FINDING OF NO NEW SIGNIFICANT IMPACT


ConocoPhillips Alaska, Inc.

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AA081834/ AA090707/ AA090710/ AA091675/AA092673/ AA094405/
AA094413

Prepared by
U.S. Department of the Interior
Bureau of Land Management
Arctic District Office
Fairbanks, Alaska
Finding of No New Significant Impact

Type of Action: Application Permit to Drill/Right-of-Way


Environmental Assessment Number: DOI-BLM-AK-R000-2019-0003-EA

Applicant: ConocoPhillips Alaska, Inc.
700 G Street
Anchorage, Alaska 99501

Office: Arctic District Office


Lands Involved: Northeast National Petroleum Reserve - Alaska

Environmental Assessment Summary:

ConocoPhillips Alaska, Inc. (CPAI) applied for Application to Drill Authorizations and a Right-of-Way Authorization to conduct exploration activities within the NPR-A on lands managed by the Bureau of Land Management (BLM).

The proposed activities include the following:
<table>
<thead>
<tr>
<th>Project Component</th>
<th>Program Specifics</th>
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<tbody>
<tr>
<td>Ice Pads</td>
<td>Up to 12 pads approximately 600 feet × 600 feet, Up to 4 pads approximately 420 feet × 210 feet, Up to 2 pads approximately 300 feet × 300 feet</td>
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<tr>
<td></td>
<td>1 pad approximately 500 feet × 500 feet, 1 pad approximately 1500 feet × 1000 feet, 1 pad approximately 100 feet × 100 feet</td>
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<tr>
<td></td>
<td>1 pad approximately 400 feet × 200 feet, 1 pad approximately 12.1 acres</td>
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<tr>
<td>Drilling/Testing Locations</td>
<td>Up to 8 Locations</td>
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<tr>
<td>Ice Airstrip</td>
<td>1 located at Lake M0007</td>
</tr>
<tr>
<td>Construction/Drilling Support Camps</td>
<td>Maximum Number of People that may be housed in camps is 545, However the average daily usage would be approximately 290</td>
</tr>
<tr>
<td>Access</td>
<td>Approximately 57 miles of Ice Access. Approximately 42.7 miles of Snow Trail on BLM Managed Land.</td>
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<tr>
<td>Water requirement</td>
<td>Total of 130.41 MG for the entire project.</td>
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<tr>
<td>Lake Use</td>
<td>Up to 45 lakes, 37 on BLM Managed Land</td>
</tr>
</tbody>
</table>

The proposal follows the drilling exploration design reviewed in the NPR-A Integrated Activity Plan and Environmental Impact Statement (IAP / EIS). The proposal was prepared to be consistent with the Best Management Practices (BMPs) presented in the 2012 NPR-A IAP/EIS Record of Decision (ROD) and the 2008 Northeast NPR-A SIAP/EIS ROD Lease Stipulations. The following excerpt from the 2013 IAP/EIS ROD explains the goal of the plan and BMPs:

The plan adopted by this decision balances the Secretary’s responsibilities to provide for oil and gas leasing and to protect and conserve the important surface resources and uses of the Reserve.

This decision is reached after an extensive outreach effort that ensured that all voices were heard and that BLM benefited from a wide variety of perspectives. Early in the process the BLM invited the North Slope Borough (NSB), the State of Alaska, and federal agencies with expertise relevant to NPR-A’s management to join as cooperating agencies.

This decision established performance-based stipulations and best management practices, which apply to oil and gas and, in some cases, to non-oil and gas activities within the NPR-A, and requires studies and monitoring. (ROD, page iii and iv).

The EA evaluates the proposed action and incorporates, by reference, previous relevant studies and findings on activities in the NPR-A, and the North Slope in general. The applicant discussed its project proposal with local residents as noted in the EA (1.5 and 1.6 Public Involvement – Scoping and Issues).
In addition to consideration of the direct, indirect and cumulative impacts of the proposed action and the mitigation measures from the ROD, the BLM also considered site-specific mitigation measures. Stipulations and restrictions developed by the various agency review processes and this EA include: the protection of polar bears and their habitat, avian resources, the protection of fish habitat and water resources, the protection of cultural and paleontological resources, the protection of subsistence resources and the protection from any impacts of hazardous and solid wastes.

Table 1.2 describes the issues considered in Evaluating Impacts. The determination of the impact found was either Not Present\(^1\), Minimal Impact\(^2\) or Potentially Affected\(^3\). There are no Areas of Critical Environmental Concern or Wild and Scenic River Systems within the project area, no known cultural or paleontological resources and no known Native American Religious concerns. Minimal impacts are expected for Air Quality, Flood Plains/Wetlands and Riparian Zones, Invasive, Non-native Native species, Threatened & Endangered Species Steller’s eider, Threatened & Endangered Species Spectacled eider, Threatened & Endangered Species Polar Bear, Non threatened and endangered birds, Non threatened and endangered mammals, vegetation, Visual Resource Management, Waste (Hazardous/Solid) Wilderness Characteristics, and Recreation Resources. Those resources that have potential to be impacted are: Fish and Water, Environmental Justice, Sociocultural Systems, and Subsistence. The potential direct and indirect impacts will be mitigated effectively by requirements of the NPR-A ROD and additional permit stipulations determined in Section 4.3 of the EA.

The analysis for this Environmental Assessment (EA) is tiered off:

- the National Petroleum Reserve-Alaska Integrated Activity Plan Environmental Impact Statement (IAP/EIS) (USDOI BLM 2012) and Record of Decision (ROD) (USDOI BLM 2013),
- the SEIS for the Alpine Satellite Development Plan for the Proposed Greater Mooses Tooth One Development Project
- the SEIS for the Proposed Greater Mooses Tooth Two Development Project(USDOI BLM 2018)
- the 2008 Northeast NPR-A SEIS,

which are incorporated in their entirety by, reference in accordance with CEQ Regulation 40 CFR 1502.21. The EA is also tiered to prior year NEPA conducted for O&G activity as shown in Appendix G of the EA.

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1 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
2 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, BMPs 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
3 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.
Previous NEPA found:

The 2012 IAP: Alternative B-1 cumulative would significantly restrict by displacement of resources and impacts to access.
The 2014 GMT1 SEIS: All alternatives and cumulative: May significantly restrict by displacement of resources and impacts to access.
The 2018 GMT2 SEIS: Alternative A: may significantly restrict by displacement of resources. Cumulative: May significantly restrict by displacement of resources and impacts to access.

The Cumulative impacts have been described in this EA and it has been determined that no new significant cumulative effects will result from this action combined with the reasonable foreseeable effects of other past, present, and future oil and gas activities in the area.

It is concluded that the BMPs included by the Secretary of the Interior in the ROD for the Final IAP/EIS for the NPR-A, Lease Stipulations for the NE SIAP/EIS and other agency permit requirements, and BLM project specific stipulations are adequate to assure protection of the environment, protection of Fish and Water, Environmental Justice, Sociocultural Systems, and Subsistence Resources. As a result, no new significant direct or indirect impacts or cumulative effects are expected from this proposed action.

Public Access to the Process

The project proposal was made available on the Alaska BLM NEPA website on October 11, 2018. The preliminary EA was posted on the website for a 2 week public comment period from November 9 through November 23. The EA was completed December 6, 2018. Information about the EA is available for review on the BLM website, https://www.blm.gov/epl-front-office/eplanning/nepa/nepa_register.do. Public comments were received on the project. These comments were addressed in Appendix I of the EA.

810 Compliance

This proposed action would not, in and of itself, significantly restrict subsistence uses for the community of Nuiqsut. The proposed action would be anticipated to result in temporary and less than significant restrictions primarily associated with limitations on hunter access and reduced availability of subsistence resources in areas where they are traditionally harvested. Previous NEPA reviews and associated ANILCA subsistence evaluations for development projects in the same general area of the northeast NPR-A (i.e., ASDP, GMT1, and GMT2) have described and disclosed direct, indirect, and cumulative effects to subsistence that, considered together, may significantly restrict subsistence uses. No reasonably foreseeable and significant decrease in the abundance of harvestable resources is expected to result from the proposed action, and no new significant impacts are anticipated.
**Context and Intensity of Environmental Impacts**

Based upon a review of the EA prepared by the Arctic District Office and the supporting documents, I have determined that the proposed action will not have any new significant effects on the quality of the human environment, either individually or cumulatively. Therefore, an environmental impact statement is not required. We reviewed the context of the proposed action and found that it would not result in increased significant effects to resources and values in NPR-A. The need and purpose of this project is to allow CPAI to conduct winter activities within the NPR-A. The mitigation measures and environmental protections would ensure that the Proposed Action would not add significantly to incremental impacts to NPR-A and surrounding lands.

**Monitoring and Mitigation**

BLM will monitor on the ground activities throughout the time period of the permit, ensure that all standards have been met and that the areas of operations are clean and free of debris. This will be accomplished through on-site compliance inspections of the project and the submittal by CPAI of weekly reports of their activity. If any instances of non-compliance are observed BLM will work with CPAI to remedy the problem.

Mitigation measures will be implemented as described in Section 4.3 and Appendix B of the EA.

**Conclusion**

The proposed action, as submitted by the applicant and including the mitigating measures reviewed in the environmental assessment (DOI-BLM-LLAKR000-2019-0003-EA), is found to have no new significant impacts on the environment and will cause no undue or unnecessary degradation to the public lands. 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 anticipated to have any new cumulatively significant impacts.

The evaluation and finding done to comply with Section 810 of ANILCA found no new significant restrictions to subsistence uses or resources.
**Recommendation:**

It is recommended that the Application Permit to Drill applications and the Right-of-Way be approved as described in the applicant's Plan of Operations. The preparation of an Environmental Impact Statement is not recommended.

The Right-of-Way will be approved under the authority of 43 Code of Federal Regulations Part 43 2800 (43 CFR §2800). The grant holder shall be subject to applicable BMPs from the IAP/EIS ROD and Project Specific requirements determined in the EA. The Application Permit to Drill would be approved by 43 Code of Federal Regulations Part 3100 (43 CFR §3100) and would be subject to applicable BMPs from the IAP/EIS ROD, Lease Stipulations and Project Specific requirements determined in the EA.

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

**APPROVED:**

/s/ Nichelle Jones, Manager
Arctic District Office

December 7, 2018

/s/ Robert Brumbaugh for: Wayne M. Svejnoha, Branch Chief
Energy and Minerals

December 7, 2018