

## Alaska Oil and Gas Association

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*Kara Moriarty, President & CEO*

January 4, 2019

Sharon Randall  
Chief of Environmental Analysis Section  
BOEM, Alaska OCS Region  
3801 Centerpoint Drive, Suite 500  
Anchorage, AK 99503

Re: Oil and Gas Lease Sales: Alaska OCS – EIS for 2019 Beaufort Sea Lease Sale  
ID: **BOEM – 2018 – 0054 – 0001**.

Dear Ms. Randall:

These comments are made on behalf of the members of the Alaska Oil and Gas Association (“AOGA”), who account for a majority of the oil and gas production and related operations in Alaska. On behalf of our members, AOGA is grateful to the Bureau of Ocean Energy Management (“BOEM”) for the opportunity to be heard.

AOGA endorses the testimony and written comments submitted by the American Petroleum Institute (“API”). In addition, we respectfully note that since 1971, 84 wells have been drilled in the Arctic Outer Continental Shelf (“OCS”). All those wells have been operated without incident. Throughout those operations, our member companies (and non-members alike) have succeeded in their efforts to co-exist with the people of the Arctic, the environment, and the species that live there. Oil and gas producers consistently work with communities to incorporate traditional knowledge in decision-making,<sup>1</sup> establish conflict-avoidance agreements,<sup>2</sup> and work within seasonal drilling limitations. Furthermore, development of the Beaufort Sea will increase infrastructure and economic opportunity for Alaska’s Arctic communities.

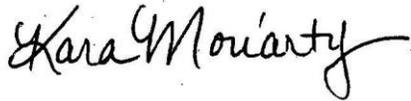
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<sup>1</sup> Examples include, but are not limited to, oil and gas producers in the Arctic consult with the North Slope Borough’s Department of Wildlife Management, employ local residents to be protected species observers, work with local residents to identify transportation routes to best avoid seal lairs, and utilize traditional knowledge regarding tundra sodding techniques.

<sup>2</sup> For example, oil and gas operators are careful not to interfere with spring and fall Bowhead whaling activities, and coordinate same with the Alaska Eskimo Whaling Commission.

AOGA therefore respectfully requests that the Environment Impact Statement prepared for the Beaufort Sea OCS Lease Sale consider not only the points raised in API's comments, but also the continued, decades-long track record of safe and environmentally responsible operations by producers in the Arctic OCS, as set forth above.

Respectfully,

A handwritten signature in black ink that reads "Kara Moriarty". The signature is written in a cursive style with a long, sweeping tail on the letter "y".

Kara Moriarty  
President/CEO