

**UNITED STATES DEPARTMENT OF THE INTERIOR**

**Bureau of Land Management**

Arctic District Office  
222 University Avenue  
Fairbanks, Alaska, 99709

**DECISION RECORD**

**for ConocoPhillips Seismic Exploration, Exploration Drilling, and Existing Well Plugging**

**DOI-BLM-AK-R000-2026-0002-EA**

November 26, 2025

**I. DECISION**

ConocoPhillips Alaska Inc. (CPAI) has applied to conduct a one-year program, which will include seismic exploration, exploration drilling, and well plugging on land managed by the Bureau of Land Management (BLM) within the National Petroleum Reserve in Alaska (NPR-A). The submitted applications are as follows:

- One Oil and Gas Geophysical Exploration permit request for proposed seismic exploration work
- Four Applications for Permit to Drill (APD) for four new exploration wells
- Two Notice of Intent (NOI) sundries with final reclamation plans for two wells with proposed plugging and abandonment (P&A) work
- One Right-of-Way (ROW) application for access to and between the drilling and plugging well locations that are off lease or off unit. Access for the seismic exploration program would not require its own authorization.

The BLM has completed an Environmental Assessment (EA) (DOI-BLM-AK-R000-2026-0002-EA) to evaluate potential impacts associated with the proposed action. Potential impacts to threatened and endangered species, wildlife, hazmat, fisheries and aquatic resources, water resources, soils and permafrost, vegetation, cultural and paleontological resources, subsistence, recreation, environmental justice and sociocultural were considered and evaluated in these documents and mitigated by Required Operating Procedures (ROPs) from the 2022 IAP ROD. In addition to the 2022 IAP ROD ROPs there standard stipulations and project specific mitigation measures identified through resource analyses.

**A. Mitigation Measures**

Additional mitigation identified as part of the resource analyses:

- The operator shall provide data from Ground Penetrating Radar (GPR) and/or manually drilled holes demonstrating a comparison of ice thickness between the ice airstrip and adjacent lake ice. One set of data would need to document conditions during initial construction (i.e., pre-impact) and another set of data should show conditions at the end of the season. Data should be collected at the same locations during both time periods.

## **B. Monitoring**

1. Routine monitoring of the various project components during their execution as well as after work is completed, will be performed to document and monitor any potential disturbance.
2. In addition to the summer clean-up activities and monitoring outlined by CPAI in section 2.2.15 of the EA, inspections will be performed by the BLM during winter and summer operations.
3. Inspections will be used to document and monitor potential disturbance to vegetation, soils, stream crossings, and ensure compliance with the ROP's in Appendix A, as well as the stipulations outlined in Appendix B of the EA.
4. BLM will be monitoring project areas for any potential disturbance, subsequent recovery, and for conformance with applicable ROP's and stipulations. Any noted disturbance will be logged, and sites revisited to document recovery.

## **II. COMPLIANCE AND CONFORMANCE**

The Proposed Action is in conformance with the BLM National Petroleum Reserve in Alaska (NPR-A) Integrated Activity Plan (IAP) Environmental Impact Statement (EIS) (USDOI BLM 2020) and associated Record of Decision (ROD) (USDOI BLM 2022). All appropriate standard stipulations and required operating procedures from the 2022 NPR-A IAP ROD will be followed.

Major laws pertinent to the decision include the Federal Land Policy and Management Act of 1976 (FLPMA), Alaska National Interest Lands Conservation Act (ANILCA), National Historic Preservation Act (NHPA), Endangered Species Act (ESA), Marine Mammal Protection Act (MMPA), Sustainable Fisheries Act, and Executive Orders 11988, 11990, 14153, 14154 and 14156.

## **III. PUBLIC INVOLVEMENT**

Public notification of the ConocoPhillips Seismic Exploration, Exploration Drilling, and Existing Well Plugging EA development was announced on November 10, 2025, for a 7 day comment period, on the BLM NEPA Register website (<https://eplanning.blm.gov/eplanning-ui/home>) (DOI-BLM-AK-R000-2026-0002-EA).

During the public comment period a total of 1075 public comments were received through ePlanning and individual emails from environmental organizations and members of the general public. Of the submissions received, 12 were substantive. Chapter 4 of the EA explains how the substantive comments influenced the analysis.

## **RATIONALE FOR DECISION**

The proposed action includes seismic exploration, exploration drilling, and plugging of existing wells within the NPR-A. The decision to allow the Proposed Action is not expected to result in any undue or unnecessary environmental degradation of public lands. All practicable alternatives and measures to reduce or eliminate impacts to wetlands and floodplains in the project area have been taken, and the Proposed Action is in compliance with Executive Orders 11988 and 11990. The action, as proposed, is not in conflict with other resources in the area. The request for an exception to the NPR-A Integrated Activity Plan/Environmental Impact Statement (IAP/EIS) Record of Decision (ROD) Required Operating Procedures (ROP) B-2d, B-2g and A-5 is approved.

The Alaska National Interest Lands Conservation Act (ANILCA) Section 810 analysis found that there would be no reasonably foreseeable or significant decrease in the abundance of harvestable resources (caribou and furbearers) and no reasonably foreseeable or significant limitations on harvester access (for caribou and furbearers) from the Proposed Action.

Although there are relatively stable subsistence harvest rates and the area has historically low winter use for caribou harvest, the direct and indirect impacts of the Proposed Action along with the cumulative effects of other activities (primarily energy development) in the region could alter the distribution and availability of harvestable resources (primarily furbearers) but would not significantly restrict subsistence uses beyond what has already been described and analyzed in the 2020 NPR-A IAP EIS and associated ANILCA Section 810 analysis.

On November 4, 2025, the BLM initiated consultation with the U.S. Fish and Wildlife Service (USFWS) and requested concurrence on the determination that the proposed activities are not likely to adversely affect polar bears, spectacled eiders, Steller's eiders or designated critical habitat for polar bears. On November 20, 2025, the USFWS concurred with BLM's determinations and informal consultation was concluded.

Given the time of year for the majority of the proposed activity (i.e., winter), environmental protection measures provided by the 2022 NPR-A IAP ROD ROPs, project specific ROPs, requirements by other regulatory agencies, and the additionally identified mitigation measure listed above, effects on Essential Fish Habitat (EFH) are unlikely. The Proposed Action would have "no adverse effect" on essential fish habitats and no further EFH consultation would be required.

There will be no anticipated impacts to cultural or paleontological resources by the Proposed Action, and the Proposed Action will not be expected to result in any adverse effects to Historic Properties. Required ROPs provide direction to avoid known sites as well as for the unanticipated discovery of cultural or paleontological resources.

Environmental protections provided by project specific ROPs described in the EA (Section 2.3) and the appropriate ROPs from the 2022 NPR-A IAP Record of Decision found in Appendix A of the EA will be included in all authorizations for this project. In addition, the Standard Stipulations described in Appendix B will be included in all authorizations for this project.

In addition to this Decision Record, a FONNSI and Statement of Adverse Effect have been prepared.

#### **IV. RIGHT OF PROTEST AND/OR APPEAL:**

This decision shall take effect immediately upon the date it is signed by the authorized officer and shall remain in effect while any appeal is pending unless the Interior Board of Land Appeals issues a stay (43 CFR 2801.10(b)).

This decision may be appealed to the Interior Board of Land Appeals, Office of Hearings and Appeals in accordance with 43 CFR Part 4 and DOI Form 1842-1. The notice of appeal must be filed in the Bureau of Land Management Arctic District Office, 222 University Avenue, Fairbanks, Alaska 99709 or by e-mail to [blm\\_ak\\_appeals@blm.gov](mailto:blm_ak_appeals@blm.gov) within 30 days from receipt

of this decision. Include the following in the subject line: "Notice of Appeal: Arctic District Office."

If you wish to file a petition for stay pursuant to 43 CFR 4.405 (b), the petition for stay should accompany your notice of appeal and shall show sufficient justification based on the standards in that regulation. If a petition for stay is submitted with the notice of appeal, a copy of the notice of appeal and petition for stay must be served on each party named in the decision from which the appeal is taken, and with the IBLA at the same time it is filed with the authorized officer. A copy of the notice of appeal, any statement of reasons and all pertinent documents must be served on each adverse party named in the decision from which the appeal is taken and on the Office of the Solicitor, U.S. Department of the Interior, 4230 University Drive Suite 300, Anchorage, AK 99508, not later than 15 days after filing the document with the authorized officer and/or IBLA.

#### **V. APPROVAL**

/s/Stephanie L. Kuhns  
Stephanie L. Kuhns

11/26/2025  
Date

/s/ Wayne Svejnoha  
Wayne Svejnoha

11/26/2025  
Date

#### **ATTACHMENTS:**

Form 1842-1