Appendix P

Section 106 Programmatic Agreement Documentation

- Re-Initiation letter from Corps to SHPO, December 20, 2010
  - Figure 1: Area of Potential Effect
  - Figure 2: APE Detail
  - Initial letter from Corps to SHPO, March 24, 2010

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, ALASKA
REGULATORY DIVISION
P.O. BOX 6898
ELMENDORF AFB, ALASKA 99506-0898

REPLY TO
ATTENTION OF:

DEC 3 0 2010

Regulatory Division
POA-2001-1082-M1

Ms. Judith Bittner
Alaska Department of Natural Resources
Office of History and Archeology
550 West 7th Avenue, Suite 1380
Anchorage, Alaska 99501-3561

Dear Ms. Bittner:

The U.S. Army Corps of Engineers, Alaska District, Regulatory Division (Corps) is preparing an Environmental Impact Statement (EIS) in response to a draft Department of the Army (DA) permit application received from Exxon Mobil Corporation (Exxon Mobil) for their Point Thomson Project. The draft application included requests for authorization under Section 10 of the Rivers and Harbors Act (RHA) and Section 404 of the Clean Water Act (CWA). Exxon Mobil supplemented their draft permit application with a Project Description document. Both October 2009 documents have been provided to other Federal, State, and local agencies as part of a pre-application and National Environmental Policy Act (NEPA) processes. The purpose of the project is to produce natural gas condensate and oil resources.

The Point Thomson Project is located on the North Slope of Alaska, approximately 60 miles west of Kaktovik, on the coast of Lion Bay, and is named after a local geographic landform called Point Thomson. The Federal project area for the EIS is defined to include all facilities and access roads being part of the range of reasonable alternatives being considered in the EIS. Because of a lack of recognizable landmarks in the area, the Federal project area is roughly defined to extend eastward from Deadhorse to the Staines River and from the lagoon side of Flaxman Island and the Maguire Islands along the Beaufort Sea coast south to approximately eight miles south of the coast line. Please see the enclosed Figures 1 and 2.

For purposes of the National Historic Preservation Act (NHPA), this letter follows our initial NHPA consultation letter submitted to your office on March 24, 2010 (copy enclosed). The description below includes current project details so the consulting parties can assist us in identifying historic properties which may be affected by the proposed project.

The Area of Potential Effect (APE) for the Point Thomson Project has been identified as the furthest extent of the range of reasonable alternatives developed for analysis within the EIS. The APE thus encompasses direct project footprints and potential indirect effects, extending 48 miles east-west, and 17 miles north-south.

All project components (described in detail below) would be constructed within the area identified in Figure 1. "Action areas" within the broader APE encompass ½ mile zones to allow for the placement of potential pads and airfields, and ¼ mile zones around potential roads (both ice and gravel).

The EIS reasonable range of alternatives includes five scenarios:

- **Alternative A: No Action**

  Alternative A would involve completing and capping the existing Central Pad Point Thomson Unit (PTU) #15 and #16 production and injection wells, respectively. During one season of summer barge access and one season of winter ice road access, Exxon Mobil would completely demobilize everything else from the Central Pad. Exxon Mobil would also continue to send personnel to the site periodically to monitor the capped wells.

- **Alternative B: Applicant's Proposed Action**

  Alternative B would develop a minimum of 5 production wells on 3 gravel fill pads (Central, East, and West) to extract mostly offshore resources by directional drilling into the Thomson Sand Reservoir. Also included is construction of: 1) a 22-mile long above-ground export pipeline from Point Thomson to BP's existing Badami Production Facility to the west; 2) a 5,600 ft. runway with associated facilities; 3) a marine bulkhead; 4) 5 mooring dolphins, 5) a 120-ft.-long pile-supported dock with six vertical piles; 6) 12 miles of in-field gravel roads; 7) a 60-acre gravel mine; 8) 10 miles of in-field pipelines; 9) a multi-year ice pad; 10) a small fill at Badami; 11) communications towers; and 12) navigational dredging. A natural gas re-injection well, production wells, and processing facilities would be co-located on the Central Processing Pad. The development would use summer barging and winter ice roads to move equipment to and from Point Thomson and Prudhoe Bay, both during construction and ongoing operations.

- **Alternative C: Inland Pads with Gravel Access Road**

  Alternative C involves moving some facilities away from the Beaufort Sea coast to minimize seacoast and near-shore impacts. This alternative would consist of a minimized coastal pad (12 acres) for the existing PTU #15 and #16 production and injection wells, locate two well pads (19 acres) approximately one-half mile inland from the seacoast, and locate a central processing pad (36 acres) approximately 2 miles inland from the coast (for a total of four gravel pads). There would be no summer barging during either construction or operations. During project construction, equipment would be transported to the site via ice roads. Initial construction would include a 44-mile permanent gravel road from the existing Prudhoe Bay infrastructure to Point Thomson. This permanent road would not be usable during construction, but would allow year-round access to Point Thomson for the life of the field.

This alternative would include 17 miles of in-field gravel roads connecting each of the pads and a 5,600-ft. gravel airstrip. A 48-acre gravel mine would supply gravel for all in-field roads and pads. The above-ground pipeline would follow the route of the all-season gravel road and tie into the Endicott pipeline.

- **Alternative D: Inland Pads with Ice Access Road**

  Alternative D is similar to Alternative C, except there would be no construction of an all-season gravel road from Prudhoe Bay to Point Thomson. Instead, ExxonMobil would use a seasonal ice road to move supplies and equipment from Prudhoe Bay to Point Thomson for the duration of the field life. Because of the lack of a permanent gravel road, the above-ground export pipeline (22 miles) would tie-in at Badami, rather than Endicott, and use existing common-carrier pipelines to transport hydrocarbons to the Trans Alaska Pipeline System.

- **Alternative E: Coastal Pads with Mostly Seasonal Roads**

  Alternative E would minimize permanent infrastructure at Point Thomson. The East and West Pads (12 acres of gravel and 10 acres of multi-seasonal ice) would be for production drilling and the Central Pad (73 acres) would combine wells and processing. An inland airstrip would be shorter (3,700 ft.), to accommodate a DeHavilland Twin Otter personnel transport plane, and be supplemented by an ice air strip to accommodate a C-130 during the hydrocarbon drilling season between January and April. The Central Pad and airstrip would be connected year-round by a gravel road (2 miles). Roads between the Central Pad and the East and West Pads would be seasonal ice roads (10 miles). A seasonal ice road and summer barging would be used to transport equipment and supplies to and from Point Thomson. The export pipeline (22-miles) would be above-ground, and would tie-in at Badami.

We will soon contact you to schedule consultation meetings with you and other interested parties to discuss the APE and further coordination.

If you need further detailed information regarding the above five EIS Alternatives, have questions or comments, please contact me at the address above, by calling my office phone at 907-753-2784, my cell phone at 907-350-5097, or by e-mail message at harry.a.baij@usace.army.mil. Your timely response will assist us in incorporating your concerns into the EIS.

Sincerely,

H. Baij

Harry A. Baij Jr.
Project Manager

Enclosures

POINT THOMSON PROJECT EIS

Existing Conditions
- Arctic National Wildlife Refuge
- Oil and Gas Development Unit
- Facilities
- Pipeline
- Road

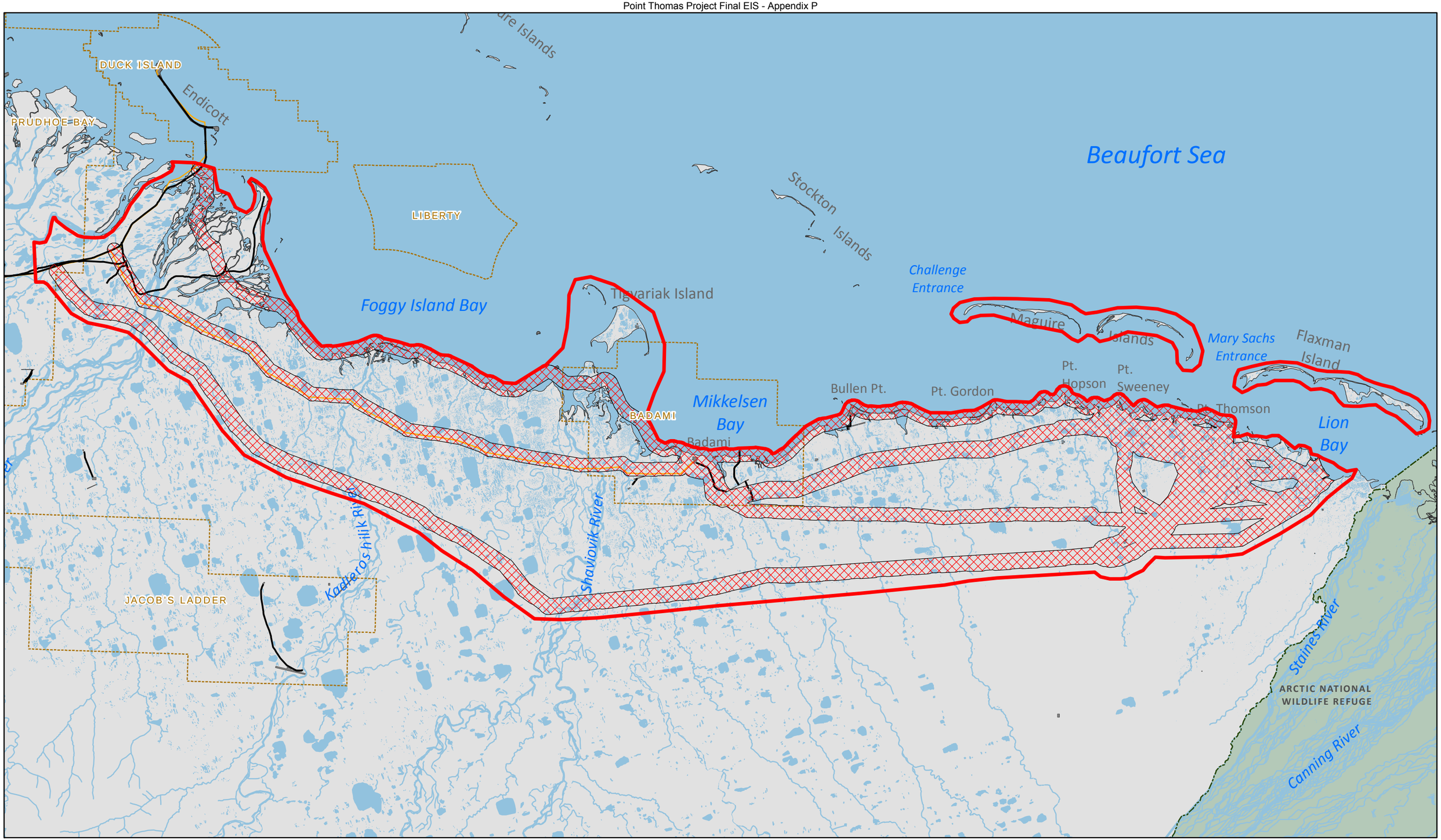
Project Areas
- Area of Potential Effect (APE)

0 25 50 Miles

N

Figure 1
Area of Potential Effect

Date: 3 October 2010
Map Author: HDR Alaska Inc.
Sources: USGS, Alaska DNR, URS, HDR



POINT THOMSON PROJECT EIS

Existing Conditions
- Arctic National Wildlife Refuge
- Oil and Gas Development Unit
- Facilities
- Pipeline
- Road
- Water Body

Project Areas
- Area of Potential Effect (APE)
- Alternatives Action Areas

0 4 8 Miles

N

Figure 2
APE Detail

Date: 22 November 2010
Map Author: HDR Alaska Inc.
Sources: ExxonMobil 2009; PND Engineering 2009; USFWS 2009; BP Exploration 2008, 2009; Alaska DNR 2009; ESRI 2009; NHD 2009; OASIS 2001; HDR 2010

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ELMENDORF AFB, ALASKA 99506-0898

REPLY TO
ATTENTION OF:

MAR 24 2010

Regulatory Division
POA-2001-1082-M1

Ms. Judith Bittner
State Historic Preservation Officer
Alaska Office of History and Archeology
550 West 7th Avenue, Suite 1380
Anchorage, Alaska 99501-3561

Dear Ms. Bittner:

This is in regard to ExxonMobil's proposed Point Thomson Project, which would develop the Thomson Sand Reservoir. The proposed project would include construction and operation of facilities in an area approximately 60 miles east of Deadhorse and 22 miles east of the existing Badami Operations on the Beaufort Sea coast, in the state of Alaska. We are reviewing this project pursuant to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act of 1899. For purposes of Section 106 of the National Historic Preservation Act, we are initiating this consultation to identify historic properties that may be affected by the proposed project.

Enclosed please find one copy of ExxonMobil's Project Description, Point Thompson Project, North Slope, Alaska, dated October 2009. The proposed Point Thomson Project would include three pads, a new 22-mile long, elevated pipeline, a gravel airstrip, a bulkhead and dolphins, in-field gravel roads, ice roads, in-field pipelines, and a gravel mine. Should you have comments or concerns regarding the Project Description, your timely response would be greatly appreciated.

In accordance with the National Environmental Policy Act, an Environmental Impact Statement is being developed for this project and alternatives are currently being refined. Once we have formalized the alternatives, we hope to continue discussions with you to determine the best way forward to identify any effects the proposed project may have on historic properties, and to consult on the Area of Potential Effect (APE). The APE will be defined after comments are received from your agency and other consulting parties.

You may contact me via email at julie.w.mckim@usace.army.mil, by mail at the address above, by phone at (907) 753-2773, or toll free from within Alaska at (800) 478-2712, if you have questions.

Sincerely,

Julie W. McKim

Julie W. McKim
Project Manager

Enclosure