

# Overview of Permitting Framework

## *Alaska North Slope Oil and Gas Activities*

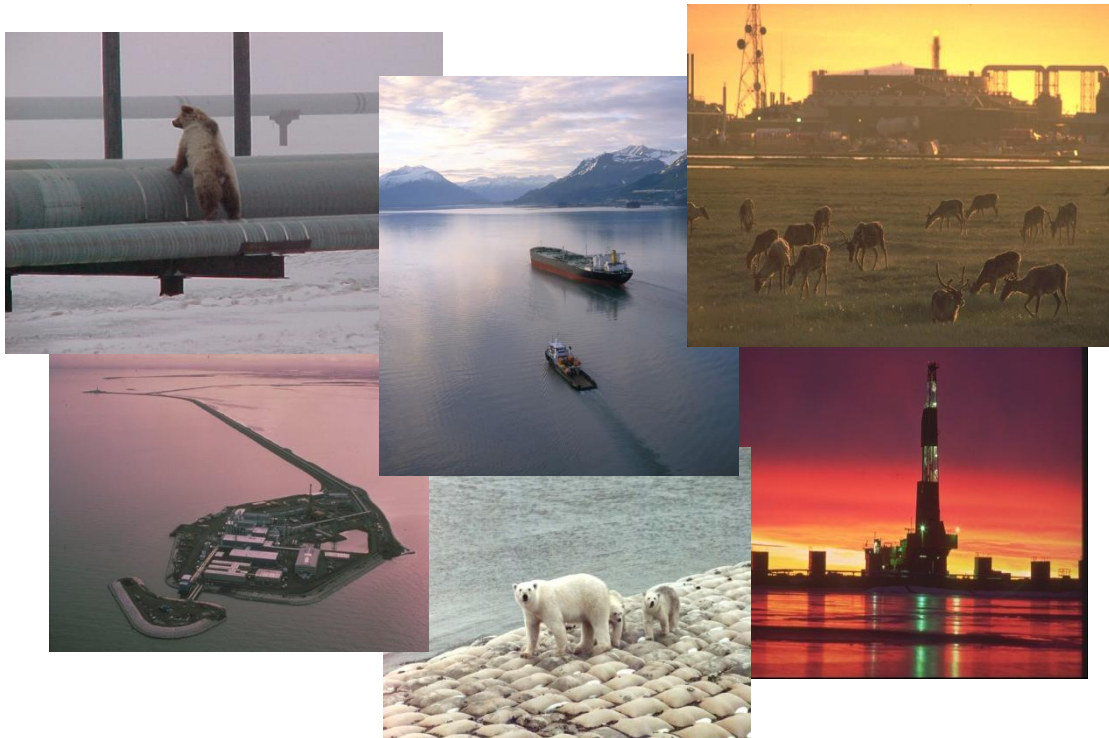
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# Objectives and Scope

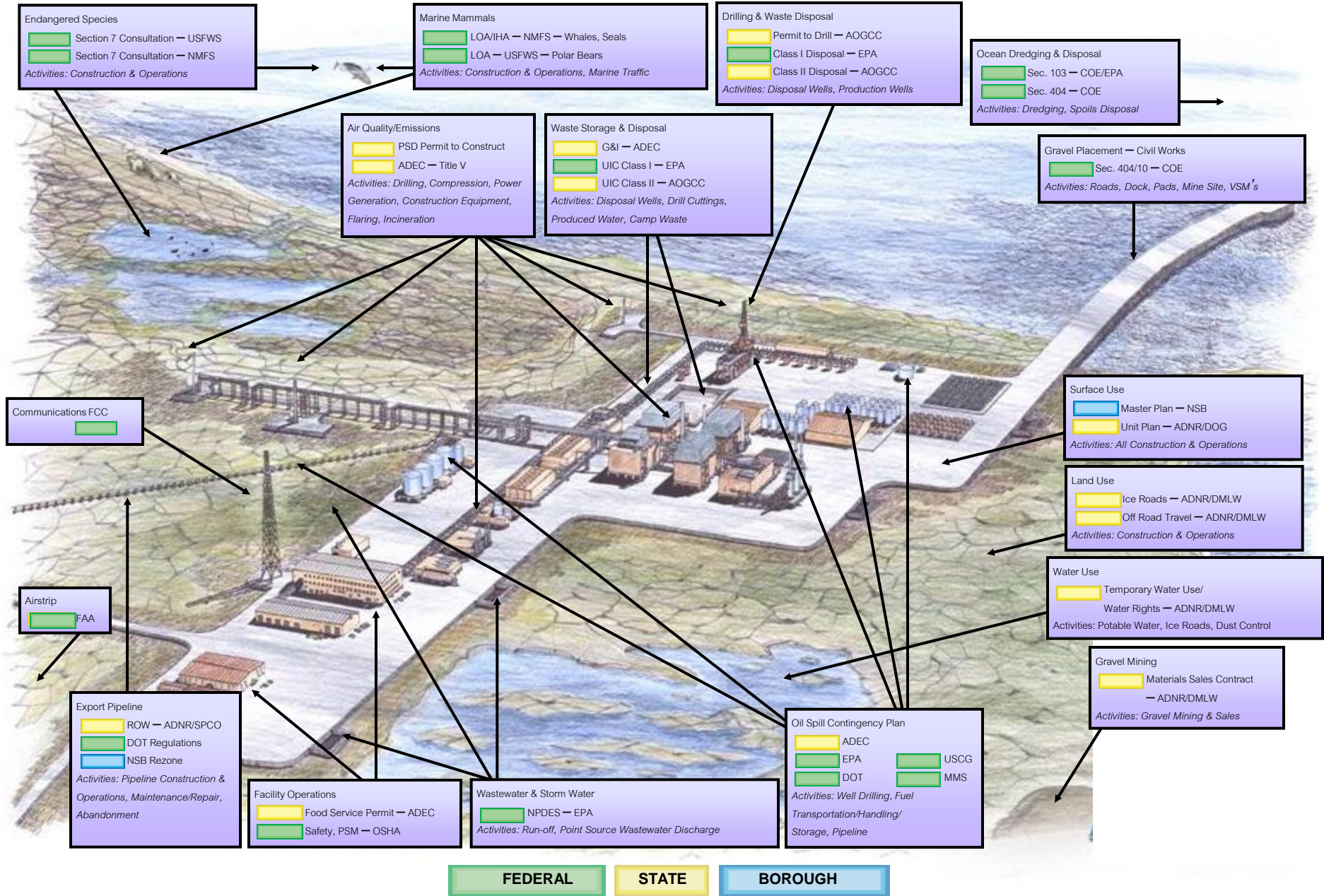
- Provide a high level overview of federal, state, and local framework for permitting exploration and development projects
- Scope includes projects in State lands and water as well as on OCS
- We will not cover any permitting requirements in detail....



# Key Concepts

- Permitting involves multiple layers of government
- Jurisdiction can overlap
- Programmatic reviews / approvals vs. specific authorizations
- Not all regulatory requirements require permits, but do require investment and planning for compliance

# Representative Development Project: Typical Approvals



# Typical Permitting Requirements

## Onshore Exploration: State Lands

### Federal

- Camp wastewater discharge permit\*
- Polar bear Letter of Authorization

### State

- ACMP consistency
- Land use permit (ice road, offroad travel)
- Fish habitat permit
- Water use permit (ice road, drilling, camp)
- Lease/Unit Operations approval
- Air Quality Permit – drill rig and camp
- Oil Discharge Prevention and Contingency Plan / C-Plan
- Drilling waste storage
- Permit to Drill

### NSB

- Development Permit (or admin approval)

## Offshore Exploration: OCS

### Federal

- BOEMR Exploration Plan
- Permit to Drill
- Oil Spill response plan
- Wastewater discharge
- Endangered species consultation
- Polar bear Letter of Authorization
- Seal / whale Incidental Harassment Authorization
- Air Quality Permit – drill rig and camp

### State

- ACMP consistency
- Land use permit (ice road, offroad travel)
- Water use permit (ice road, drilling, camp)

### NSB

- Development Permit

## Onshore Development: State Lands

same requirements as exploration

permits plus:

### Federal

- Environmental Impact Statement or Assessment
- Endangered species consultation
- Section 404/10 permit for gravel fill
- Injection well authorization
- Wastewater and stormwater discharge permit\*

### State

- Gravel materials sales contract
- Lease/Unit Operations approval
- Waste management facility / wastewater disposal
- Pipeline right-of-way

### NSB

- Rezoning

\*will transition to State jurisdiction

# Generalized Permitting Timeframes

*Timeframes are from the submittal of complete application, and do not include baseline data collection or preconstruction monitoring – these could add additional 1-3 years*

Small Projects (2 - 4 weeks)	<ul style="list-style-type: none"><li>• New modules/skids</li><li>• VSMs</li><li>• Cable trenching</li><li>• In-field ice road</li></ul>
Medium Projects (3 - 9 months)	<ul style="list-style-type: none"><li>• Gravel pad expansion</li><li>• Small, new pads</li><li>• Pipelines (non-common carrier)</li><li>• Exploration well</li><li>• New water source</li><li>• New gravel source</li><li>• Contaminated site rehab</li><li>• Solid waste storage facility</li></ul>
Large Projects (6 – 30+ months)	<ul style="list-style-type: none"><li>• Multiple new pads</li><li>• New developments</li><li>• Modification or new emissions (air permit)</li></ul>

# Programmatic Reviews

- National Environmental Policy Act (NEPA)
  - Required for federal actions that could significantly affect the environment – includes permit issuance
    - EIS or EA
  - Conducted by the federal agency, sometimes with cooperating agencies; applicant role varies
  - EIS = multi year, multi \$million
  - Litigation prone (procedural grounds, recently substantive)
  - Challenge to coordinate all approvals timing

# Programmatic Reviews (cont)

- Alaska Coastal Management Program
  - Determines consistency of activity against coastal policies and standards, State plus local District (NSB)
  - Is NOT a permit, but consistency is required before permit issuance

*Kevin will cover in more detail*

# Practicalities

- Long lead time approvals / permits drive the schedule (6-30 months)
  - Air permits to construct (new sources), gravel mining, wetlands fill (even without EIS)
- Seasonal construction windows create schedule sensitivities
  - Winter ice roads
  - Summer sealift
- Agency Resourcing can be a constraint