



CoastalPlain_EIS, BLM_AK <blm_ak_coastalplain_eis@blm.gov>

[EXTERNAL] Comment submittal on Coastal Plain leasing

1 message

DE <galed3e3@gmail.com>

Mon, Jun 18, 2018 at 6:04 PM

To: blm_ak_coastalplain_EIS@blm.gov

I have attached my comments for the proposed leasing EIS, see attachment.

Thanks for opportunity to comment

Diana Evans



ANWR BLM comments.docx

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Coastal Plain Oil and Gas Leasing Program EIS

THE FIRST TWO HEADINGS WERE COPIED FROM THE BLM EIS WEB SITE:

THE PROJECT

The Bureau of Land Management is engaging communities across Alaska in person to gather relevant comments, concerns and/or issues pertaining to the development of the Coastal Plain Oil and Gas Leasing Program Environmental Impact Statement (EIS). The EIS will serve to inform the BLM's implementation of the Tax Act, including the requirement to hold not fewer than two lease sales area-wide. It may also inform post-lease activities, including seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain. Specifically, the EIS will consider and analyze the potential environmental impacts of various leasing alternatives, including the areas to offer for sale, and the terms and conditions (i.e., lease stipulations and best management practices) to be applied to leases and associated oil and gas activities to properly balance oil and gas development with existing uses and conservation of surface resources, and to limit the footprint of production and support facilities on Federal lands to no more than 2,000 surface acres. The area comprising the Coastal Plain includes approximately 1.6 million acres within the approximately 19.3 million-acre Arctic National Wildlife Refuge

SCOPING COMMENTS

The scoping period provides an opportunity for people who could be affected by the proposed action to express their views and concerns, and to offer suggestions. The most effective comments include specific details regarding issues or concerns and provide rationale for the concern or suggestion. Ideas for effective scoping comments include:

- What are your specific concerns about a resource – and why?
- Do you know of any geographic areas of concern for a specific resource – and why?
- Do you have any ideas for alternatives to analyze?
- Give us ideas for mitigation measures or new technologies to consider in an alternative.
- Let us know about important information available in your community.

As a resident of Alaska and retired engineer who worked my last ten years for the oil companies operating on the North Slope of Alaska at Prudhoe Bay, Kuparuk, and Alaska, I submit these comments related to performing the ANWR lease sale EIS.

THOROUGH, SCIENCE-BASED DECISION- MAKING. I and the majority of Americans rely on the commitment of our government to ensure that development of our country's natural resources with an utmost respect for balance toward impacts on irreplaceable resources and native populations. This includes a commitment to using scientific data and facts from which to draw unbiased conclusions and implement prudent decisions, even if it means delaying or denying the rights for development. It means insisting on alternatives that may be more expensive (less profitable) to the Lessor, in order to maximize the probability of high-consequence, low risk events such as oil spills. The current Administration's attitude appears to be concentrated on throwing aside the well-established, legal and thorough

environmental review process of NEPA for one of expedience. One attempt at this has already been dismissed by the court system. BLM, you must stand by science and conduct this process using realistic time frames to allow for a meaningful public comment process. It's your duty to evaluate existing data for gaps and take the time to gather the scientific data to fill those gaps.

WILDLIFE. Widely recognized from those concerned about ANWR development, the biggest single issue in the debate has been the potential impacts from facilities within the 1002 area. I bring your attention to a set of maps published by USFWS in the 2001 (included as the attachment at the end of my comments), which were removed from the agency's web site in December 2001 (Original reference: USFWS. 2001. Potential impacts of proposed oil and gas development on the Arctic Refuge's coastal plain: historical overview and issues of concern. Web page of the Arctic National Wildlife Refuge, Fairbanks, Alaska. 17 Jan 2001. <http://arctic.fws.gov/issues1.html>). These maps have been preserved in this web site: http://www.mapcruzin.com/arctic_refuge/maps1.html

The series of maps by year show the range and high-density calving area for the Porcupine caribou herd between 1983 and 1999, overlayed with the 1002 area boundary, based on location of pregnant radio-collared female cows. The dark area is the 50% probability contour, and the light green is the 95% contour. These maps clearly demonstrate why this area is so important to the Porcupine herd. In all but three years out of 16, the herd calves entirely within the 1002 area.

Although I have little personal knowledge about the importance of the coastal plain to birds, this is another resource area of concern to me, and I refer you to respected conservation organizations like the Audubon Society who will provide ample comments on this issue.

The Conoco Phillips 2018 winter exploratory drilling program achieved record reach which will allow production from six miles of lateral area. Another demonstrated, feasible drilling technology includes use of Extended Reach Drilling (ERD) rigs. Any exploratory or production drilling program must demonstrate the leasor's commitment of maximizing drilling reach to minimize surface impacts. Stipulations for development must require use of these feasible technologies in lease stipulations.

A big concern relates not only to the drilling footprint, but the additional infrastructure needed to support ANWR development. Any leasing proposals shall require full disclosure of the full extent of facilities required during the term of the lease. The western-most point of ANWR 1002 area is about 60 miles east of Deadhorse, where oil-field support industry infrastructure is located (public airport, Carlisle-Kuukpik trucking, nearby termination of the Dalton Hwy "haul road", housing camps, drill rig and wireline companies such as Poole, Nabors, Halliburton, Slumberger, and ASRC; Colville Services; tourist hotel/restaurant). Where will the gravel be mined for permanent drilling pads and roads? What will lessor do with the refuse? How will they generate power in the least environmentally harmless manner? Where will the operator-company field staff be housed? Will the oil need processing facilities to allow sales quality product to be transported, and what is the gravel footprint of those facilities? Where will water for reinjection/Enhanced Oil Recovery come from, and what infrastructure will be needed?

In order to demonstrate the utmost respect for their intrusion any development lease should include the most stringent provisions, including but not limited to:

- Zero-waste generation policy
- Alternative energy such as wind for power generation for the developments
- Maximized use of electronic surveillance technologies at drill sites, which could potentially make roadless development possible

INPUT FROM LOCAL COMMUNITIES. There is much in the new media about native communities such as Kaktovik and the Arctic Village Gwich'in and their positions on development of oil in the ANWR coastal plain. I found on-line and browsed through the Kaktovik Comprehensive Development Plan (April 2015) in order to educate myself on this community's position. The tone of the document indicates (as opposed to a depiction of overwhelming support for ANWR oil from Kaktovik) that this community at the foot of ANWR is grappling with the same dilemma as we all should be. Along with the acknowledgement of economic woes and infrastructure needs that money from oil development could help support, I've pasted below the seven goals of the Comprehensive Plan. In addition, ten pages of the 100-page plan were devoted to describing the importance of subsistence to this community.

1.3 Goals of the Plan

The Kaktovik Comprehensive Development Plan includes the following 7 goals.

- **Goal 1:** Protect and enhance subsistence resources and activities.
- **Goal 2:** Establish future land use designations within the village to ensure a balance of housing, commerce, services and facilities to support strong families, traditional values, and sustainable wildlife resources.
- **Goal 3:** Support the provision of adequate housing in quantity and quality.
- **Goal 4:** Facilitate economic development activities in appropriate locations that meet the day-to-day needs of residents and visitors and that provide employment opportunities for current and future generations.
- **Goal 5:** Maintain public infrastructure, community facilities and services, and transportation systems.
- **Goal 6:** Protect historical and cultural resources.
- **Goal 7:** Foster meaningful intergovernmental cooperation.

I include this discussion on the local native communities to demonstrate how important it is to thoroughly examine and weigh the perceived benefits versus impacts of development for the coastal plain area. This includes establishing **the widest regulatory time frame for the public process** in order to accommodate the flow of their subsistence activities: sufficient public meetings in the native communities, and time enough for them to comment. Listen to their voices and narratives which are the fabric of their being. To hastily move forward without thorough deliberation on this program would add one more to the historic grievous wrongs inflicted on our native brothers and sisters.

PIPELINES. Unfortunately, any oil and gas drilling production must be brought to market via pipelines. The impact of these conveyances are often judged to be small during environmental review, since the

gravel footprint for the vertical support member footing may be only a 2- or 3-foot diameter hole for every VSM. Although the frequency varies by an array of engineering factors, there are typically 81 to 150 VSMs per mile of 12" diameter VSM, depending on whether the pipeline is unprocessed or processed produced crude oil (Northeast NPRA Supplemental IAP/EIS, pg 4-115). However, their linear nature can prove an impediment to wildlife travel, and the risk of an oil spill with pipelines is ever present.

In the ANWR coastal plain, there will be trade-offs between placing the pipeline route. The pipeline may be expected to connect (for economic reasons) with route of the existing Pt Thomson and Badami pipelines to the east along the coast. Any above-ground pipeline must cross the Canning River, which is of great concern due to its value to the area ecosystem. The Canning is the largest river and by far has the largest delta environment in ANWR. I recommend that three alternatives be considered to determine, overall, the least damaging potential environmental impact for protecting this sensitive river ecosystem:

- Across the expansive delta, which will be problematic due to the unstable, shifting channels of the Canning's large delta
- At the closest narrow reach for crossing, 20 miles upstream from the coastal Pt. Thomson facility. This requires an additional 40 miles of pipeline routing (20 miles in both south and north directions) and significantly increase the risk of an oil spill reaching the Canning River.
- Below ground, via directionally drilled casing (similar to the Alpine sales oil crossing of the Colville River)

CLIMATE CHANGE. Evaluating potential impacts of climate change on this project must be included. This is one area where scientific data acquisition and evaluation is crucial. Potential effects of climate change could lead to changes to thermal modeling and building practice revisions for industry, where permafrost could become less stable. The North Slope facilities have already experienced subsidence at drill pad well house structures, and related safety issues due to increased risk for well damage. Pipeline support subsidence could potentially be impacted if warming trends continue to increase as predicted by most models

Impacts of elevated temperatures and unstable climate cycles need to be examined as part of this EIS. It has been suggested that the historic snow cover that is penetrable by wildlife could be replaced by impenetrable ice, and decrease survival rates for many species.

Climate change could increase the occurrence of lightning strikes and cause devastating fires. A fire like the one in Ft. McMurray Alberta Canada (1.5 million acres of boreal forest and tundra) could destroy the vegetative tundra matt and result in surficial supra-permafrost melting and extensive surface water ponding that could cause a chain reaction of melting when the tundra matt is further destroyed..

TWO-STEP PROCESS ALTERNATIVE. At this point in time, there no security risk in relation to acquiring the fossil fuels needed to fuel our economy immediately. One alternative I recommend to be considered under this EIS is that instead of leasing immediately, I support a two-step process for the area. The first step would be a winter seismic and exploratory drilling program, to investigate the true

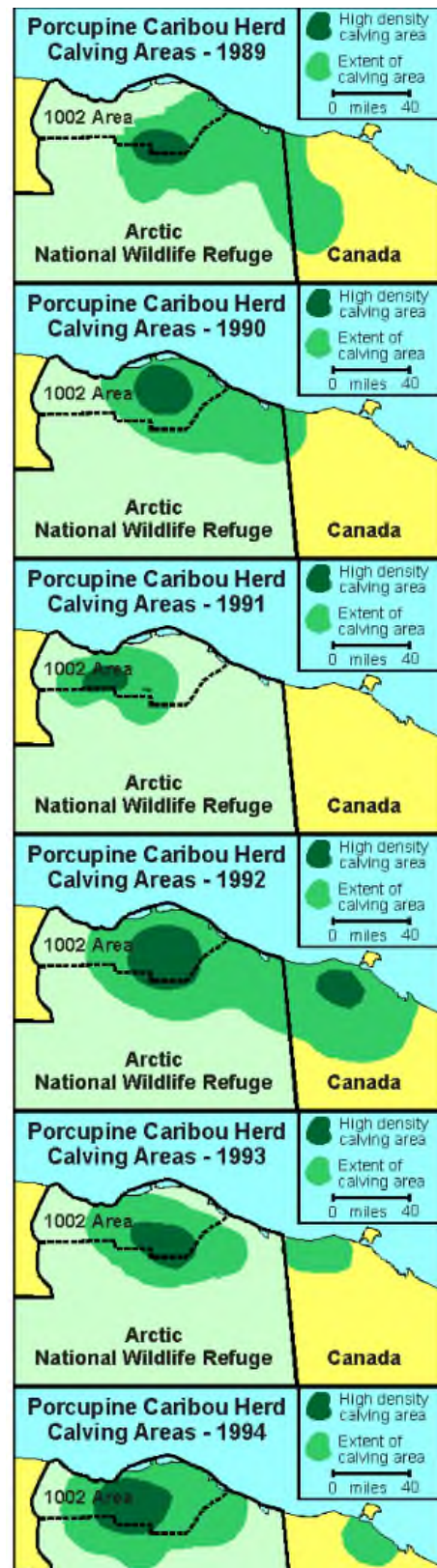
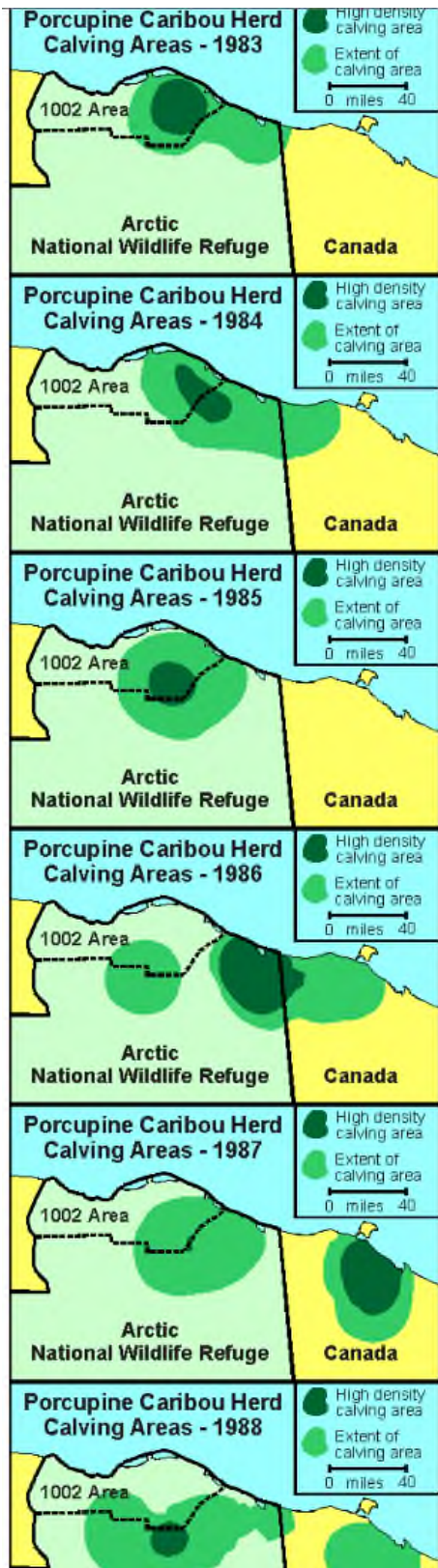
fossil fuel resources within the 1002 coastal plain region. This program would be executed under contract to a third party such as the State of Alaska or the Department of the Interior. The results would be unrestricted – publicly available to oil corporations and the American public alike. If done prudently, with timelines established for the exploratory rigs to exit ahead of the historical Porcupine calving season, such a program could be done with very little risk to the coastal area's wildlife and resources.

My reasoning for this is to slow the irrational exuberance that has overtaken objective realism, just because of an unexpected and sudden alignment of political opportunity. Those in favor have already spun a tale of extreme wealth and rosy benefits for all. I'm a firm believer in moderation, and right now the oil industry is capitalizing on tremendous opportunity in NPRA, west of Prudhoe Bay. This is smart development, where the opportunity maximizes the existing infrastructure's value chain. We have enough opportunities in other North Slope fields that we can go into ANWR using this step-wise approach. There's nothing wrong with a conservative development approach, saving our valuable resources until they're absolutely necessary.

Thank you for the opportunity to comment.

Respectfully,

Diana Evans
2518 Galewood Street
Anchorage, Alaska 99508



ATTACHMENT - CARIBOU HERD CALVING GROUND
MAPS

ATTACHMENT - CARIBOU HERD CALVING
GROUND MAPS (Original reference for these
 maps: USFWS. 2001. "Potential impacts of
 proposed oil and gas development on the Arctic
 Refuge's coastal plain: historical overview and
 issues of concern." Web page of the Arctic
 National Wildlife Refuge, Fairbanks, Alaska. 17 Jan
 2001. <http://arctic.fws.gov/issues1.html>). These
 maps have been preserved in this web site:
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