

Alaska Oil and Gas Association



121 W. Fireweed Lane, Suite 207
Anchorage, Alaska 99503-2035
Phone: (907)272-1481 Fax: (907)279-8114
Email: crockett@aoga.org
Marilyn Crockett, Executive Director

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Ms. Sharon Seim, Planning Team Leader
Arctic National Wildlife Refuge
101 12th Avenue, Room 236
Fairbanks, AK 99701

Dear Ms. Seim:

On behalf of the Alaska Oil and Gas Association (AOGA), we appreciate the opportunity to provide comments on the U. S. Fish and Wildlife Service's (USFWS) plans to revise the Comprehensive Conservation Plan for the Arctic National Wildlife Refuge (ANWR). AOGA is a private, nonprofit trade association whose members account for the majority of oil and gas exploration, production, transportation, refining and marketing activities in Alaska.

AOGA believes it is completely appropriate to revise the 20+ year old conservation plan. As acknowledged in the Planning Update dated April, 2010, new information about refuge fish, wildlife and habitats is available which can and should be taken into account in the revised plan. What is not specifically discussed in the Update is the considerable experience the Service has had, dating back as far as the 1920's, in managing refuges within the nation's system where oil and gas development has occurred concurrently with maintaining the refuges' values. In fact, after oil was first discovered near the Swanson River in 1957 (prior to Alaska's statehood), a National Wildlife Refuge was created. Over 50 years later, oil and gas continues to be developed while maintaining the Kenai National Wildlife Refuge.

Also not specifically acknowledged is the tremendous technological advancements which have taken place in techniques used in oil and gas exploration and development and the role these advancements play in reducing the environmental footprint of these operations. For example, the pad size for drilling operations on the North Slope has been reduced by over 90%. Wells used to require at least 120 feet between each other, where now the same well can be placed just 10 feet from the next one. Not only can wells be placed closer to each other, the depths and reach of the wells are enhanced by what is known as "extended reach" drilling. These extended reach wells target resources up to eight miles from the surface location of the

drilling rig, which allows much more reservoir area to be drained from a single production pad on the surface. Another new technology currently employed on the Slope is the drilling of several wells underground which feed oil and gas into a single well-bore to the surface. Several of these “multi-lateral” wells are utilized with at least two wells drilled off a single, often older, well.

As is the case in other areas of the country where oil and gas exists in sensitive ecological areas, Alaska continues to be a success story for the famed Central Arctic caribou herd. When oil and gas activities began in the 1970’s, the herd consisted of approximately 5,000 animals. Almost 35 years later, the herd now numbers over 60,000. Because of the oil and gas activity on the North Slope, extensive wildlife research has been conducted by industry, thereby expanding the knowledge base about various animals. The oil and gas industry utilizes this information in planning and carrying out its operations. For example, industry conducts Forward Looking InfraRed Sensor (known as FLIR) to assist the USFWS in verifying the location of polar bear dens. FLIR helped detect a polar bear den during the construction of a seasonal ice road, and as a result, the construction of the road was modified so as not to disturb the pregnant polar bear during hibernation.

Although the Service acknowledges that a decision to allow development in the 1002 Area of the Refuge (which represents only 8 percent of the Refuge’s total size of 19 million acres) is exclusively left to Congress, many are concerned that the outcome of this planning revision could include a recommendation for the designation of Wilderness for this area. Such an outcome fails to take into account the experience and technological advancements and would have the practical effect of usurping Congressional intent.

Even with the demand for additional renewable energy, the U. S. Energy Information Administration forecasts demand for oil and gas will increase by over 30% by 2025. The U. S. Geological Survey (USGS) estimates that between 5.7 and 16.0 billion barrels of technically recoverable crude oil and natural gas liquids are likely to be found in the ANWR coastal plain, which is believed to be the single largest crude oil resource onshore in the United States. Comparatively, over the last 30 years, total production from Alaska’s North Slope is just over 16 billion barrels per day. Alaska currently supplies about 12% of the nation’s domestic production. Production of ANWR could range up to almost a million barrels of oil per day, a significant amount that would provide much needed oil into the Trans-Alaska Pipeline System, which is currently about one-third its capacity. Clearly, putting these substantial resources off-limits will threaten the nation’s energy security by continuing to increase reliance on foreign imports to meet the nation’s energy needs.

Alaskans have consistently recognized the importance of allowing oil and gas development in the coastal plain. As recently as this past January, polls indicate that 78% of Alaskans were supportive of opening the Coastal Plain. Oil and gas development and environmental protection of arctic resources are not mutually exclusive.

As the process continues in developing a new CCP for ANWR, it is vital that responsible oil and gas development remain an option for Congressional approval. Global demand for oil and gas is increasing, mega reservoirs on U.S. soil are few and far between, and technology continues to evolve providing more production with less impact.

Thank you for this opportunity to comment. We will continue to be engaged throughout the development of the revised Plan.

Sincerely,

A handwritten signature in black ink that reads "Marilyn Crockett". The signature is written in a cursive, flowing style.

MARILYN CROCKETT
Executive Director