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ATTN: 2017-2022 OCS Oil and Gas Leasing Program Draft Programmatic EIS

This letter provides comments from Arctic Iñupiat Offshore, LLC (AIO) on the Bureau of Ocean Energy Management's (BOEM) Draft Programmatic Environmental Impact Statement (EIS) for the Outer Continental Shelf (OCS) Oil & Gas Leasing Program: 2017-2022 (Proposed Program) as required under the National Environmental Policy Act (NEPA). AIO appreciates BOEM conducting their due diligence as outlined by NEPA as they conduct their review of potential impacts and alternatives to the Proposed Program. AIO recognizes BOEM's efforts to ensure that oil and gas development proceed in a safe and sustainable manner with manageable impacts; AIO is encouraged that the Arctic OCS is included in this framework.

Background

About AIO

AIO is a privately held corporation established to promote sustainable economic development within Alaska's North Slope region. Members of AIO include the Native regional corporation for the North Slope region, Arctic Slope Regional Corporation (ASRC), and the Native village corporations of Ukpeaġvik Iñupiat Corporation (UIC), Tikigaq Corporation, Olgoonik Corporation, Atqasuk Corporation, Kaktovik Iñupiat Corporation (KIC), and Nunamiut Corporation. The Native villages represented by the village corporations include Barrow, Point Hope, Wainwright, Atqasuk, Kaktovik and Anaktuvuk Pass, respectively.

AIO aims to create alignment for responsible resource development within the North Slope region by working together to understand future community needs, to ensure our members have a seat at the table as development within the region proceeds, and to foster economic stability within the region. This alignment is critical to the success of OCS

exploration and development activities, and ensures that the Iñupiat values are preserved, specifically our subsistence culture. AIO's connection to and understanding of the Arctic environment gives AIO a better awareness of the nuances associated with mineral resource development in our unique Arctic ecosystem and makes us uniquely qualified on proposal activities in our region.

Recently, AIO had an unparalleled experience participating in OCS exploration and development in our region. In 2015, AIO demonstrated that coexistence between industry and the local peoples can be mutually beneficial by executing an agreement with Shell Gulf of Mexico, Inc (Shell) that allowed AIO and its members a seat at the table for exploration and development activities. AIO witnessed firsthand as Shell conducted a safe and successful exploration of their Chukchi Sea leases with minimal impacts. AIO is encouraged by this recent example and looks forward to the legacy of safe operations in the Arctic OCS continuing through the Proposed Program.

AIO and its members are supportive of responsible resource exploration and development, both onshore and offshore, in Federal and State lands and waters. The economic stability and subsistence lifestyle of our communities is of paramount importance to AIO, as both the benefits and adverse impacts of oil and gas exploration and development are felt by our communities. It is through critical analysis of the abundance of traditional knowledge and scientific research, along with the history of safe operations and collaboration with industry that AIO is able to support responsible resource development, onshore and offshore.

AIO has a vest interest in preserving the OCS as a viable option for future exploration and development, which guarantees positive economic impacts to the Iñupiat people. AIO asserts that with the appropriate mitigation to minimize impacts to the environment, particularly the bowhead whale subsistence hunt, responsible offshore development can continue to occur safely.

History of the Arctic OCS

The Alaskan Arctic has sustained the Iñupiat people of the North Slope for centuries. The Alaskan Arctic encompasses the Arctic North Slope region and is home to eight Iñupiat communities, six of which are coastal communities on the Beaufort and Chukchi Seas. Within the region's rich history and plethora of resources, the Iñupiat people have flourished in this harsh environment by relying on our values and traditional knowledge to cultivate and steward our resources both onshore and offshore; these resources include marine mammals, the environment, and oil and gas reservoirs. This region has been thoroughly studied and observed by our people for generations, and in recent decades, western science has conducted extensive research of arctic. The Iñupiat people are experts of their environment having survived and thrived in harsh conditions for centuries, the

traditional knowledge passed down from generations of keen observations continues to guide the Iñupiat people, as well as the oil and gas activities taking place in the region.

The United States (U.S) Arctic has produced over 16 billion (bil) barrels of oil (bbl). Though most of the exploration and production has occurred onshore, offshore exploration and development has taken place for over 50 years (NPC 2015). The Arctic OCS, which includes the Chukchi Sea, Beaufort Sea, and Hope Basin, is expected to contain 51 bil barrels of oil equivalent (BBOE) (NPC 2015). The North Slope has experienced decades of oil and gas exploration, development, and production and is home to the largest oil field in North America, Prudhoe Bay, which was discovered in 1968. Oil and gas exploration, development, and production are not frontier activities in the Arctic as so often characterized. Rather, over 440 exploration wells have been drilled in the Arctic, 36 alone in the Alaska OCS (NPC 2015). Likewise, arctic offshore exploration and development has also been conducted in Alaska State waters and across many of our neighboring nations. AIO respectfully asks that BOEM consider and include the long history of safe exploration and development in the Alaskan Arctic, both in State and Federal waters, throughout their analysis of the Programmatic EIS.

Arctic Program Areas

AIO is encouraged to see that both the Chukchi and the Beaufort Planning Areas remain in the Proposed Program. AIO maintains that safe and responsible development of OCS can continue to proceed with manageable impacts and looks forward to BOEM's continued analysis. With proper respect to the traditional knowledge and western science which support existing mitigation measures, AIO is confident that BOEM will conclude that exploration of the OCS can continue with existing mitigation to reduce or avoid potential impacts. Both Lease 254 in Beaufort Sea and Lease Sale 262 in the Chukchi Sea encompass prolific prospects and have the opportunity to provide for the economic stability of our Iñupiat communities for decades. In light of this, AIO is disheartened that BOEM has decided to place these lease sales at the end of the Proposed Program "to provide additional opportunity to evaluate and obtain information regarding environmental issues, subsistence use needs, infrastructure capabilities, and results from any exploration activity associated with existing leases."

While AIO appreciates the sensitivity shown to our region, AIO rejects the rhetoric which implies that Arctic oil and gas activities are not supported by environmental information, conflict with subsistence use needs, and are not supported by existing infrastructure; we find all of these assumptions contrary to our reality.

AIO is abundantly aware of the volume of traditional knowledge and western science which support exploration and development of the Arctic OCS. AIO would like to emphasize that this is not a new feat; rather, operations have been occurring in the Arctic OCS for decades.

AIO is confident that as BOEM continues their analysis they will recognize the abundance of data and traditional knowledge that supports continued operations in the Arctic OCS. It is disheartening the lack of traditional knowledge incorporated in the Programmatic EIS. Traditional knowledge is an essential piece of successful operations on the North Slope and in the OCS. It is the nexus of the Iñupiat people and industry. When incorporated into Arctic oil and gas development projects and into the assessment of these projects, it can improve operating practices, safety protocols, marine mammal protection, and emergency and environmental response systems. AIO has attached to this letter a list of evidence of traditional knowledge, prior NEPA reviews, ongoing monitoring and research for BOEM's convenience to address their concerns for lack of environmental information.

In response to BOEM's concern for conflict to subsistence use, we appreciate the level of sensitivity that BOEM and operators have shown to our subsistence way of life. AIO considers potential impacts closely as it is the Iñupiat people who will feel the potential impacts which BOEM assesses; however, we have seen operation in the OCS conducted with existing mitigation measures that demonstrate oil and gas operations and subsistence can coexist. The current collaboration between whalers and industry, along with existing mitigation measures provide a conduit to establish a common purpose of protecting subsistence use while accommodating industry activities. The presence of these management techniques, such as the Conflict Avoidance Agreement (CAA), Subsistence Advisers (SAs), Community Liaison Officers (CLOs), and Protected Species Observers (PSOs) are not fully characterized throughout BOEM's analysis. BOEM neglects to acknowledge that co-existence is a reality of activities in the OCS and is already occurring.

AIO would like to emphasize that Arctic exploration is not a new concept and has been occurring in the U.S. Arctic waters for over 50 years; most recently, Shell conducted a safe and successful exploration program in the Chukchi (2015) and the Beaufort (2012). Additionally, Hilcorp Alaska, Inc. (Hilcorp) currently operates Northstar Island, and has submitted plans for a second artificial island in the OCS (See Liberty Drilling and Production Island DPP, 2015). Exploration in arctic conditions has been occurring since the 1920s, with early U.S. Arctic offshore exploration beginning in 1969. The National Petroleum Council (NPC) report, *Arctic Potential*, which analyzed U.S. Arctic potential and capability to develop the OCS, concludes that existing technology is currently available to develop the arctic, and although the arctic presents some unique challenges it is generally well understood. Existing infrastructure and technology are available to safely explore and develop the OCS; AIO witnessed this to be the case during Shell's Exploration Program. Though the Arctic does not possess the level of infrastructure as seen in the Gulf of Mexico, AIO does not see this as a disadvantage but as an additional reason to support OCS development. An investment in the region would stimulate economic opportunity across the region and stimulate our existing infrastructure, such as the Trans-Alaskan Pipeline

System (TAPS) which is currently running at 25% capacity. BOEM should fully consider the legacy of Arctic operations, the abundant traditional knowledge and baseline data which evaluates potential impacts closely.

While AIO appreciates BOEM's close concern for environmental information, subsistence use needs, and infrastructure capabilities, these concerns do not necessitate late Arctic Lease Sales. AIO is weary that positioning the Arctic Lease Sales at the end of the Proposed Program demonstrates a lack of commitment from BOEM to Arctic OCS development. AIO does not support this course. During a time of low oil prices, declining production on the North Slope, TAPS operating at 25% capacity, and a State budget deficit, AIO regards the OCS as a potential boon to our local and State economy. With respect to environmental issues and infrastructure concerns, AIO calls to mind the long history of safe operations. AIO is confident that Arctic OCS exploration can occur safely and with manageable impacts to the environment. While AIO appreciates BOEM's careful consideration of the Arctic Lease Sales, the concerns BOEM articulates do not necessitate the late Arctic Lease Sales.

Potential Impacts

AIO appreciates the extensive analysis conducted by BOEM on impacts expected from the Proposed Program. BOEM's thorough review provides a basis for AIO to analyze potential impacts and offer our comments based on our experience with oil and gas operations, our history of traditional knowledge, and our intimate understanding of the potential impacts and potential solutions. Many of the potential impacts which BOEM assesses are not new to AIO or to the Iñupiat people but are indicative of activities we have been successfully managing for decades. These operations have been occurring in our waters and in our lands for generations, and we have learned how to balance our Iñupiat way of life while sustaining the economic stability of our communities. We understand the potential impacts well, as it is we who will feel them most closely, but we also understand that safety measures and mitigation, supported by traditional knowledge and science, exists to prevent adverse impacts.

Subsistence

AIO is intimately aware of the social and cultural importance of subsistence whaling as it is the Iñupiat people whom are the whalers that will potentially be impacted; however, AIO is also aware of the abundant data and traditional knowledge that supports existing mitigation measures and provides a balance between subsistence and industry activities. The working collaboration between whalers and industry is an integral piece to successful operations and the bowhead whale hunt. AIO does not regard subsistence and OCS exploration as mutually exclusive activities; rather, each essential in sustaining the Iñupiat people. AIO does not have the luxury to consider these potential impacts blindly, but must

consider them in the context of a history of successful mitigation measures and the economic longevity of our communities.

AIO is confident that with tools such as the existing CAA, traditional knowledge, SAs, PSAs, and other design measures that impacts to subsistence can be mitigated or avoided. Industry has shown a history of willingness to work with the Iñupiat people and define appropriate measures to reduce impacts. AIO calls to mind BOEM's own ongoing analysis through their Continuation of Arctic Nearshore Impact Monitoring in the Development Area (cANIMIDA) which evaluates potential industry disruption to the Cross Island whale hunt, among other things. AIO notes that in decades of observing potential impacts to the bowhead whale hunt, in the 2001-2007 report, observations made were consistent with AIO's statements: "What has become clear from an examination of seven field seasons of data is that, at least during the period of study, there does not appear to be any clear way to test for (**or demonstrate**) any adverse effects of oil and gas activities on the Cross Island subsistence whaling" [Emphasis added] (Galginaitis 2008)¹. This conclusion is supported by both Michael Galginaitis' previous and sequential observations. AIO also notes the Galginaitis report prepared to assess the Hilcorp propose Liberty Project, a proposed artificial development island in the Beaufort OCS. In his report, *Subsistence and Traditional Land Use Patterns*, which is based on decades of observing potential impacts to the Cross Island hunt, he concluded, "While many or perhaps all of these potential effects could possibly be mitigated or eliminated through coordination between whalers and industry, primarily through the CAA process, this will require a continued effort on the part of all parties and may require different mitigation than in the past" (Galginaitis 2015)². Ongoing studies evaluate the potential impacts closely and indicate that existing mitigation measures are successful at managing impacts. AIO recognizes that the Iñupiat people and industry have tools in place to manage this coexistence successfully.

AIO does not consider these potential impacts lightly, but weighs them mindfully in the context of traditional knowledge and mitigation measures. Given extensive science, a successful CAA process, existing mitigation measures and BOEM's own ongoing studies, AIO maintains that impacts to bowheads and subsistence will be manageable. AIO is fully aware of the potential impacts, as well as the wealth of information which offers solutions to adverse impacts. Through the use of traditional knowledge, decades of collaboration, and ongoing communication with the communities, mitigation measures can manage adverse impacts to the bowhead whale migration and the subsistence hunt.

Acoustic Environment

¹ Galginaitis, Michael. (2009). *Annual Assessment of Cross Island Whaling, Final Report 2001-2007*. Retrieved from BOEM/MMS2009-0038.

² Galginaitis, Michael. (December 2014). *Subsistence and Traditional Land Use Patterns*. Retrieved from Liberty Development and Production Plan Attachment 2.

AIO is particularly cognizant of the potential acoustic impacts which, as BOEM assesses, have the potential to disrupt the bowhead whale migration. AIO regards this potential impact closely as any disruption to the bowhead whale migration could jeopardize the success of the subsistence hunt and have adverse impacts to the communities. AIO appreciates BOEM's close analysis of this issue and respectfully requests that BOEM consider acoustic monitoring programs from Shell, BP, and Hilcorp which can assist in assessing these potential impacts.

AIO notes that in BOEM's analysis they evaluate sounds emitted from ice breaking activities as well as seismic, decommissioning, and drilling activities as at-risk activities for impacting the migration. Of these, seismic and drilling activities are the most relevant for disrupting the migrations as exploration activities would occur in the open water season and would not necessitate ice-breaking activities. Additionally, the existing CAA has mitigation measures already incorporated to manage potential impacts from seismic and drilling operations. Furthermore, as an outcome of the Camden Bay Science Initiative, a collaboration between industry and whalers to determine potential impacts to bowheads and potential solutions, it was determined that anchor setting activities was actually the greatest source of sound and drilling activities weren't as disruptive as previously thought. Effects from anchor handling can be limited during an exploration program and can be managed with the help of local SAs and PSOs to limit impacts to marine mammals.

Additionally, AIO notes that in BOEM's analysis they state that thresholds for sounds disruption of bowheads is not fully understood (pg 138); AIO offers some information to help guide BOEM in this assessment as this is an area which has been carefully analyzed by industry monitoring programs, aerial observations, and research. BOEM states that with respect to acoustic impacts, "There is no set pattern to when one or another potential impacts will occur." AIO encourages BOEM to analyze the abundant monitoring data which has analyzed industry activities with respect to bowheads during exploration and development operations; both Marine Mammal Mitigation and Monitoring Reports (4MPs) and ongoing data collected from Northstar could provide information to assess these impacts. Additionally, AIO notes that in Dr. Susan Blackwell et al. article, *Effects of Airgun Sounds on Bowhead Whale Calling Rates: Evidence of Two Behavioral Thresholds*³, this very threshold is discussed based off data gathered in the Beaufort Sea Area. The results of this study indicated that two thresholds existed from which bowheads reacted, at a 97-127 dB range calling rates remained the same, and at a 127 – 160 dB range calling rates begin to decline until ceasing at 160 dB. This information is understood by AIO and industry operators and is utilized to adjust sound levels to mitigate impacts.

³ Blackwell SB, Nations CS, McDonald TL, Thode AM, Mathias D, Kim KH, et al. (2015) *Effects of Airgun Sounds on Bowhead Whale Calling Rates: Evidence for Two Behavioral Thresholds*. PLoS ONE 10(6): e0125720. doi:10.1371/journal.pone.0125720

AIO is pleased with the level of information gathered and utilized thus far in oil and gas operations in the Arctic to address this concern. The collaboration between industry and whalers provides a means to weave traditional knowledge and scientific studies together to create a toolbox of techniques to arrive at mutually beneficial coexistence.

Other Impacts

While impacts to subsistence and the bowhead whale migration are of the utmost importance to AIO and the Iñupiat people, AIO continues to analyze other potential impacts. Many of the additional impacts which BOEM assesses, including impacts to water quality through sedimentation or discharge, impacts to the marine benthic community, impacts due to infrastructure, and other wildlife are of deep consideration to AIO. AIO is pleased that these impacts continue to be studied and, through the working collaboration between the Iñupiat people and industry, protecting the environment remains a key piece to successful operations in the Arctic. Through the legacy of operations in the Arctic, AIO is confident this culture can continue.

Economic Impacts

AIO urges BOEM to highly consider to vast economic potential of the Arctic OCS. Exploration and development of the Arctic OCS represent a significant investment in the local North Slope, Alaskan, and national economy. In an environment of low oil prices, declining production on the North Slope, TAPS operating at 25% capacity, and a multi-billion dollar State budget deficit, development of the Arctic OCS signifies an investment in our region, State, and Nation.

The investment potential of the Arctic OCS would reverberate across the Arctic, Alaska, and the U.S. BOEM critically notes the limited infrastructure in the Arctic; AIO would like to note this as well in comparison with our neighboring Arctic nations. The Alaskan Arctic is a stark contrast with some of the neighboring Arctic nations. Oil and gas activities could stimulate this development which would contribute to the U.S. Arctic remaining viable and competitive with the neighboring nations. Examples of infrastructure which the oil and gas industry may stimulate are: an Arctic deep-water port, increased rescue capability, and onshore infrastructure. AIO is encouraged by the Arctic remaining a part of the Proposed Program and looks forward to the realization of this investment.

Additionally, development of the Arctic OCS would provide economic benefit across the local, state, and national governments. Ninety percent of the local government, North Slope Borough (NSB), is contrived from taxation and royalties from oil and gas activities. The NSB then provides all the essential services to the local communities. During the decline in onshore production, an influx from OCS development could continue to sustain the NSB and the communities. Similarly, increased throughput is critical for the longevity of TAPS, a

key piece of national infrastructure. OCS development is essential to sustain TAPS and the Alaskan economy. Furthermore, the U.S. would benefit from increased production, national security, and energy independence.

AIO respectfully requests that BOEM fully consider the direct and indirect benefits from Arctic OCS development. Both the jobs and wages generated from Arctic OCS development would reverberate across the State. Whether through direct services, or through the supply chain, Arctic OCS development represents a significant employment opportunity which should be fully realized in the Programmatic EIS.

Alternatives

AIO appreciates BOEM conducting their due diligence as required by NEPA to propose alternatives to the Proposed Program; however, AIO supports Alternative A: The Proposed Program, and does not support conditions in Alternative B, particularly the Environmentally Important Area (EIA) designations. AIO views the designations of these areas in the Beaufort and the Chukchi Seas as overly prescriptive and not justifiable. AIO is concerned that designating these areas will seriously reduce the economic viability of future exploration programs and does not provide significant added environmental benefit. AIO maintains that with proper mitigation measures in place, traditional knowledge, and coordination with the local communities that many of the potential impacts to the Arctic OCS can be minimized or avoided throughout the OCS and in these EIAs.

The EIAs proposed for the Beaufort Sea encompass areas of significant resource potential and activities can be safely managed. The areas which BOEM proposed include exclude 26% of the known geological play acreage, many of which has already been explored safely. BOEM proposed areas in Camden Bay, Cross Island, Barrow Canyon, and Kaktovik for exclusion, permanent or temporary. AIO would like to emphasize that Camden Bay and Cross Island areas have already experienced oil and gas activities with minimal impacts (See ANIMIDA or cANIMIDA studies). AIO would like to highlight that the area proposed as an EIA for the Cross Island area includes the Liberty Project for which Hilcorp has proposed to develop an artificial island to develop the Liberty Reservoir; a project which has been studied for decades. AIO respectfully recommends that BOEM include the decades of data from MMS, BOEM, and other regulating entities which evaluate oil and gas activities in these proposed EIAs and concluded that impacts would be manageable. The existing Kaktovik exclusion by Presidential Order does not necessitate expansion at this stage. AIO respectfully advises that the Director refrain from designating these EIAs at the Programmatic stage as there is not sufficient cause to warrant such a swathing designation which would have detrimental implications on the potential of this Program.

Similarly, the proposed Chukchi Sea proposed EIAs would exclude 34% of the geological play acreage with no added benefit to the environment. Expanding the already designated

areas of the Hanna Shoal Walrus Use Area (HSWUA) and the Coastal Buffer are not appropriate at the programmatic stage and do not provide added environment benefit. AIO witnessed Shell conduct safe exploration activities in the very area which BOEM plans to designate. AIO does not support these designations and does not see them as an added benefit to our region; rather, the designation of the Beaufort and Chukchi EIAs limit the potential of safe and responsible resource development in our region which would have detrimental effects to the Iñupiat people.

AIO sees the designation of these EIAs as overly prescriptive and inappropriate at this stage of the leasing program. The economic potential of the Arctic OCS is enormous and could be a significant factor in the economic stability of the Iñupiat people and the local communities for the future. Many of the areas proposed by BOEM have already experienced safe and responsible resource development with appropriate mitigation measures. AIO is confident that this legacy can continue with traditional knowledge, collaboration with the local peoples, and scientific research to establish the appropriate mitigation measures; many of BOEM's ongoing studies conclude that impacts are manageable.

Traditional Knowledge

AIO appreciates BOEM's efforts in their analysis and their close consideration of the Arctic environments; however, AIO is discouraged by the lack of traditional knowledge incorporated into the EIS. Traditional knowledge has sustained the Iñupiat people for a millennia and, when combined with oil and gas activities, can contribute to increased environmental protection, safety measures, and infrastructure design measures. The wealth of this knowledge should be incorporated in the EIS. AIO is concerned that the representation of the Arctic OCS in the Programmatic EIS seems to convey that not much is known about the Arctic; this is incorrect. The Iñupiat people have been careful observers and stewards of this environment for generations, and western science has conducted research for decades. AIO encourages BOEM to investigate the breadth of this data which we have included for BOEM's convenience. AIO encourages BOEM to incorporate the NEPA reviews, traditional knowledge, and ongoing research in their EIS which AIO has attached to this letter.

NPC Report Recommendations

AIO reiterates some of the conclusions from the National Petroleum Council Report: Arctic Potential, which provides good information about operations in the Arctic which BOEM should consider in their review. AIO is aligned with these conclusions and looks forward to BOEM incorporating them into their review in order to be scientifically sound, environmentally practical, and aware of the legacy of operation in the Arctic.

- NPC recommends longer lease terms in the Arctic to account for seasonal restrictions and to explore in the most efficient and safe manner. BOEM should consider this alternative in their analysis.
- NPC concludes that existing technology is available to conduct safe and responsible resource development in the Arctic. BOEM should fully consider this long history and the technology currently available.
- NPC concludes that while the Arctic presents unique factors, it is widely understood and within the capacity of the industry. BOEM should fully consider the breadth of information which has been collected analyzing the Arctic and the potential impacts which have been closely mitigated and monitored.

Conclusion

AIO appreciates BOEM conducting their due diligence required by NEPA and looks forward to our comments being incorporated into the Programmatic EIS. AIO is supportive of Alternative A: the Proposed Program. AIO maintains that exploration and development of the Arctic OCS can be done safely and with manageable impacts and looks forward to the investment in our region. AIO looks forward to the breadth of traditional knowledge, ongoing studies, NEPA reviews, and the NPC report being fully incorporated into the BOEM's review. AIO does not support designation of the EIAs which would result in limits to Arctic opportunity and discourage exploration and development. In a time of low oil prices, declining onshore production, low throughput into TAPS, and a State budget deficit, AIO looks forward to the boon which Arctic OCS offers.

AIO may submit subsequent comments within the two week window which BOEM has allowed to AIO. It is AIO and BOEM's understanding that due to the level of detail included in the Programmatic EIS and the importance of a close review by local stakeholders that a two week window would be available for AIO and other key stakeholders to submit additional comments. AIO reserves this option as explained by James Kendall, Alaska Region Director. We appreciate the opportunity to comment on BOEM's Programmatic EIS and thank BOEM in advance for considering our comments.

Sincerely,



Teresa Imm
General Manager

Attachment—List of Studies on the Arctic OCS