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[EXTERNAL] Comments on EIS for oil and gas leasing on the Coastal Plain of the Arctic National Wildlife Refuge

1 message

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Tue, Jun 19, 2018 at 6:09 PM

To: blm_ak_coastalplain_EIS@blm.gov, Beth and Ted Heuer <bethandtedheuer@yahoo.com>, Glenn Elison <glennelison@gmail.com>, "Fox, Jimmy" <jimmy_fox@fws.gov>, greg_seikaniec@fws.gov, franmauer@mosquito.net

Hello BLM and FWS employees. I was saddened to hear of this surprising legislation but I have some technical comments. I hope you read them.

From 1976 to 1979 the Fairbanks FWS office of Ecological Services participated with the BLM, USGS and Husky Oil in the exploration of NPRA. Actually, this was at BLM's invitation.

From 1979 on this office participated in the environmental review (with recommendations for mitigation) of Corps of Engineers permits for oil and gas activities on the North Slope under provisions of Section 404 of the Clean Water Act. In 1981 - 83 this office assisted the staff of the Arctic National Wildlife Refuge in monitoring the Congress - authorized seismic exploration of the "1002 Area."

I supervised this FWS office from 1976 to 1986. I participated in most of the field activities of my staff including field monitoring of the seismic trains.

The seismic train crew leaders and most of their staffs were conscientious in performing their duties under the refuge permit conditions. I was impressed with their diligence and perseverance under extreme arctic conditions. However, this was not always good enough to protect the refuge's resources.

There was a saying in the Arctic that it snows 6 inches in Barrow, then blows to Kaktovik and back again. It is worse than that. There often is not enough snow to protect the tundra from wheeled and tracked vehicle, or sled and sledge runners. I was the official sent to measure the snow depth before the seismic trains were allowed to cross on to the refuge. The top of the snow was 6" from the bottom of the tussocks. It was a thin crust with mostly air underneath. It rarely rose above the tops of the tussocks. Nevertheless, it was declared "6" of snow cover and the trains were allowed to proceed. Read here: extreme political pressure not to delay the trains, regardless of the regulations.

The extremely long, and extremely efficient and comfortable seismic camp trains were pulled by D-7 size Caterpillar bulldozers. The D-7 size was deemed the maximum weight safe for ice crossings. During the seismic program one D-7 did fall through the ice while offshore of the beach. The operator suffered a broken neck (slammed by the ice) but he did escape and survive. (A year or so later he was killed when his dozer fell through the ice of the Mackenzie River in Canada.) So fear of falling through the ice is valid for determining bulldozer weight maximums.

Because of this small size dozer (tractor puller) these vehicles often "spun out" before starting to pull the heavy sledges of the seismic camps. The tundra cover was flung far and wide, and underlying permafrost exposed the following summer. Also, when turning the trains sledges were often pulled sideways instead of just gliding across the tundra. This also resulted in scraping off the vegetation cover.

Please give careful consideration in how to mitigate the effects of the seismic trains. That was 2D seismic. Your 3D seismic program will have much more serious effects on the tundra.

One final consideration. During the monitoring of the NPRA exploration FWS biologists accompanied BLM, USGS and Husky crews to and from exploration and well sites -- conveniently and economically transported by Husky contractor airplanes and helicopters. However, the Husky crews always knew when we would arrive. All was spic and span on the pads and around the camps.

In 1979 or 80 the FWS Fairbanks office acquired a small 22' dory and thereafter in the summer visited coastal and island well sites by boat. Unannounced. We found problems. Mostly small petroleum spills on the pads, trash blowing about. Not egregious but not so emblematic of the Alaska claim that "we have a perfect environmental record on the North Slope." The FWS monitoring crews of your planned seismic operations should be fully funded and staffed to operate on land, sea and air by their own planned, and operated transportation program, including extensive (and expensive) helicopter support.

Opening of the Arctic National Wildlife Refuge to oil and gas leasing, exploration and development may be supported by many of my fellow Alaskans but I do not believe it is supported by most of my fellow Americans. Please give equal considerations to all comments on the EIS.

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s/v Sweet Mary