

U.S. House of Representatives
Committee on Natural Resources
Washington, DC 20515

September 20, 2018

Mr. Brian Steed
Deputy Director, Policy and Programs
Bureau of Land Management
1849 C St. NW
Washington, DC 20240

Dear Deputy Director Steed:

We are writing to express our concerns with the proposed Willow Master Development Plan (Willow Plan) submitted by ConocoPhillips and urge you to continue to adhere to the protections developed in the 2013 Integrated Activity Plan (IAP) for critical subsistence and environmental resources in the National Petroleum Reserve-Alaska (Reserve). We are particularly concerned with the proposal in the Willow Plan to construct roads and drill pads in the Teshekpuk Lake Special Area, including a drill pad within the Teshekpuk Lake Caribou Habitat Area.

Congress specifically mandated enhanced protection for Teshekpuk Lake and other special areas in the Naval Petroleum Reserves Production Act of 1976, due to the importance of Teshekpuk Lake to migratory birds and waterfowl. Because of this, the IAP, which was developed through an extensive public process spanning more than two years, including multiple public comment periods, meetings, hearings, and tribal consultation, closed the majority of the Teshekpuk Lake Special Area to leasing and other development activities. The IAP expanded the Special Area's purpose to include the protection of important caribou habitat. The Teshekpuk Lake Caribou Habitat Area is especially important for the Teshekpuk Lake Caribou Herd, a vital subsistence resource for communities on the North Slope.

Unfortunately, Interior officials appear committed to eliminating protections provided in the IAP. In August, Assistant Secretary for Land and Minerals Management Joe Balash was quoted as saying that a "redeveloped" IAP, "will make millions more acres available for leasing."¹ This is completely unnecessary, as demonstrated by the lackluster results of the December 2017 lease sale in the Reserve, where the oil and gas industry bid on less than 1 percent of the acreage offered for lease. The balance of conservation and development embodied in the 2013 IAP should not be undermined just so Secretary Zinke can tout another "largest ever" lease sale.

Leasing and development decisions in the fragile wilderness of the Arctic need to be made carefully, not rushed to meet arbitrary timelines laid out in Secretarial Order 3355. A massive

¹ E. Harball, *Interior official: 'millions' more acres in NPR-A to open for oil development*, Alaska Public Media, August 9, 2018.

satellite drill pads, dozens of miles of roads, an airstrip, a new gravel mine, and a new artificial island offshore, among other features, requires a robust and thorough environmental analysis, not a truncated one-year/300-page limit. In addition to protecting Teshekpuk Lake and other special areas, the IAP set out a suite of lease stipulations and best management practices. Given the scale of this project, we are concerned about the potential for ConocoPhillips to seek a waiver of these protective provisions. The Bureau of Land Management (BLM) must fully analyze how this project will comply with the IAP's stipulations and best management practices for sensitive areas such as the Teshekpuk Lake Caribou Habitat Area and should not allow waivers of those protections.

Impacts of the Willow Plan on the community of Nuiqsut must be closely scrutinized as well. The Plan would extend development even further into Nuiqsut's remaining subsistence use areas and further compound the significant impacts already being experienced by that community due to the breakneck pace of new oil and gas development in the reserve. Sadly, the BLM has resisted multiple calls from the community to slow down the pace of development, and in fact has gone in the opposite direction, speeding up project reviews and approvals. The people of Nuiqsut do not deserve to become casualties in this administration's relentless and unnecessary obsession for achieving "energy dominance."

Thank you for your attention to these comments.

Sincerely,



Raúl M. Grijalva
Ranking Member
House Committee on
Natural Resources



Jared Huffman
Ranking Member
Subcommittee on
Water, Power and Oceans



Alan S. Lowenthal
Ranking Member
Subcommittee on
Energy & Mineral Resources

cc: Ferris Couture, Bureau of Land Management