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
# 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*

<table>
<thead>
<tr>
<th>Small Projects (2 - 4 weeks)</th>
<th>New modules/skids</th>
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<tbody>
<tr>
<td></td>
<td>VSMs</td>
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<td>Cable trenching</td>
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<td>In-field ice road</td>
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<tr>
<th>Medium Projects (3 - 9 months)</th>
<th>Gravel pad expansion</th>
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<td>Small, new pads</td>
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<td>Pipelines (non-common carrier)</td>
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<td>Exploration well</td>
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<tr>
<th>Large Projects (6 – 30+ months)</th>
<th>Multiple new pads</th>
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<tr>
<td></td>
<td>New developments</td>
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<td>Modification or new emissions (air permit)</td>
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|                                   | New water source     |
|                                   | New gravel source    |
|                                   | Contaminated site rehab |
|                                   | Solid waste storage facility |
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