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[EXTERNAL] Comments for the Leasing EIS in the coastal plain 1002 area of the Arctic National Wildlife Refuge

1 message

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To: blm_ak_coastalplain_EIS@blm.gov

Fri, Jun 15, 2018 at 2:28 PM

Attached are my comments for the Leasing EIS in the coastal plain, 1002 area of the Arctic National Wildlife Refuge.



Comments on the EIS to allow leasing for oil and gas on the 1002 area of the Arctic National Wildlife Refuge.docx
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**Comments on the Leasing EIS to allow leasing for oil and gas exploration and development
in the 1002 area within the Arctic National Wildlife Refuge**

**Theodore N. Bailey
June 15, 2018**

Although I do not agree that the 1002 coastal plain area within the Arctic National Wildlife Refuge (ANWR) should be opened to oil and gas exploration and development because of conservation, burning fossil fuels/global warming and wilderness concerns, I offer the following comments to the BLM for developing a required Leasing EIS for the area.

First, I recommend the BLM review and consider, as an example of specific operational details, an Environmental Assessment completed for the Kenai National Wildlife permitting a 3D seismic exploration program on a national wildlife refuge in Alaska in July 2013. This document is available at:

Environmental Assessment – US Fish and Wildlife Service
https://www.fws.gov/alaska/nwr/planning/nepa/Apache_Final_EA_07_2013.pdf

Second, specific for the ANWR, and to insure that oil and gas exploration and development in the 1002 coastal plain area of the ANWR will be conducted without harming the environment and fish and wildlife populations (as assured by the Alaska Congressional delegation), I offer the following recommendations to be included in the Leasing EIS:

- 1) All 3D seismic survey programs in the 1002 area be conducted only by helicopter to avoid physical damage to 1002's fish and wildlife habitats and to minimize disturbance to its wildlife populations.
- 2) That no motorized tracked or wheeled vehicles be permitted to conduct seismic surveys, oil and gas exploration or development in the 1002 area unless the ground is deeply frozen and covered with an adequate snow cover. This is to protect fish and wildlife habitats and populations within the 1002 area.
- 3) That no seismic surveys, exploratory drilling or development will occur, as a minimum, during the months of June and July to protect the calving grounds of and avoid disturbing the Porcupine and Central Arctic caribou herds during their calving period.
- 4) That no seismic surveys or exploratory drilling occur during periods when breeding, nesting and migrating waterfowl, waterbirds, shorebirds, raptors and passerine birds are using the 2001 area. This may include all or parts of the months including May, August and September as well as the entire months of June and July based on research findings on the Arctic National Wildlife Refuge.
- 5) That no seismic surveys or oil and gas exploratory drilling occur within a critical distance of or during critical periods of the year along the entire coast of the 1002 area to protect denning polar bears. These critical distances and periods of year should be based on the best available biological data from polar bear research. This is needed because the threatened

and likely population-declining, Southern Beaufort Sea polar bears are increasingly using onshore denning habitat because of the diminishing Arctic ice pack.

- 6) That all exploratory drilling wells use extended reach drilling (advanced horizontal drilling) techniques in order to minimize the imprint/impacts of drilling on surface acreages within the 1002 area. These horizontal drilling distances have so far reached 12 kilometers but some in the gas and oil industry believe this could be technologically extended to reach 20 kilometers horizontal distance.
- 7) That the BLM collaboratively work with the Kaktovik Inupiat Corporation (KIC) to use the approximately 92,000 surface acres of KIC lands adjacent to the 1002 area for seismic and drilling exploration and development. The majority of KIC members apparently support gas and oil development in ANWR and they could potentially financially gain from such an agreement. KIC lands could be used as staging areas for helicopters required for some of the 3D seismic surveys on the 1002 area rather than establishing helicopter staging areas on refuge lands. KIC lands could also be used as sites for exploratory drilling pads to explore and develop sites within the ANWR using horizontal drilling or advanced extended reach drilling reaching up to 12 to 20 kilometers away from the wellhead to reach inside the refuge.

Thank you for the opportunity to provide comments for a Leasing EIS within the 1002 area of the Arctic National Wildlife Refuge.

Theodore N. Bailey, Ph.D.

Wildlife Biologist (Retired)

25-Years Alaskan experience

Experience with oil and gas exploration and development in Alaska