasions (SLR International and OCS 2013), requiring a maximum of 196 take offs and landings

After August 1 the fuel will be delivered by a barge, and the beach route or helicopter transport would not be used. After the barging of waste commences fuel will be brought to the Camp Lonely site from Prudhoe Bay. This fuel would be delivered in a 2,800 gallon (approximately) tank that will be fastened to a truck and transported on the barge. If needed planking or steel ramps may be placed between the barge and the beach for loading and unloading. Rig mats or planking would also be placed on the beach for support on areas with soft sand.



Figure 1. Proposed winter access route

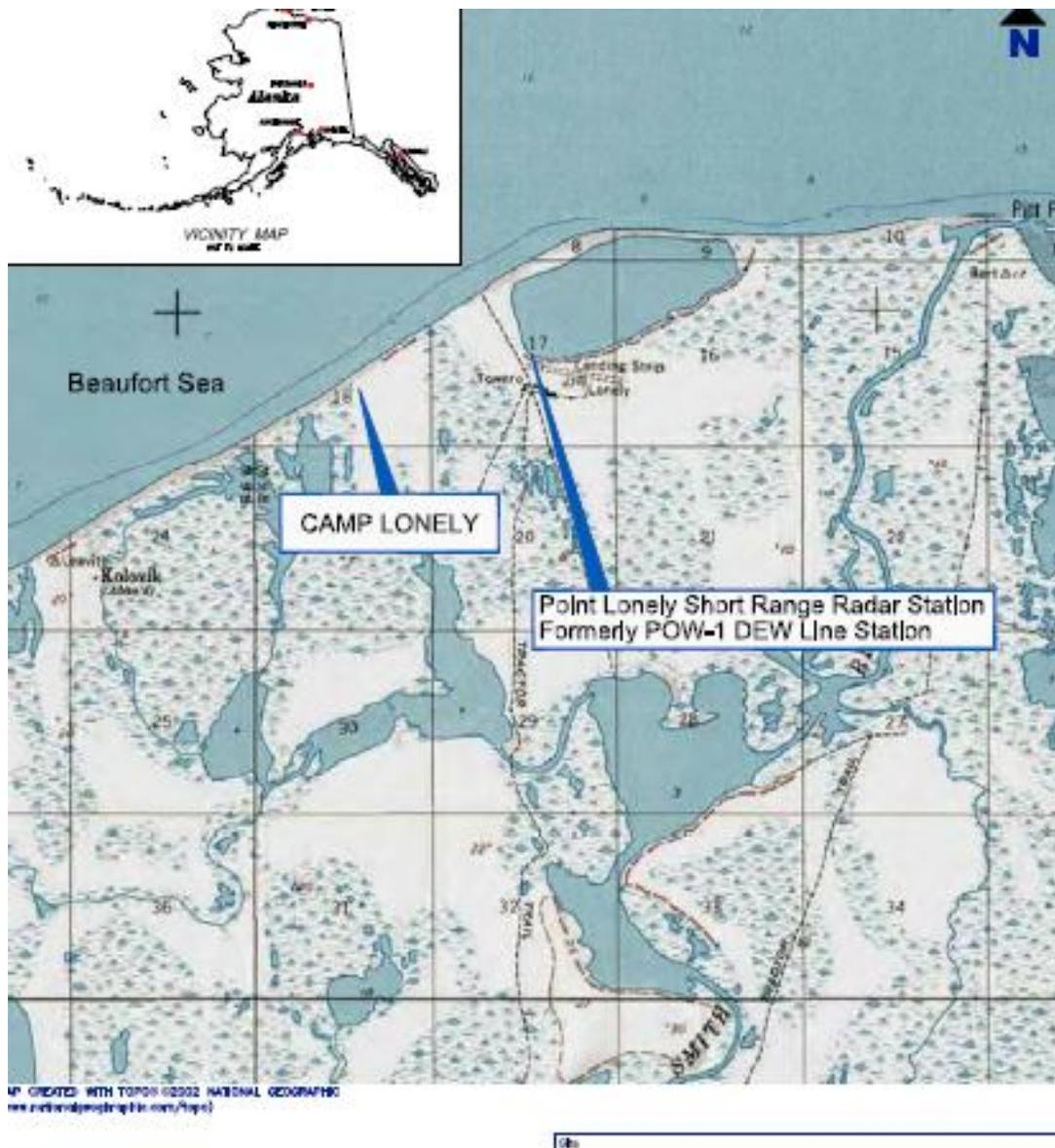


Figure 2. Location of Camp Lonely and Point Lonely



Figure 3. Map of Camp Point Lonely and Camp Lonely showing temporary water supply line.

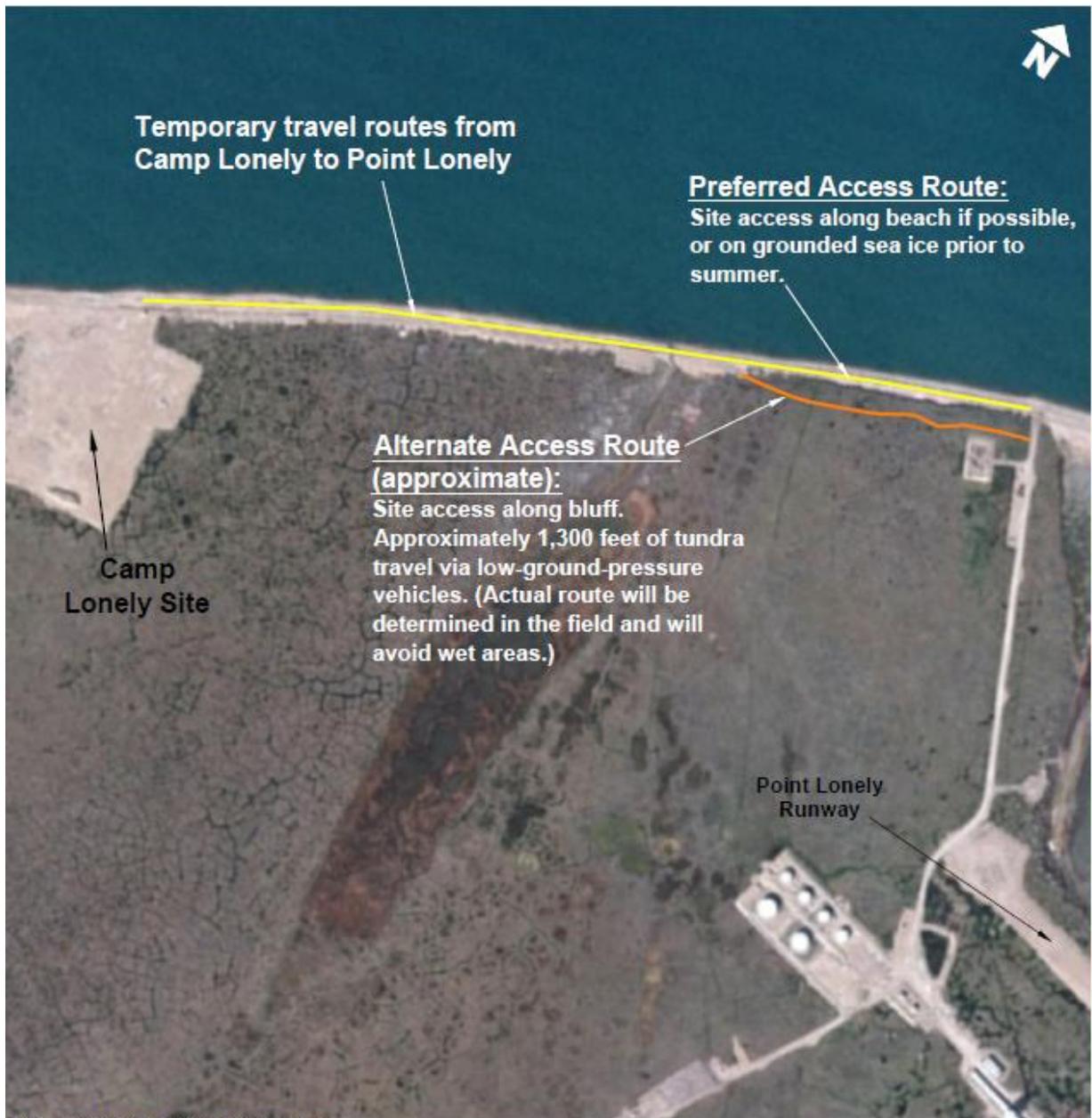


PHOTO: GOOGLE EARTH ©IMAGERY DATE 7/13/2009.

SCALE: 1" = 600 FEET
 WHEN PLOTTED AT 8.5 x 11 PAGE SIZE
 0 600' 1,200' 1,800'

THIS DRAWING IS FOR CONCEPTUAL PURPOSES ONLY. ACTUAL LOCATIONS MAY VARY AND NOT ALL STRUCTURES ARE SHOWN.

Site		
CAMP LONELY, ALASKA		
Report		
CLEANUP PLAN FOR LANDFILLS AND ASSOCIATED PAD		
Drawing		
COASTAL TRAVEL ROUTES		
Date	Scale	Fig. No.
April 29, 2013	AS SHOWN	
File Name: L Fig 2 & 2B Site Map_4-10-13	Project No.	2B
	105.00617.00005	

Figure 4. Aerial view of Point Lonely and Camp Lonely sites, the water supply line, and proposed local access routes

2.3 Alternatives Considered but not Analyzed in Detail

2.3.1 Transport All Equipment and Materials by Air or Sea

Boat travel between Point Lonely and Camp Lonely was deemed to pose a greater risk to human life and create a potential for a fuel spill into marine waters. In addition, boat travel would be restricted by sea ice, especially in the early season (until late July). Transport by hovercraft was also considered but this mode of transport would result in increased risk to personnel and a hovercraft would create greater noise levels that could affect wildlife.

2.3.2 Store Equipment and Materials at Another Site

Storing equipment and materials elsewhere would not be desirable, because it would still require transport to a more distant location and the potential for even greater environmental disturbance. To meet the purpose and need of this project, the clean-up work at Camp Lonely would still need to be conducted.

2.4 Conformance

The proposed action is in conformance with the NPR-A IAP/EIS (2012) and ROD (2013), Naval Petroleum Reserves Production Act (NPRPA), Federal Land Policy Management Act (FLPMA), Alaska National Interest Lands Conservation Act (ANILCA), and the Endangered Species Act (ESA).

In the NPR-A IAP/EIS 2012, the BLM evaluated the direct, indirect, and cumulative effects of overland moves and other land use permits. The analysis may be found under respective sections titled Activities Not Associated with Oil and Gas Exploration and Development. Those analyses concluded that the stipulations and BMPs provided adequate protection for surface resources and subsistence activities in the NPR-A.

Chapter 3 Affected Environment

3.1 Scope of Analysis

Details of the environmental characteristics of the general project area have been extensively described in the documents listed below, to which this analysis is tiered:

- National Petroleum Reserve-Alaska, Supplemental Integrated Activity Plan/Environmental Impact Statement (2012) and Record of Decision, February, 2013

Review of the proposed project for potential issues (Section 1.5) indicated no or minimal impacts to air quality, cultural and paleontological resources, fish Flood Plains/Wetlands and Riparian Zones Native American Religious Concerns, Recreation, subsistence, non

threatened/endangered birds and mammals, vegetation, visual resource management, water resources, or waste management (See Table 1.1 for complete list of issues considered).

Chapter 4 Environmental Effects

4.1 Direct and Indirect Impacts

BLM resource specialists have not identified issues for further evaluation in this EA. Review of the proposed project for potential issues (Section 1.5) indicated no or minimal impacts to air quality, cultural and paleontological resources, fish, flood plains/wetlands/riparian zones, Native American religious concerns, recreation, subsistence, non-threatened-endangered birds and mammals, vegetation, visual resource management, water resources, or waste management (See Table 1.1 for complete list of issues considered).

4.2. Cumulative Effects

Cumulative impacts result from the incremental addition of past, present, and reasonably foreseeable actions. Each individual action may have minor effects, but when added to others the effects could become significant over a period of time. The cumulative effects of oil and gas development and non-oil and gas activities (i.e., North Slope development, development and clean-up of military sites and former DEW-Line stations, aircraft use, watercraft use, excavation and collection of surface and subsurface materials [gravel, archaeological, paleontological, and geological resources], overland moves, waste removal, film permits and recreation, and research and monitoring) for the NPR-A, including Point Lonely, were analyzed in the NPR-A IAP/EIS (Section 4.8). The geographic scope for the current action includes the access route from Deadhorse to Point Lonely and between Point Lonely and Camp Lonely and time frame would be from when the site was established (1950s) to approximately 10 years after the project has been completed (2030).

Removal actions of materials and any contaminated soils are expected to occur occur in 2014 This would be followed by one or two years of land-farming at the Camp Lonely site. Annual monitoring consisting of a one to two day site visit will occur for approximately 5 years after the removal action is completed.

According to the Scope of Work, the clean-up plan would consist of four primary steps (SLR 2012): (1) Excavation of contaminated soil above site-specific clean-up levels and excavation of solid waste; (2) Offsite disposal of solid waste and quantities of hazardous substances previously identified or assumed to be present that are not suitable for onsite treatment by land-farming; (3) Onsite land-farming of petroleum contaminated soil (PCS) to reduce concentrations below clean-up levels; and, (4) Post-closure (clean-up) surface water monitoring.

Clean-up activities would include the excavation of buried solid waste within two landfill areas and excavation of other areas on the pad containing PCS. Solid waste and contaminated soil will be segregated. Solid waste will be shipped offsite for disposal. The PCS at the site is

predominantly sandy gravel in texture. It will be treated on the existing pad through land-farming. Land-farming will consist of spreading the soil on the interior portion of the pad approximately 1.0 to 1.5 feet thick and tilling it periodically to promote biodegradation of the petroleum hydrocarbons. All work is anticipated to occur within the boundaries of the existing pad. The Clean-up Plan covers the removal actions and land-farming portions of the project. The post removal action Monitoring Plan will be submitted separately. Other plans to be prepared under separate cover include a Site Operations Plan, which will cover camp operations, mobilization and demobilization activities, and a Health and Safety Plan.

4.3 Mitigation and Monitoring

4.3.1 Project Specific Stipulations

1. The helicopter conducting the refueling operation must fly a straight line route between Point Lonely and Camp Lonely.
2. The same route should be followed on each trip.
3. The helicopter shall fly the route at 200 feet agl.
4. The shortest safe sling set-up (length of line plus full stretched net) should be used and the same set-up should be used on all trips.
5. A track log of all flight must be made and given to BLM within 30 days of completion of work. The track log must record locations at a frequency of 10 seconds or less. The track log shall be given to BLM in Garmin GPS Database (.gbd) format.

The following ADNR general stipulations for summer tundra travel by low-ground-pressure vehicles will apply to the project (ADNR 2013):

- Operations shall be restricted to dry uplands whenever possible.
- The crossing of wetlands shall be kept to an absolute minimum.
- The crossing of ponds, lakes, or the wetlands immediately bordering these areas is not authorized.
- Minimum radius turns shall be avoided where possible.
- All operators shall be made familiar with arctic vegetation types to ensure compliance with the above.

The Argo operators will be informed of these stipulations and also be required to maintain a low travel speed (< 5 mph) when operating on the tundra route.

4.3.2 Monitoring and Restoration

After the general travel route is selected and staked, the ground surface over the planned route will be photographed for documentation purposes. After the route is put into service, it will be inspected by the SLR environmental scientist or the OSC Quality Control Supervisor on a weekly basis to determine if any negative impact to the tundra is occurring which can be minimized or eliminated by modifying practices. Corrective actions will be taken as deemed appropriate, in consultation with the BLM. Mitigation measures to reduce the number of trips will be considered if negative impacts are observed. At the end of the 2013 travel season the ground surface in the travel route area will be photographed for documentation purposes. The

area will also be inspected to evaluate if any reseedling or other restoration measures would be worthwhile and effective. This evaluation will be done by Husky in coordination with the BLM based on a review of the photography, site inspections and likelihood the impacted areas will erode in the near future. If deemed appropriate, a restoration plan would be developed over the winter season and implemented the following field season.

4.3.3 Non-Oil and Gas Stipulations (see attached Stipulations and Best Management Practices in Appendix A)

4.4 Summary of Environmental Consequences

There were no potential issues identified in this EA further evaluation due to the proposed action (see Table 1.1). The valued environmental components included:

- ACEC's
- Air Quality
- Cultural and Paleontological Resources
- Environmental Justice
- Fish
- Flood Plains/Wetlands and Riparian Zones
- Invasive, Non-native species
- Native American Religious Concerns
- Recreation
- Sociocultural Systems
- Subsistence
- Threatened & Endangered Species Spectacled and Steller's
- Threatened & Endangered Species Polar Bear
- Non threatened and endangered birds
- Non threatened and endangered mammals
- Vegetation
- Visual Resource Management
- Water Resources
- Waste (Hazardous/Solid)
- Wild & Scenic Rivers
- Wilderness Characteristics and Wild Lands

The screening analysis by the interdisciplinary team found that impacts would be short term and localized and that project-specific and standard mitigation measures listed in Appendix A, would prevent potential significant environmental impacts. The proposed action would not contribute to significant adverse direct, indirect or cumulative effects to resources in the proposed project area.

Chapter 5 Tribes, Individuals, Organizations, or Agencies Consulted

Public notification of the environmental analysis was announced on March 28, 2013 in the NEPA Register on file at the Arctic Field Office Environmental Assessment web site https://www.blm.gov/epl-front-office/eplanning/nepa/nepa_register.do

ANILCA REQUIREMENTS

Section 810 Subsistence Evaluation

This action is not likely to cause any significant restriction to the subsistence resources of the area (see ANILCA section 810 Evaluation within the ROW case file).

Chapter 6 List of Preparers

Dave Yokel, Wildlife Biologist
Susan Flora, Environmental Scientist
Richard Kemnitz, Hydrologist
Donna Wixon, Natural Resource Specialist
Debbie Nigro, Wildlife Biologist
Matthew Whitman, Fish Biologist
Stacey Fritz, Anthropologist/Subsistence Specialist
Roger Sayre, NEPA Specialist
Stacie McIntosh, Resources Supervisor

Chapter 7 Bibliography

OCS (Olgoonik Specialty Contractors) 2013. CAL 12-5293 Camp Lonely Cleanup. Site Operations Plan. Olgoonik Specialty Contractors, 3201 C Street Suite 700, Anchorage, AK 99513.

SLR International and Olgoonik Specialty Contractors (OCS) 2013. Site Operations Plan Addendum for Alternative Coastal Travel Route (Between Point Lonely and Camp Lonely) Camp Lonely Cleanup, Alaska. Revision 1.

FF096586 Husky Right of Way Stipulations

Project Specific Stipulations:

1. The helicopter conducting the refueling operation must fly a straight line route between Point Lonely and Camp Lonely.
2. The same route should be followed on each trip.
3. The helicopter shall fly the route at 200 feet agl.
4. The shortest safe sling set-up (length of line plus full stretched net) should be used and the same set-up should be used on all trips.
5. A track log of all flight must be made and given to BLM within 30 days of completion of work. The track log must record locations at a frequency of 10 seconds or less. The track log shall be given to BLM in Garmin GPS Database (.gbd) format.
6. Operations shall be restricted to dry uplands whenever possible.
7. The crossing of wetlands shall be kept to an absolute minimum.
8. The crossing of ponds, lakes, or the wetlands immediately bordering these areas is not authorized.
9. Minimum radius turns shall be avoided where possible.
10. All operators shall be made familiar with arctic vegetation types to ensure compliance with the above.
11. The Argo operators will be informed of these stipulations and also be required to maintain a low travel speed (< 5 mph) when operating on the tundra route.

ARCTIC FIELD OFFICE NON OIL AND GAS PERMIT STIPULATIONS

[This is a subset of the 2013 National Petroleum Reserve-Alaska Integrated Activity Plan Record of Decision, Utility Corridor Resource Management Plan/Final Environmental Impact Statement, and the Colville River Special Area Management Plan. Stipulations and Best Management Practices from these documents along with frequently utilized resource-specific stipulations are incorporated. Special Recreation Permit holders meet most requirements by following the guidelines in Leave No Trace, Alaskan Tundra.]

I. AUTHORIZED OFFICER

The Authorized Officer (AO) is the Manager, Arctic Field Office.

II. AIR & WATER

- A. All operations shall comply with applicable Air and Water Quality Standards of the State of Alaska.
- B. Grey wash water and kitchen waste water may be filtered to remove the solids and the liquid discharged to the land surface, provided the disposal area is a minimum of 100 feet from any water body or stream.
- C. Water withdrawal from rivers and streams during winter is prohibited.
- D. Compaction of snow cover or snow removal from fish-bearing water bodies shall be prohibited except at approved ice road crossings, water pumping stations on lakes or areas of grounded ice.
- E. Lakes with sensitive fish (i.e., any fish except ninespine stickleback or Alaska blackfish): unfrozen water available for withdrawal is limited to 15% of calculated volume deeper than 7 feet; only ice aggregate may be removed from lakes that are ≤ 7 -feet deep.
- F. Lakes with only non-sensitive fish (i.e., ninespine stickleback or Alaska blackfish): unfrozen water available for withdrawal is limited to 30% of calculated volume deeper than 5 feet; only ice aggregate may be removed from lakes that are ≤ 5 .
- G. Lakes with no fish present, regardless of depth: water available for use is limited to 35% of total lake volume.
- H. In lakes where unfrozen water and ice aggregate are both removed, the total use shall not exceed the respective 15%, 30% or 35% volume calculations
- I. Additional modeling or monitoring may be required to assess water level and water quality conditions before, during and after water use from any fish-bearing lake or lake of special concern.
- J. Any water intake structures in fish bearing or non-fish bearing waters shall be designed, operated and maintained to prevent fish entrapment, entrainment, or injury. Note: All water withdrawal equipment must be equipped with and must utilize fish screening devices approved by the Alaska Department of Fish and Game, Division of Habitat.
- K. Compaction of snow cover or snow removal from fish-bearing waterbodies shall be prohibited except at approved ice-road crossings, water pumping stations on lakes, or areas of grounded ice.

III. AIRCRAFT

- A. Hazing of wildlife by aircraft is prohibited. Pursuit of running wildlife is hazing. If wildlife begins to run as an aircraft approaches, the aircraft is too close and must break away.
- C. Aircraft shall maintain a altitude of at least 1,000 ft AGL (except for takeoffs and landings) over caribou winter ranges from December 1 through May 1, unless doing so would endanger human life or violate safe flying practices. Caribou wintering areas will be defined annually by the AO.
- D. Use of aircraft, especially rotary wing aircraft, near known subsistence camps and cabins or during sensitive subsistence hunting periods (spring goose hunting and fall caribou and moose hunting) should be kept to a minimum.
- E. Aircraft used for permitted activities shall maintain a altitude of at least 2,000 feet AGL (except for takeoffs and landings) over the Teshekpuk Lake Caribou Habitat Area and the Utukok River Uplands Special Area (Map 2) from May 20 through August 20, unless doing so would endanger human life or violate safe flying practices. Aircraft use (including fixed wing and helicopter) in the Goose Molting Area (EA Map 2) should be minimized from May 20 through August 20, unless doing so would endanger human life or violate safe flying practices.
- F. Fixed wing aircraft used for permitted activities along the coast shall maintain a minimum altitude of 2,000 feet AGL when within a ½-mile of walrus haulouts, unless doing so would endanger human life or violate safe flying practices. Helicopters used for permitted activities along the coast shall maintain a minimum altitude of 3,000 feet and a 1-mile buffer from walrus haulouts, unless doing so would endanger human life or violate safe flying practices.
- G. Aircraft used for permitted activities along the coast and shore fast ice zone shall maintain a minimum altitude of 3,000 feet when within 1 mile from aggregations of seals, unless doing so would endanger human life or violate safe flying practices.

V. CULTURAL/PALEONTOLOGICAL RESOURCES

- A. In accordance with the Archaeological Resources Protection Act (16 U.S.C. 470aa), the removal or disturbance of archeological or historic artifacts is prohibited. The excavation, disturbance, collection, or purchase of historical, recent, ethnological, or archaeological specimens or artifacts is prohibited. Such items include both prehistoric stone tools and sites, as well as historic log cabins, remnants of such structures, refuse dumps, and other such features. The disturbance, excavation and collection of vertebrate paleontological (fossil) remains is also prohibited.
- B. Any cultural or Paleontological resource discovered by the holder, or any person working on his behalf, situated on lands owned or controlled by the United States shall be promptly reported to the AO. Discoveries must be left in place to allow for an examination by BLM cultural or paleontological specialists.

VI. FIRE

- A. The BLM, through the AO, reserves the right to impose closure of any area to operators in periods when fire danger or other dangers to natural resources are severe.
- B. The authorized user shall be financially responsible for any damage done by a wildfire caused by its operations. Costs associated with wildfires include but are not limited to, damage to natural resources and costs associated with any suppression action taken on the fire.

VII. OPERATIONS

- A. It is the responsibility of the authorized user to ensure that all individuals brought to the project area under its auspices adhere to these stipulations. Authorized users of the planning area shall provide all employees, contractors, subcontractors, and clients with a briefing regarding stipulations applicable to the lease and/or permit.
- B. A copy of applicable stipulations will be posted in a conspicuous place in each work site and campsite.
- C. The provisions of this permit do not relieve the Permittee of any responsibilities or obligations required by the laws or regulations of the State of Alaska Department of Fish and Game or the U.S. Fish and Wildlife Service, or other applicable regulations related to this permit
- D. The authorized user shall protect all survey monuments and be responsible for survey costs if remonumentation is required as a result of the user's actions.
- E. Survey monuments include, but are not limited to, General Land Office and Bureau of Land Management Cadastral Survey Corners, reference corners, witness points, U.S. Coast and Geodetic benchmarks and triangulation stations, military control monuments, and recognizable civil (both public and private) survey monuments.
- F. In the event of obliteration or disturbance of any of the survey monuments above, the Permittee shall promptly report the incident, in writing, to the Authorized Officer and the respective installing agency, if known. Where General Land Office or Bureau of Land Management right-of-way monuments or references are obliterated during operations, the Permittee shall secure the services of a registered land surveyor or a Bureau Cadastral surveyor to restore the disturbed monuments and references using surveying procedures found in the Manual of Surveying Instructions for the Survey of Public Lands of the United States, latest edition. If the Bureau cadastral surveyors or other Federal surveyors are used to restore the disturbed survey monuments, the Permittee shall be responsible for survey costs.

- G. Removal of greater than 100 cubic yards of bedrock outcrops, sand and/or gravel from cliffs shall be prohibited and any extraction of sand and/or gravel from an active river or stream channel shall be prohibited unless preceded by a hydrological study that indicates no potential impact by the action to the integrity of the river bluffs.

VIII. STREAMS

- A. All operations shall be conducted with due regard for good resource management and in such a manner as not to block any stream, or drainage system, or change the character or course of a stream, or cause the pollution or siltation of any stream or lake.

Winter Only

- B. Travel up and down streambeds in winter is prohibited unless it can be demonstrated that there will be no additional impacts from such travel to over-wintering fish or the invertebrates they rely on. Rivers and streams shall be crossed at areas of grounded ice whenever possible.

IX. SUBSISTENCE

- A. The permittee will take no action that interferes with subsistence activities of rural users or restricts the reasonable access of subsistence users to public lands. This may include but is not limited to disturbance of wildlife and their movements near subsistence hunters, and damage to cabins, trails, traditional campsites or caches used by subsistence users. The permittee must familiarize themselves, their team, and their pilots with any subsistence camps and cabins located near their project site (map available upon request) and, when using aircraft, make all reasonable efforts to avoid disturbing hunters.
- B. The Arctic Field Office will determine on an application-by-application basis what level of consultation will be required in order to provide adequate notification to communities, including whether the project merits application of the complete H-1 (Subsistence) Best Management Practice from the 2013 NPR-A EIS/IAP Record of Decision. Determination will be based on Arctic Field Office experience and on communication with representatives of the BLM NPR-A Subsistence Advisory Panel. Permittee will respond to questions and any reasonable requests for consultation that tribes and/or communities may have. Information on permits will be included on the NPR-A Permitted Projects spreadsheet that is distributed to tribal governments and North Slope communities. Permittee is encouraged to correspond with Arctic Field Office anthropologist/subsistence specialist if they have any questions or concerns: Stacey Fritz: (907) 474-2309, sfritz@blm.gov.

X. VEGETATION

- A. All activities shall be conducted to avoid or minimize disturbance to vegetation. The clearing of vegetation for camps or aircraft landing areas is prohibited.

B. On a case-by-case basis, BLM may permit low ground- pressure vehicles to travel off of gravel pads and roads. Permission for such use would only be granted after an applicant has:

1. Submitted studies satisfactory to the AO of the impacts on soils and vegetation of the specific low-ground-pressure vehicles to be used. These studies should reflect use of such vehicles under conditions similar to those of the route proposed for use and should demonstrate that the proposed use would have no more than minimal impacts to soils and vegetation.
2. Submitted surveys satisfactory to the AO of subsistence uses of the area as well as of the soils, vegetation, hydrology, wildlife and fish (and their habitats), paleontological and archaeological resources, and other resources as required by the AO.
3. Designed and/or modified the use proposal to minimize impacts to the AOs satisfaction. Design steps to achieve the objectives and based upon the studies and surveys may include, but not be limited to, timing restrictions (generally it is considered inadvisable to conduct tundra travel prior to August 1 to protect ground nesting birds), shifting of work to winter, rerouting, and not proceeding when certain wildlife are present or subsistence activities are occurring.

C. Certify that all equipment and vehicles (intended for use either off or on roads) are weed-free prior to transporting them into the NPR-A. Monitor annually along roads for non-native invasive species, and initiate effective weed control measures upon evidence of their introduction. Prior to operations in the NPR-A, submit a plan for the BLM's approval, detailing the methods for cleaning equipment and vehicles, monitoring for weeds and weed control.

XI. WASTE

A. HUMAN WASTES

1. Toilet paper: Toilet paper must be packed out, or a natural alternative used. Natural options for toilet paper include snow, smooth stones or sticks, leaves and moss. Natural TP options should be disposed of the same as the human waste. Feminine hygiene products and diapers must also be packed out.
2. Urine: Urine can attract animals seeking salt: avoid urinating on plants that can be defoliated by animals attracted to the salt residue. Urinate 200 feet away from camps and trails on rock, bare ground, or water sources.
3. Recommended human excreta disposal in riparian areas: Packing out human excreta is the most eco-friendly means of waste disposal and the toilet can be located wherever is most appropriate. This method helps areas that receive high-levels of use retain their naturalness, and preserves pristine areas. Disadvantages include: it incurs cost and requires logistical considerations.

The WAG (Waste Alleviation and Gelling) Bag has become the overall term for any pack-it-out bag system. It generally involves one bag with which holds the excrement and another sturdier, sealable bag. Commercial vendors of waste bag kits, powders and supplies include ReStop, Biffy Bags, and Cleanwaste.

4. Human excreta disposal at camp sites experiencing 60 person-days of use or greater in 2013: A designated pit toilet or latrine site should be developed. For a latrine site, dig a long cat hole (e.g. six feet) trench. Start excrement disposal at one end and cover up as deposits are made. Siting must be a minimum of 200 feet away from water, trails, and campsites. The bottom of the trench must be above groundwater. Alternatively, a pit toilet per Alaska Department of Environmental Conservation Water Program Guide Pit Privy Design, Operation and Closure requirements (<http://dec.alaska.gov/water/pdf/07CampApplicationWorksheet.pdf>) should be constructed, operated and then properly closed at the end of the season.

B. GARBAGE

1. Attracting wildlife to food and garbage is prohibited.
2. Areas of operation shall be left clean of all debris.

C. FUEL

1. Notice of any spill shall be given to the AO as soon as possible or to the BLM Arctic Field Office Hazmat Coordinator, Susan Flora (work/message 907-474-2303). Other Federal, State, and NSB entities shall be notified as required by law.
2. All spills shall be cleaned up immediately and to the satisfaction of the AO and all agencies with regulatory authority over spills, including the Alaska Department of Environmental Concerns (ADEC),(1800-478-9300) (Alaska Statute Title 18, Chapter 75, Article 2).
3. State and Federal safety standards for fuel handling will be followed.
4. Fuel and other petroleum products and other liquid chemicals shall be stored in proper containers at approved locations. All fuel containers, including barrels and propane tanks, shall be marked with Permittee's name, product type, and year filled or purchased (e.g. company Name, Fuel Type, 1993).
5. Sorbant pads will be stored and used at all fueling points and maintenance areas. Drip basins and/or sorbent pads will be placed under all non dry-disconnect-type fuel line couplings and valves.

6. Fuels shall not be stored on the active floodplain of any waterbody. Although fuels may be off-loaded from aircraft on ice, fuels shall not be stored on lake or river ice.
7. Refueling of equipment within 500 feet of the active floodplain of any waterbody is prohibited. Fuel storage stations shall be located at least 500 feet from any water body with the exception that small caches (up to 210 gallons) for motorboats float planes, ski planes, and small equipment, e.g. portable generators and water pumps, will be permitted.
8. Fuel, other petroleum products, and other liquid chemicals designated by the AO in **excess of 1,320 gallons** in storage capacity, shall be stored within an impermeable lined and diked area or within approved alternate storage containers such as overpacks, capable of containing 110 percent of the stored volume. The liner material shall be compatible with the stored product and capable of remaining impermeable during typical weather extremes expected throughout the storage period.

D. PESTICIDES

Use of pesticides without the specific authority of the AO is prohibited.

XII. WILDLIFE

- A. Chasing wildlife with ground vehicles is prohibited. Particular attention will be given to avoid disturbing caribou.
- B. The feeding of wildlife is prohibited and will be subject to non-compliance regulations.
- D. Marine vessels used for permitted activities shall maintain a 1-mile buffer from the shore when transiting past an aggregation of seals (primarily spotted seals) using a terrestrial haulout unless doing so would endanger human life or violate safe boating practices. Marine vessels shall not conduct ballast transfers or discharge any matter into the marine environment within 3 miles of the coast except when necessary for the safe operation of the vessel.
- G. With the exception of authorized guide hunting trips, hunting and trapping by permittee's employees, agents, and contractors are prohibited when persons are on "work status." Work status is defined as the period during which an individual is under the control and supervision of an employer. Work status is terminated when the individual's shift ends and he/she returns to a public airport or community (e.g., Fairbanks, Barrow, Nuiqsut, or Deadhorse). Use of permittee facilities, equipment, or transport for personal access or aid in hunting and trapping is prohibited.
- I. Marine vessels used for permitted activities shall maintain a 1/2-mile buffer from shore when transiting past an aggregation of walrus using a terrestrial haulout.

Finding of No Significant Impact

Type of Action: National Petroleum Reserve-Alaska Right-of-way

Serial Number: FF096586

Applicant: Husky Oil Operations Limited

District: Arctic Field Office

Planning Unit: National Petroleum Reserve-Alaska

Lands Involved: Sections 16, 17, 18, 20 & 21 of Township 18N, Range 5W, Umiat Meridian

Context and Intensity of Environmental Impacts

Based upon a review of the Environmental Assessment (EA) prepared by the Arctic Field Office and the supporting documents, I have determined that the proposed action will not have a significant effect on the quality of the human environment, individually or cumulatively with other actions in the general area. The direct, indirect, and cumulative effects, from a variety of activities including the types described in this EA, were analyzed in the NPR-A IAP/EIS (2012). The activities proposed for the current proposed action are similar in nature to those described in the NPR-A IAP/EIS (2012) [see Sections 4.2.2.1 and 4.8.2].

No environmental effects meet the definition of significance as defined at 40 CFR §1508.27. Therefore, an environmental impact statement is not required. We reviewed the context of the Proposed Action and found that it would not result in any significant effects to resources and values in the National Petroleum Reserve-Alaska (NPR-A) and surrounding lands.

The following factors were considered in the EA to evaluate the significance of this proposal (40 CFR §1508.27): Beneficial and adverse impacts; effects on public health and safety; unique cultural or ecological areas within or near the project area; potentially controversial or uncertain effects; whether the action may establish a precedent for future actions with significant effect; cumulative effects; adverse impacts to important scientific, cultural or historical resources; effects to endangered or threatened species or habitat; or whether the action threatens a violation of federal, state, local or tribal law, regulation or policy imposed for the protection of the environment, where non-federal requirements are consistent with federal requirements.

Monitoring and Mitigation

BLM will monitor on the ground activities periodically. Mitigation measures will be implemented as described in Section 4.3 and Appendix A of the EA.

Conclusion

The proposed action, as submitted by the applicant and mitigating measures reviewed in the environmental assessment (DOI-BLM-AK010-2013-0015-EA), is found to have no significant impacts on the environment and will cause no undue or unnecessary degradation to the public lands. No permanent structures or facilities will result from the proposal. The impacts from the proposed action are short term and minimal. The action is found to be in conformance with existing land use plans for the area. Cumulative impacts are evaluated in the EA and the effects of all other reasonably foreseeable past present and future activities in the area, combined with this project are not cumulatively significant. The evaluation and finding done to comply with Section 810 of ANILCA found no significant restrictions to subsistence uses or resources.

Recommendation:

It is recommended that the ROW be approved as described in the applicant's Plan of Operations. The preparation of an Environmental Impact Statement is not recommended.

The applicant shall be subject to applicable stipulations, Best Management Practices from the NPR-A IAP/EIS 2013 ROD; project specific requirements determined in the EA and the mitigating measures incorporated into the applicant's Plan of Operations.

Associated right of way will be approved under the authority of 43 CFR §2361.2.

The action is also consistent with the purposes of the Naval Petroleum Reserves Production Act of 1976 (NPRPA, P.L. 94-258).

APPROVED:

/s/Lon Kelly
Arctic Field Office Manager

May 24, 2013

Date