Appendix W

Draft EIS Comments and Responses

Point Thomson Project EIS – Draft EIS Comment Period Summary

The Draft Environmental Impact Statement (EIS) was posted on the project Web site November 8, 2011. Sections available to the public online included:

- Executive Summary
- Table of Contents
- Chapters 1-11
- Appendices A-U

A 45-day comment period for the Draft EIS began November 18, 2011 with the publishing of the Notice of Availability in the Federal Register. The end of comments was originally scheduled for January 3, 2012, but requests were submitted to extend the comment period. On December 22, the U.S. Army Corps of Engineers (Corps) announced a 15-day extension, moving the close of the comment period to January 18, 2012. The public notice for the 404 permit also was announced and ran concurrently with the Draft EIS comment period.

Approximately 60 copies of the Draft EIS Executive Summary (with CDs containing the Draft EIS and appendices) were sent to parties on the mailing list. Sixteen print copies of the complete Draft EIS (with appendices) were also sent to certain agencies that requested full printed copies. Copies of the Executive Summary were made available at public meetings. In addition, public meetings were followed up by the distribution of requested copies of the visual simulation CD.

PUBLIC COMMUNICATION

In addition to a Federal Register notice, announcements of availability and meeting notices were published in the newspapers shown in Table 1.

Table 1: Notice of Availability Published

Publication Date	Venue
November 9, 2011	*Anchorage Daily News*
November 9, 2011	*Fairbanks Daily News Miner*
November 10, 2011	*Arctic Sounder*
November 13, 2011	*Petroleum News*

The project team used a variety of ways to inform the public of project updates and meetings:

- Public service announcements were provided on local radio stations
- Community flyers were posted
- The *What's Up* email distribution list was used to distribute a comment period announcement
- Email notifications were sent to the project's mailing list.

Table 2 provides a list of when and where public open houses, meetings, and the project Web site were advertised.

Table 2: Advertisements and Announcements	
Publication Date	Venue
November 13, 2011	*Fairbanks Daily News Miner*
November 24, 2011	*Arctic Sounder*
	Public Service Announcements
	What's Up email distribution list
	Community flyers in the villages of Kaktovik, Nuiqsut, and Barrow
November 28, 2011	*Anchorage Daily News*
November 29, 2011	Email to agency mailing list

Newsletter

The Draft EIS was introduced through a newsletter, which also announced the public open house meetings associated with the NEPA process. The four-page newsletter provided a description of the NEPA steps and how to comment on the Draft EIS. It was distributed by mail to a list of approximately 585 individuals on December 9, 2011. Copies of the newsletter were made available at public meetings and posted on the project Web site.

Topics covered in the newsletter included:

- Public meetings announced
- How to submit effective NEPA comments
- The NEPA process
- Project simulation available to view during the public meetings and on the Web site
- The review schedule
- December public meetings
- Call for public involvement
- Contact information

MEETINGS

During the Draft EIS comment period, public meetings were held that were open to everyone. The Corps met separately with tribal representatives and also had meetings with state and federal agencies.

Public Meetings

Five public open house meetings were held in December 2011. The Corps identified the villages of Kaktovik, Nuiqsut, and Barrow for public meetings because of the proximity to the proposed development area and potential for outreach to potentially impacted parties. Anchorage and Fairbanks were included because of the statewide interest in developing the project and potential indirect effects on

these communities, as well as to maximize efforts to engage the federal and state agencies in these communities.

Table 3: Public Meetings

Date	Location	Number of Participants	Number of Testifiers*
December 5, 2011	Z.J. Loussac Library, Anchorage	90	30
December 7, 2011	Wedgewood Resort, Fairbanks	60	18
December 12, 2011	Marsh Creek Inn, Kaktovik	25	0
December 13, 2011	Trapper School, Nuiqsut	10	1
December 15, 2011	Hopson Middle School, Barrow	25	2

* Some people who testified did so more than once.

The format for the public meetings was an open-house informational opportunity with poster displays, followed by the Corps' presentation of the environmental review process and an audio-visual presentation of the proposed project by the Applicant. These meetings provided opportunity for the public to make comments and ask questions with responses from the Corps, the Applicant, and associated entities. An on-site court reporter transcribed the comments, questions, and responses. An Inupiaq language translator was provided in Nuiqsut and Barrow to facilitate questions and comments.

Comment forms were available for submission of written comments at the meeting or for submission via mail at a later time. Copies of informational handouts distributed at the meeting are included as an attachment to this appendix.

Twenty-two posters were printed and taken to all eight meetings. The posters detailed the commenting process as well as the meeting agenda and had information about many specific components of the Point Thomson project.

Included in the Corps presentation at both the public and agency meetings was a demonstration and explanation on how to use the computer simulation model and its applications, which could be found on the project Web site (www\pointthomsonprojectEIS.com).

Tribal Government Meetings

The Corps met with the tribal governments listed in Table 4 to discuss the Draft EIS and explain the comment process. The Corps Project Manager met with tribal council members of the Native Village of Kaktovik, Native Village of Nuiqsut, and Iñupiat Community of the Arctic Slope to distribute printed copies of the Executive Summary and CD copies of the computer simulation model.

Table 4: Tribal Meetings

Date	Tribal Government Meetings	Location	Attendees
December 12, 2011	Native Village of Kaktovik (NVK)	NVK office	HDR, USACE, NVK
December 14, 2011	Native Village of Nuiqsut (NVN)	NVN office	USACE, NVN
December 15, 2011	Inupiat Traditional Government Native Village of Barrow (NVB)	NVB office	HDR, USACE, NVB
December 16, 2011	Iñupiat Community of the Arctic Slope (ICAS)	ICAS office	HDR, USACE, ICAS

The Corps Project Manager also met with members of the Native Village of Barrow at their tribal office. Specific comments from NVB focused on the need to receive project information in a timely manner, concern relating to the Department of Interior, Bureau of Indian Affairs not being a Cooperating Agency, concern for native allotments, concerns related to the comment deadline, and interest in being part of the Section 106 consultation process.

Agency Meetings

The U.S. Environmental Protection Agency (EPA), the U.S. Fish and Wildlife Service (USFWS), and the Alaska Department of Natural Resources (ADNR) Office of Project Management and Permitting serve as cooperating agencies for the Point Thomson Project EIS. The Corps also invited agencies with regulatory jurisdiction over land development, and/or permitting to participate in the scoping process. Participating agencies included:

- Alaska Department of Environmental Conservation (ADEC)
- Alaska Department of Fish and Game (ADF&G)
- Alaska Department of Health and Social Services (ADHSS)
- North Slope Borough (NSB)

Three agency meetings were held to discuss the Draft EIS, review the range of alternatives, and to share the project computer simulation model. The locations for the meetings were selected in an effort to maximize the agency participation. Table 5 lists dates, locations, and participants for the agency meetings. The Corps requested agencies to submit formal scoping comments in writing but also provided a question and answer period during the meetings. Official agency comments can be reviewed in the Comment /Response section of this appendix. In addition, some agency representatives attended and commented at the public meetings.

Table 5: Agency Meetings

Date	Location	Agencies Attending
December 5, 2011	HDR Office, Anchorage	EPA, ADNR, ADEC, ADHSS
December 7, 2011	Wedgewood Resort, Fairbanks	EPA, ADNR, ADFG, ADEC, USFWS, ADHSS
December 14, 2011	Ilisgavik College, Barrow	EPA, ADNR, ADFG, ADEC, USFWS, NSB

COMMENTS RECEIVED

As shown in Table 6, comments came in different formats. Comment documents contained anywhere from 1 to over 100 individual comments. The individual comments were categorized to facilitate the response process.

Table 6: Comment Documents Received

Format of Comment	Number Received
Letter	43
Public meeting transcript	62
Email (direct to Corps)	16
E-filing (via Web site)	118
Comment form	8
Total	247

Table 7 is a list of categories and the number of individual comments received within that category. A total of 666 individual comments were recorded.

Table 7: Comments Received by Category	
Comment Category	Number Received
Air Quality	13
Alternatives / Project Description	42
Arctic Refuge	42
Birds	10
Contaminated Site and Spills	23
Cultural Resources	10
Cumulative Impacts	15
EIS General	17
Environmental Justice	7
Fish and Invertebrates	25
Human Health / HIA	6
Hydrology	20
Land Use, Ownership, Management	13
Marine Mammals	24
Mitigation	14
Noise	7
Not a Comment on the EIS	14
Permits and Coordination	3
Physical Oceanography / Coastal Processes	2
Purpose and Need	5
Recreation	19
References	3
Socioeconomics	3
Statement of Opposition	1
Statement of Support	223
Subsistence and Traditional Land Use	26
Terrestrial Mammals	14
Vegetation and Wetlands	19
Visual Aesthetics	34
Waste Management	3
Water Quality	9
Total	666

Table 8 lists the comment documents received, along with information on the commenter and the specific comments in each document, by number.

Table 8: Comments Received by Document Number			
Comment Document Number	Agency, Organization, or Business Name (if applicable)	Commenter Name	Comment Numbers
0001	-	Lorali Simon	94
0002	-	Patrick Egger	96
0003	-	Derek Miller	97
0004	-	Gary Jenkins	99
0005	-	Genevieve Schok	100
0006	-	David McArthur	598
0007	-	Alan Coulter	101, 102
0008	-	Charles Baker	599
0009	-	Michael Miller	104
0010	-	Daniel Anderson	106
0011	-	Jean Public	107
0012	-	Joe Spink	109
0013	-	Kim Skipper	112
0014	-	Wyche Ford	600
0015	-	Annette Stibinski	113
0016	-	Charles Hardman	115
0017	-	Christen Van Treek-Dwiggins	116
0018	-	David Truitt	117
0019	-	Diane Lowe	118
0020	-	Donna Riordan	120
0021	-	Eric Stephenson	601
0022	-	Eugene O'Neal	215
0023	-	Janette Miranda	216
0024	-	Jay Baldwin	217
0025	-	Jeremy Miller	218
0026	-	Kisha Jackson	219
0027	-	Lauren Fleming	220
0028	-	Leona Sprinkle	221
0029	-	Lisa Marquiss	222
0030	-	Nicole Mikes	223
0031	Nave Consulting	Paul Nave	224
0032	-	Peggy Spittler	225

Table 8: Comments Received by Document Number			
Comment Document Number	Agency, Organization, or Business Name (if applicable)	Commenter Name	Comment Numbers
0033	-	Samantha Savage	226
0034	-	Tammi Alexander	227
0035	-	Clyde Carey	228
0036	-	Dan Parrish	229
0037	-	Darald Morgan	230
0038	-	Don Taylor	231
0039	-	Jared Norton	232
0040	-	Ken	233
0041	-	Mike Walls	234
0042	-	Theo McNamara	235
0043	Carlile Transportation	William Ayers, Midwest Regional Manager	236
0044	-	Frances Bowman	237
0045	City of Fairbanks	Jerry Cleworth, Mayor	238
0046	-	Lin Milby	239
0047	-	Lukas Leary	240
0048	-	Shawna Vaivai	241
0049	-	Stan Halvarson	242
0050	-	Cindy Hallum	243
0051	-	Gary Swoffer	244
0052	-	Kevin Sibley	245
0053	-	Ryan Williams	246
0054	-	Jim Plaquet	247
0055	-	Rada Khadijinova	248
0056	-	Adriany Vargas	249
0057	-	Amy Harty	250
0058	-	Bobbie	251
0059	-	Bobby Fontenot	252
0060	-	Brent Petersen	253
0061	-	Carl Trexler	254
0062	-	Cheryl Burns	597
0063	-	Christine McCormick	255
0064	-	Connie Morelos	256
0065	-	David Johnston	257

Table 8: Comments Received by Document Number			
Comment Document Number	Agency, Organization, or Business Name (if applicable)	Commenter Name	Comment Numbers
0066	-	Desiree Doster	258
0067	-	Erica Matich	259
0068	-	Gary Mcconnell	260
0069	-	Harry McDonald	261
0070	-	Jarid Lane	262
0071	-	Judy Chadwick	263
0072	-	Kathleen Graham	264
0073	-	Lane Keator	265
0074	-	Mary Boston	266, 267
0075	-	Matthew Sievert	268
0076	-	Meagan Wright	269
0077	-	Rose Odess	270
0078	-	Sherri	271
0079	-	Tammy Roeder	272
0080	-	Teresa Baty	273
0081	-	Terry Smith	274
0082	-	Tony Vitoff	275
0083	-	Veronica Bykonen	276
0084	-	Vickie Wingate	277
0085	-	William Lanning	278
0086	-	Curt Goodwin	279
0087	Carlile Transportation	Linda Leary, President	280
0088	-	Ryan Groth	281
0089	-	Cassie Sheehan	282
0090	-	Jimmy Goranson	283
0091	-	Mike Desmond	284
0092	-	Rhonda Mellinger	285
0093	-	Steve Duwa	286
0094	Airport Equipment Rentals, Inc	Jon Cook	287
0095	-	Darrell Koontz	288
0096	-	Lee Holmes	289, 290
0097	-	Kirk Jackson	291
0098	-	Onika Brown	292

Table 8: Comments Received by Document Number			
Comment Document Number	Agency, Organization, or Business Name (if applicable)	Commenter Name	Comment Numbers
0099	-	Lance Roberts	293
0100	-	Bill Cessnun	294
0101	-	Ray Powell	295
0102	-	Vera Williams	296
0103	-	Paul Koop	297
0104	-	Thane Fisher	298
0105	State of Alaska	Sean Parnell, Governor	299-405
0106	Alaska State Legislature	Charlie Huggins, Senator, Senate District II	406
0107	Alaska State Legislature	Charisse Millett, Representative, House District 30	407
0108	-	Karl Gohlke	408
0109	ADNR Division of Parks & Outdoor Recreation, Office of History and Archaeology	Judith Bittner, State Historic Preservation Officer	409-417
0110	Arctic Slope Regional Corporation	Richard Glenn, Executive Vice President Lands and Natural Resources	418-421
0111	-	Bill Vivlamore	422
0112	-	Mike Huston	423
0113	-	Kent Patterson	424-425
0114	-	Steve Hickman	426-427
0115	Northern Alaska Environmental Center	Pamela Miller, Arctic Program Director	756
0116	Resource Development Council for Alaska, Inc.	Carl Portman, Deputy Director	428-432
0117	Alaska State Legislature	Anna Fairclough, Representative, House District 17	433
0118	Bureau of Ocean Energy Management, Alaska Region	Deborah Cranswick, Chief, Environmental Analysis Section I	434-435
0119	-	Michelle Holland	436
0120	-	Mark Symonds	437
0121	-	Christina Hollibone	438
0122	-	Judy McClean	439
0123	-	Jodi Dingle	440
0124	-	Elke Joos	441-442

Table 8: Comments Received by Document Number			
Comment Document Number	Agency, Organization, or Business Name (if applicable)	Commenter Name	Comment Numbers
0125	-	Scott Marler	443
0126	-	Shell Schwenn	444
0127	-	John Ellsworth	445
0128	-	Mike Murphy	446
0129	-	Lucas Olive	447
0130	-	David Chaput	448
0131	-	Linda Brown	449-451
0132	-	Brett Ard	452
0133	-	Chris Ledgerwood	453
0134	Alaska Trucking Association	Aves Thompson, Executive Director	92
0135	-	Bill Binford	93
0136	NANA Oilfield Services Company	Brad Osborne, President	95
0137	-	Bryan Clemenz	98
0138	Resource Development Council for Alaska, Inc.	Carl Portman, Department Director	103
0139	-	Charisse Millet	105
0140	Cruz Companies	Dave Cruz, CEO	108
0141	-	David Tetreau	110
0142	SolstenXP	Eric Dompeling, Manager	111
0143	-	Floyd Damron	114
0144	-	Gawain Brumfield	119
0145	NANA Management Services	Ivalu Eric Fox, Vice President of Operations for Camp Services	121
0146	Consumer Energy Alliance and the Governor's Resources, Energy and Environmental Transition Team	Jason Brune, President and Co-chair	122
0147	Udelhoven Oilfield Systems Services	Jim Gilbert, President	123
0148	ADNR	Joe Balash, Deputy Commissioner	124-127
0149	NANA Development Corporation	Joe Mathis, Vice President of External Affairs	128
0150	-	John Shively	129
0151	-	John Sturgeon	130

Table 8: Comments Received by Document Number			
Comment Document Number	Agency, Organization, or Business Name (if applicable)	Commenter Name	Comment Numbers
0152	Alaska Oil and Gas Association	Kate Williams, Regulatory Affairs Representative	133
0153	-	Kenton Braun	134-136
0154	Silver Agency and Allstate Agency	Keith Silver, Owner	138
0155	-	Larry Houle	139
0156	-	Leslie Simmons	140
0157	Alaska State Legislature	Lindsay Williams, representing State Senator Cathy Giessel	141
0158	The Wilderness Society	Lois Epstein, Arctic Program Director	142-144
0159	-	Lorali Simon	606
0160	Hawk Consulting, LLC	Maynard Tupp, Founding Member	145
0161	-	Mila Umanskaya	146
0162	-	Moriah Miles	147
0163	-	David Tetreau	603
0164	-	Kenton Braun	604
0165	-	Jeanine St. John	605
0166	-	Peter Maxie	148
0167	Alaska State Chamber of Commerce	Rachel Petro, President and CEO	149
0168	-	Reed Christensen	150
0169	Anchorage Chamber of Commerce	Sami Glascott	151
0170	-	Steve Connelly	152
0171	Carlile Transportation Systems and Alaska Support Industry Alliance	Tom Hendrix, Vice President of Strategic Business Development and President	153
0172	CH2M HILL	Tom Maloney, Alaska Area Manager	154
0173	-	Zeb Woodman	155
0174	Doyon Associated	Warren Christian, President	156
0175	Faribanks Chamber of Commerce Resource Committee and Pacific Rim Geological Consulting	Tom Bundtzen	157
0176	Laborer's Local 942 and Alaska State District Council of Laborers	Tim Sharp, Business Manager	158-159
0177	-	Shawn Lowry	160-162

Table 8: Comments Received by Document Number			
Comment Document Number	Agency, Organization, or Business Name (if applicable)	Commenter Name	Comment Numbers
0178	-	Scott Eickholt	163
0179	-	Roger Burggraf	164
0180	-	Paul Metz	165-166
0181	Northern Alaska Environmental Center	Pam Miller, Program Director	209
0182	Greater Fairbanks Chamber of Commerce	Lisa Herbert, Executive Director	167
0183	-	Kevin Pomeroy	168
0184	Laborer's International Union of North America, Local 942	John Swortfigeur, Member	169
0185	-	Jim Plaquest	170
0186	-	Jenna Hertz	171-179
0187	-	Doug Isaacson	180-184
0188	-	Diane Shoemaker	185, 210
0189	-	Debbie Miller	186-187
0190	-	Cathy Jones	188
0191	-	Carl Weed	189-190
0192	North Pole Economic Development Corporation	Buzz Otis, Executive Director	191-192
0193	-	Amy Cook	193
0194	-	Vera Williams	194-195
0195	-	Rosemary Ahtuangaruak	211-214
0196	-	Forrest Olemann	196
0197	-	Ernest Nageak	197
0198	-	Ed Nukapigak	198-203
0199	-	Scott Thorson	204
0200	U.S. Department of the Interior, Office of Environmental Policy and Compliance	Pamela Bergmann, Regional Environmental Officer, Alaska	205
0201	-	Cynthia Allen	206
0202	United Association of Plumbers and Pipefitters Local 375	Bret Helms, Training Director	207
0203	-	Judy Patrick	208
0204	North Star Terminal and Stevedore Co. LLC and North Star Equipment Services	Steve Post, Vice President	607

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Comment Document Number	Agency, Organization, or Business Name (if applicable)	Commenter Name	Comment Numbers
0205	-	Jeremy Bryant	608
0206	SteelFab	Richard Faulkner. President	454
0207	-	Seth Soto	455
0208	-	Malcom Markwell	456
0209	-	Brandond Spaulding	457
0210	-	Nick Faughnan	458
0211	-	Steven Riley	459
0212	-	Joe Khotesouvan	460
0213	-	David Miller	461
0214	-	Robert Johnson	462
0215	-	Rick Euscher	463
0216	-	Tou Thampithak	464
0217	-	Thomas Olemaun	465
0218	-	Larry Larson	466
0219	-	Kevin Mesceda	467
0220	Alaska Miners Association, Inc	Fred Parady, Executive Director	468-469
0221	EPA, Region 10	Christine Reichgott, Manager, Environmental Review and Sediments Management Group	470-486, 744-746
0222	Kuukpik Corporation	Isaac Nukapigak, President	487-492
0223	Fairbanks Pipeline Training Center	Jim Sampson, Director	493
0224	Alaska State Legislature	Mike Hawker, Representative, House District 32	494
0225	USFWS, Fairbanks Field Office	Sarah Conn, Field Supervisor	495-502, 731-735
0226	Alaska Oil and Gas Association	Kate Williams, Regulatory Affairs Representative	503-505
0227	Plumbers and Pipefitters Local 375	James Laiti, Business Manager	506
0228	Iñupiat Community of the Arctic Slope	George Edwardson, President	526-546, 729, 730, 747-749, 751-754
0229	BP Exploration (Alaska) Inc	Clair Fitzpatrick, CFO	507
0230	Exxon Mobil Corporation	R. Lee Bruce, Agent and Attorney-in-Fact	609-726, 741, 742, 3444-3446

Table 8: Comments Received by Document Number			
Comment Document Number	Agency, Organization, or Business Name (if applicable)	Commenter Name	Comment Numbers
0231	Northern Alaska Environmental Center et al.	Pamela Miller, Arctic Program Director	547-591, 743
0232	-	Bob Barndt	508
0233	-	Matthew Cronin	509
0234	-	Ron Kahlenbeck	510
0235	NSB	Charlotte Brower, Mayor	511-515, 736, 737
0236	-	Ray Smith	592
0237	-	Steve Percy	593
0238	NOAA, National Marine Fisheries Service (NMFS)	Robert Mecum (for) James W. Balsiger, Ph.D., Administrator, Alaska Region	516-521, 750
0239	Fairbanks North Star Borough	Chris Storhok, Economic Development Specialist	522
0240	Fairbanks North Star Borough	Luke Hopkins, Mayor	523
0246	Shell Exploration & Production	Susan Childs	738-740
0247	-	Jimmy Parrish	755

Attachments

Attachment 1 – Comment Form

Attachment 2 – Fact Sheet

Attachment 3 – Public Notice of Application for Permit

Attachment 4 – ExxonMobil Handout

Attachment 5 –Comment Documents/Responses

Attachment 1 – Comment Form

POINT THOMSON PROJECT EIS

Comment Form

Your input is important to this project. Please provide your comments below and mail to the address preprinted on the back of this page. You may attach additional sheets. Comments can also be dropped in the box at the public meetings, submitted on the Web site at http://www.pointthomsonprojecteis.com, emailed to Comments@PointThomsonProjectEIS.com, or faxed to (907) 644-2022. To be considered in the Draft EIS, comments are due by January 18, 2012, by 5 PM Alaska Standard Time.

Name:	
Email:	
Address:	
City:	State: Zip:

Comments (Please Print):

Thank you for your participation!

POINT THOMSON PROJECT EIS

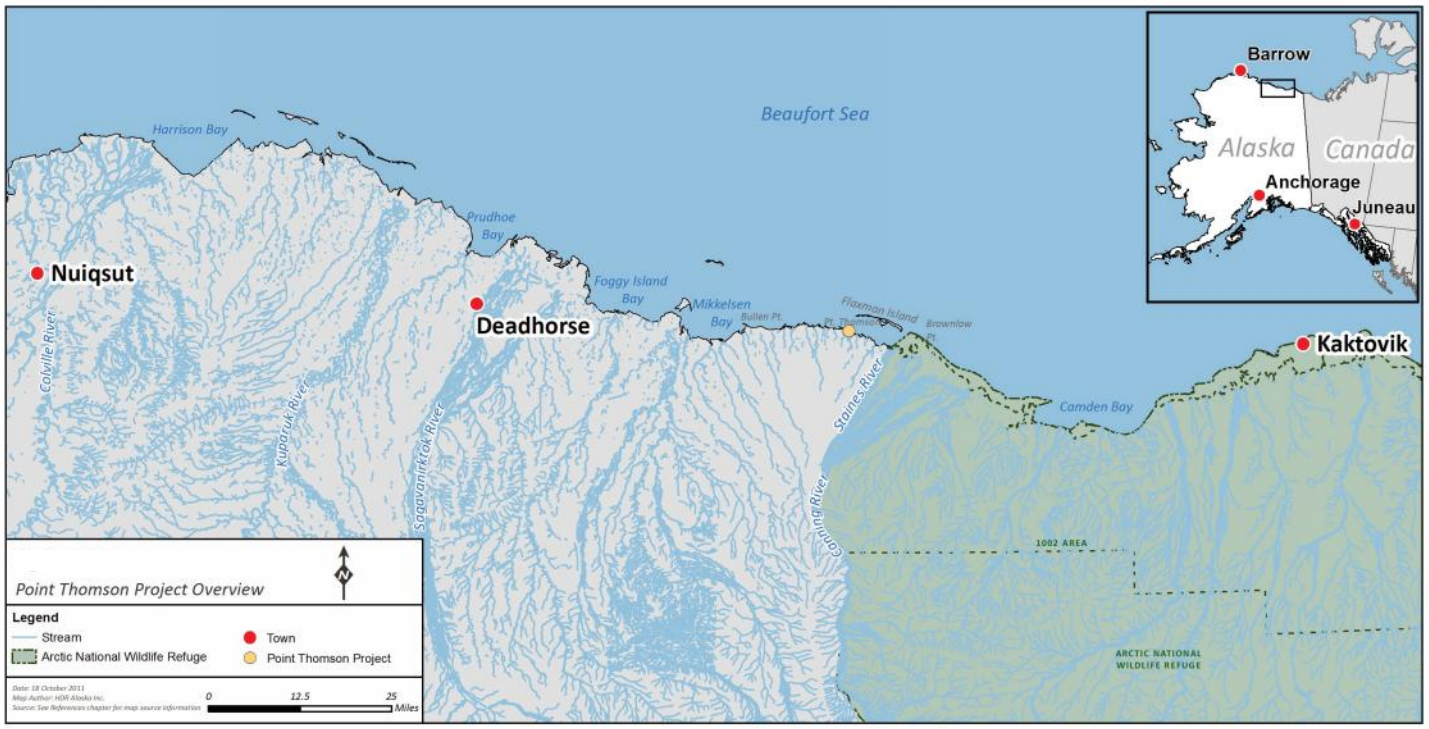
www.pointthomsonprojecteis.com

----------FOLD HERE AND TAPE AT BOTTOM IF MAILING----------

Place postage here

Rosetta Alcantra, Public Involvement Lead
HDR Alaska, Inc.
Attn: Point Thomson Project EIS
2525 C Street, Suite 305
Anchorage, AK 99503-2632

Attachment 2 – Fact Sheet



Project Scope and Purpose

ExxonMobil is applying for approval to construct and operate a gas cycling facility to produce liquid hydrocarbons that would be located on the Beaufort Sea coast between Deadhorse and Kaktovik, Alaska (see map above). Before construction may begin, the applicant must obtain all needed permits and approvals, including a permit from the U.S. Army Corps of Engineers (Corps) that would allow the applicant to place fill material in waters of the United States. As a result of this permit application, the Corps has developed an Environmental Impact Statement (EIS) to analyze potential impacts associated with the proposed project.

The primary hydrocarbon resource at Point Thomson is natural gas and gas condensate from the Thomson Sand Reservoir; a thin oil rim is also present. Evaluating these hydrocarbon resources is part of the proposed action and would include identifying and assessing the location, size, and characteristics of the reservoir and the resources contained therein, as well as determining the commercial viability of producing those resources.

Common components to the action alternatives include:

- Construction and operation of at least five wells drilled from three onshore pads;
- Long reach drilling from onshore pads to the offshore portions of the reservoir;
- Processing and support facilities;
- An airstrip and in-field gravel roads;
- A gravel mine;
- Ice roads;
- In-field gathering pipelines; and
- A new export pipeline west to connect with the Trans Alaska Pipeline System.

Project Purpose and Need

The overall purpose of the project is to produce liquid hydrocarbons from the Thomson Sand Reservoir and further evaluate and delineate the reservoir and evaluate the Brookian Group sandstones.

Project Participants

Lead Federal Agency—*U.S. Army Corps of Engineers (Corps)*

The Corps has responsibility to approve or deny authorization for the placement of fill material in waters of the United States. As part of this permit review process, the Corps is the lead federal agency for the development of this Draft Environmental Impact Statement (EIS) and consulting with other agencies and Tribal governments.

Applicant—*ExxonMobil*

ExxonMobil has prepared a permit application to the Corps for authorization of development in the Point Thomson area.

Cooperating Agencies—

- *U.S. Environmental Protection Agency*
- *U.S. Fish and Wildlife Service*
- *State of Alaska Department of Natural Resources*

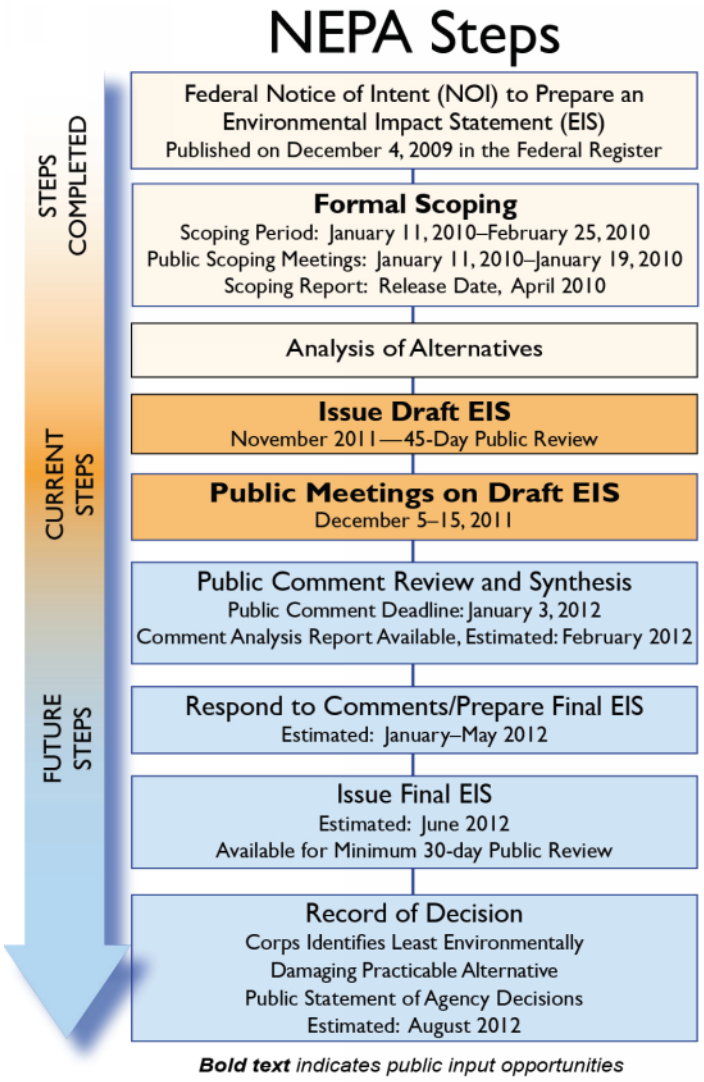
Cooperating agencies have jurisdiction by law (such as enforcing the Endangered Species Act, Clean Air Act, or Clean Water Act) or special expertise in regard to any potential environmental impact to be addressed in the EIS. Cooperating agency responsibilities include assisting the Corps in identifying issues of concern and providing meaningful and timely comment and input throughout the NEPA process.

Consulting Team—*HDR Alaska, Inc.*

HDR Alaska, Inc. is the environmental team hired to assist the Corps in developing the EIS. The consulting team operates under the direction of the Corps.

Comment Period

From now until January 3, 2012, the Corps is accepting comments on the Draft EIS. Agencies, Tribal governments, and the public are encouraged to comment in writing, by email, or through the project Web site during the review period. Substantive comments will be responded to in the Final EIS, which is scheduled for publication in mid-2012.



For More Information, Contact:

Hank Baij, Project Manager
U.S. Army Corps of Engineers
P.O. Box 6898 CEPOA-RD-N
JBER, Alaska 99506-0898
Phone: (907) 753-2784
Toll-free in Alaska: (800) 478-2712
Email: comments@pointthomsonprojecteis.com

Visit the project Web site at:

www.pointthomsonprojecteis.com

Attachment 3 – Public Notice of Application for Permit

US Army Corps
of Engineers
Alaska District

Public Notice of Application for Permit

ANCHORAGE
Regulatory Division (1145)
CEPOA-RD
Post Office Box 6898
JBER, Alaska 99506-0898

PUBLIC NOTICE DATE: November 18, 2011

EXPIRATION DATE: January 3, 2012

REFERENCE NUMBER: POA-2001-1082-M1

WATERWAY: Beaufort Sea

The public in hereby notified a Department of the Army (DA) permit application has been received for proposed work in waters and navigable waters of the United States (US), including streams, wetlands, and marine waters, as described below and shown on the enclosed project drawings.

Comments on the described work noting US Army Corps of Engineers (USACE) file number POA-2001-1082-M1, Beaufort Sea, need to be submitted no later than the expiration date of this Public Notice (shown above) to become part of the administrative record and be considered in our permit decision. Please submit comments to the USACE Project Manager listed immediately below by the communication method of your choice.

USACE PROJECT MANAGER: **Harry A. Baij Jr.** Submit comments to the US Mail address above, by calling 907-753-2784 (office), 907-350-5097 (cell), toll free in Alaska at 800-478-2712, by fax at 907-753-5567, or by e-mail address at **harry.a.baij@usace.army.mil.** Comments and requests for information can be sent directly to Mr. Baij at the above e-mail address.

APPLICANT: Exxon Mobil Corporation and PTE Pipeline LLC.

APPLICANT'S AGENT: Mr. Lee Bruce, Senior Project Manager, Point Thomson Project, ExxonMobil Development Company (EMDC), a wholly-owned subsidiary of ExxonMobil Pipeline Company; 3301 C Street, Suite 400, Anchorage, AK 99503; telephone 832-868-2270.

APPLICANT'S POINT OF CONTACT: Mr. Brien Reep, Environmental and Regulatory Manager, ExxonMobil Development Company, Point Thomson Project, Post Office Box 190267, Anchorage, AK 99519-0267, telephone 907-564-3617.

LOCATION: Alaska's Beaufort Sea coastline, North Slope Borough, approximately 60 miles east of Prudhoe Bay and 60 miles west of Kaktovik, Alaska. The development would consist of 3 coastal gravel pads:

1. The Central Pad would be located at approximate Latitude 70.1713° N., Longitude 146.2568° W. in Sec. 34, T. 10 N., R. 23 E. and Sec.03, T. 09 N., R. 23 E., Umiat Meridian.

2. The East Pad would be located at approximate Latitude 70.1467° N., Longitude 146.1084° W., in Sec. 8, T. 09 N., R. 24 E., Umiat Meridian.

3. The West Pad would be located at approximate Latitude 70.1806° N., Longitude 146.4394° W., in Sec. 36, T. 10 N., R. 22 E., Umiat Meridian.

4. A proposed export pipeline would extend west 22 miles from the Central Pad to connect with an existing common carrier pipeline to the Trans Alaska Pipeline System.

5. The airstrip, mine site, and support pad would be located approximately 2.5 miles south of the Central Pad.

Vicinity and smaller scale maps are attached. Tabs 15, 16, and 17 of the permit application provide additional information on the geographic coordinates and legal description of the other proposed facilities. These include gravel fill roads, gravel pads, airstrip, mine site, elevated pipelines, processing facilities, and supporting infrastructure.

APPLICANT'S PURPOSE: Initiate commercial hydrocarbon production (natural gas condensate) and delineate and evaluate hydrocarbon resources in the Point Thomson area.

PROPOSED WORK: Total acreage of wetland fill would be approximately 267.5 acres. Fill would include gravel for drilling/production pads and connecting roads, airstrip, gravel mine and overburden replacement, vertical support members (VSM's) for in-field pipelines and an export pipeline, and pilings for a proposed barge offloading facility and service pier. Fill material would come from a new mine site located at approximately 2.5 miles inland at approximate Latitude 70.146.65° N. and Longitude 146.2528° W. Minor dredging and screeding in marine waters will be required in the barge docking area offshore of the Sealift Bulkhead and Service Pier with a small amount of fill placed onshore.

The project comprises the two major components of production facilities and an export pipeline. These include three gravel pads, 5 development wells, infield gathering lines, 12 miles of infield gravel roads, a 5,600 foot airstrip, a gravel mine, and processing facilities and support infrastructure. Two of the wells were drilled from the existing Central Pad in 2009-2010 under State and local approval and did not require new fill or additional DA authorization.

The use of Long Reach Direction Drilling (LRDD) allows development of the primarily offshore Thomson Sand Reservoir from three onshore pads located near the coast. The Central Pad (total 56 acres including 13.2 acres of existing fill) involves the expansion of an existing pad (Point Thomson Unit No. 3) to accommodate additional drilling, processing facilities, and support infrastructure (e.g. camps, utilities, warehouses, storage, and waste management facilities). At the Central Pad, processing facilities will separate hydrocarbon liquids from the natural gas, re-inject residual gas, and stabilize the liquid hydrocarbons for transport in the Point Thomson Export Pipeline.

The West and East Pads are strategically located to access the western and eastern extents of the Thomson Sand Reservoir. The West Pad (approximately 19 acres) would be a new pad to support drilling and production. It would be located 4 miles west of the Central Pad at 20+ feet elevation. The East Pad would include a new 11-acre pad on the sea coast at 17+ feet elevation connected to the existing 4.6 acre North Staines River No. 1 exploration pad, which will be utilized for temporarily staging equipment and camps during drilling. Gathering pipelines would be elevated a minimum of 7 feet above the wetland tundra surface on VSMs to transport hydrocarbons produced from the West and East Pads to the Central Processing Facility at the Central Pad.

Other proposed production infrastructure includes:

- A 5,600-foot gravel airstrip for all-season transportation;

- An onshore bulkhead and offshore mooring dolphins for offloading facility modules from sealift barges;

- A service pier and mooring dolphins for offloading smaller coastal re-supply barges;

- A boat launch to support access by emergency response vessels;

- An infield gravel road network (approximately 12 miles) for transport of personnel, equipment (including drilling rigs), materials and supplies between the three Pads and other field locations in support of drilling, operations and emergency response;

- A gravel mine site; and

- A Class I injection well (already permitted) for disposal of produced water, domestic wastewater and other authorized waste streams.

Construction activities are proposed to commence in the winter of 2012/13 and be completed by the winter of 2015/2016. Civil construction, including gravel placement and gravel mining, would be mainly conducted during the winters of 2012/13 and 2013/14. Production infrastructure construction would commence in early 2013 and be completed in winter 2015/2016. Sealift of large processing facility modules would take place in the summer of 2015. Drilling operations are planned to commence in early 2015 and be completed in early 2017. Facility module installation, commissioning, and startup are planned in 2015 to early 2016 followed by production and construction demobilization in 2016.

The export pipeline would be a common carrier pipeline and therefore subject to additional regulation (Federal Energy Regulatory Commission) from the infield gathering pipelines. The 22-mile long, 12-inch nominal diameter export pipeline would receive processed liquid hydrocarbons from the Central Processing Facility to a connection with the British Petroleum's Badami Facility, Sales Oil Pipeline. The export pipeline would also be elevated a minimum of 7 feet above the wetland tundra surface on VSMs. Other export pipeline facilities would include a small dill pad at Badami for a leak detection and metering skid and a small pipeline crossing pad to allow ice road crossings. The export pipeline construction would be conducted from ice roads over two winter seasons in 2012/13 and 2013/14.

ADDITIONAL INFORMATION: Additional information is available from the Environmental Impact Statement (EIS) website established by the USACE for this proposal at www.pointthomsonprojecteis.com, or by contacting the USACE Project Manager above.

More information is also contained in the complete DA permit application, including a more detailed description of proposed facilities, additional technical plans and figures, and proposed mitigation. The complete application is available at the above cited website and published in the Draft EIS under the file number POA-2001-1082-M1, Beaufort Sea.

In addition, the Applicant has provided the USACE with supporting documentation to supplement its permit application. This documentation includes:

1. Point Thomson Project, Project Description (October 2009), as updated by the Point Thomson Project Addendum (September 13, 2010) and Point Thomson Project Update (February 11, 2011).

2. Point Thomson Project Environmental Report (November 2009) provides Applicant's analysis of relevant environmental impacts of the Project.

3. Point Thomson Project Export Pipeline Right-of-Way Lease Application (August 4, 2010).

4. Point Thomson Project Environmental Mitigation Report (June 17, 2011).

5. Point Thomson Project Section 404(b) (1) Practicability Analysis of Point Thomson Project Preliminary Draft Environmental Impact Statement Alternatives (May 13, 2011).

6. The Point Thomson Oil Spill Preparedness Report (June 17, 2011).

7. Applicant has also supported the National Environmental Policy Act and USACE Regulatory Program processes with submissions of technical information, responses to requests for information, and workshops, including a Hydrology Workshop (March 8, 2011), and a Gravel Mining and Rehabilitation Plan Workshop (March 15, 2011).

APPLICANT PROPOSED MITIGATION: The Applicant has proposed mitigation measures to avoid and minimize impacts to waters of the US from activities involving discharge of dredged or fill material in the Point Thomson Environmental Mitigation Report (June 17, 2011). The major avoidance, minimization, and compensatory mitigation measures are outlined below.

a. Avoidance: Avoid the use of significant offshore development structures and facilities to minimize impacts in the Beaufort Sea. The three pad configuration on the coast provides the optimal location for development of the predominantly offshore reservoir using LRDD and is intended to avoid the need for additional drilling pads to accommodate any potential future full field development.

b. Minimization: Project design, supported by wetlands, hydrology, and other studies, has been focused on minimizing environmental impacts. This includes minimizing the total area of wetlands fill and construction in marine/navigable waters. Examples include:

1 Remote project development without proposed permanent gravel road construction to the Prudhoe Bay infrastructure by reliance on seasonal ice roads, a gravel airstrip, and barging with minimal offloading facilities.

2 Use of three existing gravel pads, minimizing the need for new overall tundra wetland fill footprint by more than 20 acres.

3 Minimizing gravel pad size through optimization of facility and equipment layout.

4 Designing and locating pads, roads, bridges, and culverts to maintain natural drainage patterns and stream flows to the extent practicable.

5 Routing the infield gravel roads to minimize overall length and fill footprint, with consideration for hydrology impacts and wetlands values.

6 Limiting permanent structures in marine waters to vertical piles for the service pier, mooring dolphins, sealift barge ramp, and small boat launching ramp.

c. Compensatory Mitigation: Payment of an in-lieu fee to The Conservation Fund (TCF). TCF is the only in-lieu fee sponsor currently authorized to provide compensatory mitigation for impacts to waters of the US on Alaska's North Slope. The Applicant would work with TCF and the USACE to develop an appropriate Mitigation Plan to satisfy compensatory mitigation requirements. This would include opportunities which may be available on the North Slope.

WATER QUALITY CERTIFICATION: A permit for the described work will not be issued until a certification or waiver of certification, as required under Section 401 of the Clean Water Act (Public Law 95-217), has been received from the Alaska Department of Environmental Conservation.

CULTURAL RESOURCES: Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR 800) require Federal agencies to consider the effects of their undertakings on cultural resources that are eligible for the National Register of Historic Places. Consultation with the State Historic Preservation Officer (SHPO), tribes and other parties regarding plans to avoid, minimize, or mitigate any impacts to eligible cultural resources occurs throughout the Section 106 process. Issuance of a Federal permit qualifies as an "undertaking" under Section 106; therefore the impacts of the proposal on historical, cultural, and archaeological resources are being addressed in the EIS and will be considered in the decision whether to issue a permit. The USACE, as Lead Federal Agency for the Point Thomson Project EIS, has initiated consultation with the SHPO.

The Applicant has prepared and submitted a Cultural Resource Management Plan (CRMP), including a data gap analysis and fieldwork, to identify cultural resources in the project area. The CRMP was reviewed by North Slope Borough (NSB), Inupiat History, Language, and Culture (IHLC) Division and the Alaska Office of History and Archaeology (OHA) during its preparation. There are potentially eligible properties in the project area and a determination of effect will be made in consultation with the SHPO. Review of the applicant's CRMP and review of the Alaska Heritage Resources Survey (AHRS) constitutes the extent of cultural resource investigations by the USACE at this time. Any comments the SHPO or other

consulting parties may have concerning presently unknown archeological or historic data that may be lost or destroyed by work under the requested permit will be considered in our final assessment of the described work.

ENDANGERED SPECIES: The project area is within the known range of the Spectacled eider (Somateria fischeri) and Polar bear (Ursus maritimus). The project area is also within the historical range of Steller's eider (Polystic stelleri). All three species are listed as threatened under the Endangered Species Act (ESA) of 1973. One other species that may occur near the Project, the Yellow-billed Loon (Gavia adamsii), is a candidate for listing under the ESA.

The project area is also within the range of the Bowhead whale (Balaena mysticetus), Ringed seal (Phoca hisipida), and Bearded seal (Erignathus barbatus). Bowhead whales are listed as endangered, while Ringed and Bearded seals have been proposed for listing by NMFS as threatened under the ESA.

The Applicant has been designated by the USACE as the non-federal representative to prepare Biological Assessments (BAs) for the listed species, subject to review and approval by the USACE, to support the ESA Section 7 consultation process. Two BAs have been drafted for approval by the USACE for consultation with the USFWS and NMFS respectively:

- Point Thomson Project Biological Assessment of the Polar bear (Ursus maritimus), Spectacled eider (Somateria fischeri), Steller's eider (Polysticta stelleri), and Yellow-Billed loon (Gavia adamsii) - October 2011

- Biological Assessment of the Bowhead whale (Balaena mysticetus), Ringed seal (Phoca hispada), and Bearded seal (Erignathus barbatus) - October 2011

These draft BAs provide data on the distribution, abundance and habitat use of the listed and candidate species, and describe the effects of the project and proposed mitigation to minimize impacts on those species.

For species under the jurisdiction of US Fish and Wildlife Service, it has been preliminarily determined the proposal is "not likely to adversely affect" the Polar bear, Spectacled eider, and the Yellow-billed loon. The preliminary determination for the Steller's eider is "not likely to affect". It has also been preliminarily determined the activity "may affect, but is not likely to cause destruction or adverse modification" of designated Polar bear critical habitat.

Preliminarily, a determination of "not likely to adversely affect" the Bowhead whale, Ringed seal, and Bearded seal has been made in the draft BA for the National Marine Fisheries Service.

This application is being coordinated with the USFWS and the NMFS. Any comments they may have concerning endangered or threatened wildlife or plants or their critical habitat will be considered in our final assessment of the described work.

ESSENTIAL FISH HABITAT: The Magnuson-Stevens Fishery Conservation and Management Act, as amended by the Sustainable Fisheries Act of 1996, requires all Federal agencies to consult with the NMFS on all actions, or proposed actions, permitted, funded, or undertaken by the agency, that may adversely affect Essential Fish Habitat (EFH).

A review of fish species and studies in the Point Thomson Project area and a preliminary determination with respect to potential Project impacts on fish and EFH is included in the Point Thomson Project Draft EIS (DEIS).

TRIBAL CONSULTATION: The Alaska District fully supports tribal self-governance and government-to-government relations between federally recognized Tribes and the Federal government. Tribes with protected rights or resources that could be significantly affected by the proposed Federal action (e.g., a permit decision) have the right to consult with the Alaska District on a government-to-government basis. Views of each Tribe regarding protected rights and resources will be accorded due consideration in this process. This Public Notice serves as notification to the Tribes within the area potentially affected by the proposed work and invites their participation in the Federal decision-making process regarding the protected Tribal right or resource. Consultation may be initiated by the affected Tribe upon written request to the District Commander during the public comment period.

PUBLIC HEARING: Any person may request, in writing, within the comment period specified in this notice, that a public hearing be held to consider this application. Requests for public hearings shall state, with particularity, reasons for holding a public hearing. The USACE has public meetings to receive comments on the Point Thomson Project Draft EIS Barrow, Nuiqsut, Kaktovik, Fairbanks, and Anchorage, beginning on 05 December in Barrow.

EVALUATION: The decision whether to issue a permit will be based on an evaluation of the probable impacts, including cumulative impacts, of the proposed activity and its intended use on the public interest. Evaluation of the probable impacts, which the proposed activity may have on the public interest, requires a careful weighing of all the factors that become relevant in each particular case. The benefits, which reasonably may be expected to accrue from the proposal, must be balanced against its reasonably foreseeable detriments. The outcome of the general balancing process would determine whether to authorize a proposal, and if so, the conditions under which it will be allowed to occur. The decision should reflect the national concern for both protection and utilization of important resources. All factors, which may be relevant to the proposal, must be considered including the cumulative effects thereof. Among those are conservation, economics, aesthetics, general environmental concerns, wetlands, cultural values, fish and wildlife values, flood hazards, floodplain values, land use, navigation, shore erosion and accretion, recreation, water supply and conservation, water quality, energy needs, safety, food and fiber production, mineral needs, considerations of property ownership, and, in general, the needs and welfare of the people. For activities involving Clean Water Act Section 404 discharges (dredged and fill materials), a permit will be denied if the discharge that would be authorized by such permit would not comply with the Environmental Protection Agency's 404(b) (1) Guidelines. Subject to the preceding sentence and any other applicable guidelines or criteria (see USACE regulations at 33 CFR Parts 320.2 and 320.3), a permit will be granted unless the District Commander determines that it would be contrary to the public interest.

The USACE is soliciting comments from the public; Federal, State, and local agencies and officials; Alaska Native Tribes; and other interested parties in order to consider and evaluate the impacts of this proposed activity. Any comments received will be considered by the USACE to determine whether to issue, modify, condition or deny a permit for this proposal. To make this decision, comments are

used to assess impacts on endangered species, historic properties, water quality, general environmental affects, and other public interest factors listed above. Comments are used in the preparation of the Environmental Impact Statement for the proposal pursuant to the National Environmental Policy Act. Comments will also be used to determine the overall public interest of the proposed activity.

The USACE has determined the proposal may have significant impacts to the quality of the human environment, and required an EIS be prepared. A Notice of Intent to Prepare an EIS was published in the Federal Register on December 4, 2009. The EIS process is ongoing and the public notice for this application is being published concurrently with the Point Thomson Project Draft EIS.

AUTHORITY: This permit will be issued or denied under the following authority:

(X) Perform work in or affecting navigable waters of the United States - Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. 403).

(X) Discharge dredged or fill material into waters of the United States - Section 404 Clean Water Act (33 U.S.C. 1344). Therefore, our public interest review will consider the guidelines set forth under Section 404 (b) of the Clean Water Act (40 CFR 230) and Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. 403).

Project drawings and Notice of Application for State Water Quality Certification are enclosed with this Public Notice.

District Commander
U.S. Army, Corps of Engineers

Enclosures

SEAN PARNELL, GOVERNOR

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION
DIVISION OF WATER
401 Certification Program
Non-Point Source Water Pollution Control Program

ANCHORAGE
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
WQM/401 CERTIFICATION
555 CORDOVA STREET
ANCHORAGE, ALASKA 99501-2617
PHONE: (907) 269-7564/FAX: (907) 334-2415

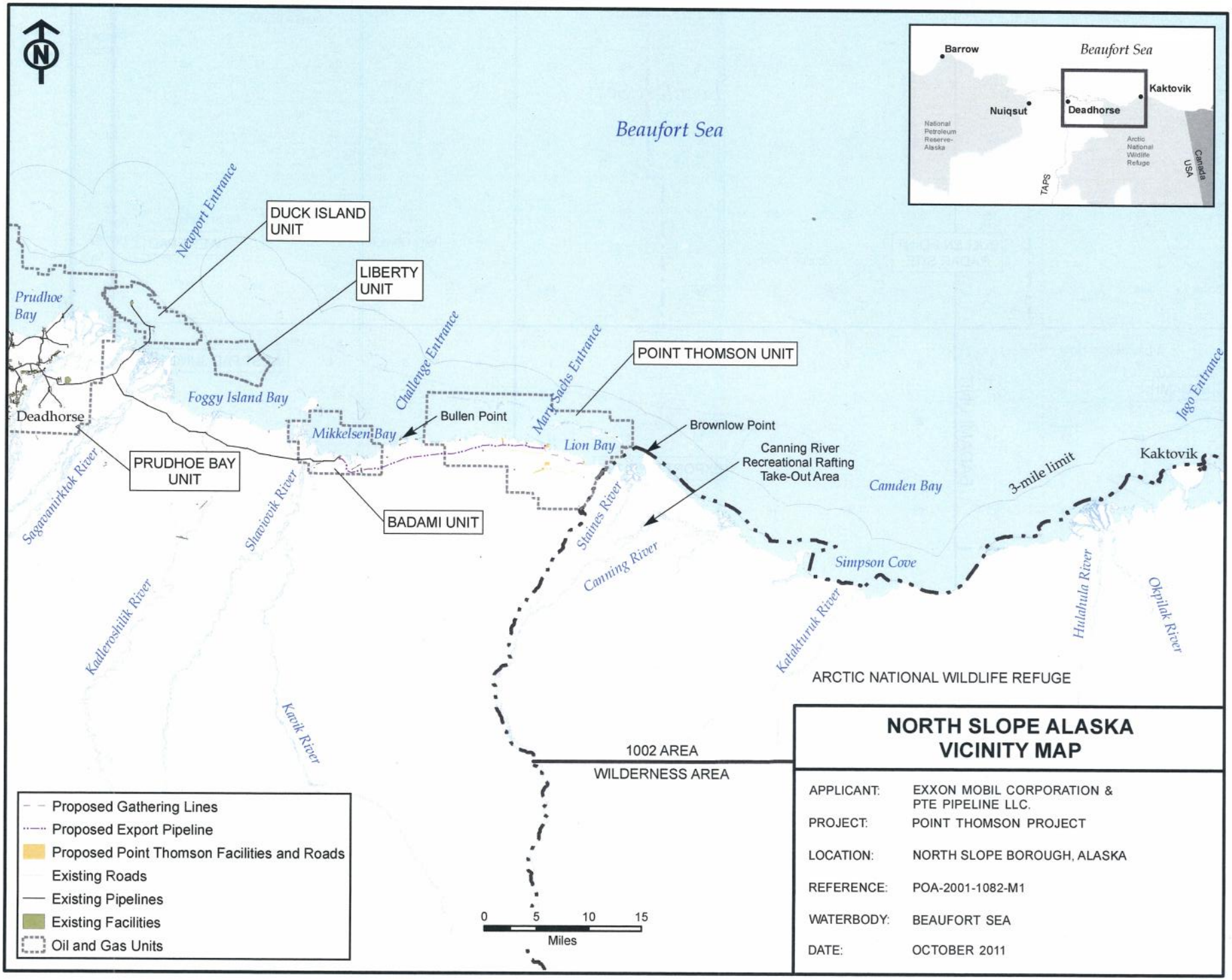
NOTICE OF APPLICATION
FOR
STATE WATER QUALITY CERTIFICATION

Any applicant for a federal license or permit to conduct an activity that might result in a discharge into navigable waters, in accordance with Section 401 of the Clean Water Act of 1977 (PL95-217), also must apply for and obtain certification from the Alaska Department of Environmental Conservation that the discharge will comply with the Clean Water Act, the Alaska Water Quality Standards, and other applicable State laws. By agreement between the U.S. Army Corps of Engineers and the Department of Environmental Conservation, application for a Department of the Army permit to discharge dredged or fill material into navigable waters under Section 404 of the Clean Water Act also may serve as application for State Water Quality Certification.

Notice is hereby given that the application for a Department of the Army Permit described in the Corps of Engineers' Public Notice No. **POA-2001-1082-M1, Beaufort Sea**, serves as application for State Water Quality Certification from the Department of Environmental Conservation.

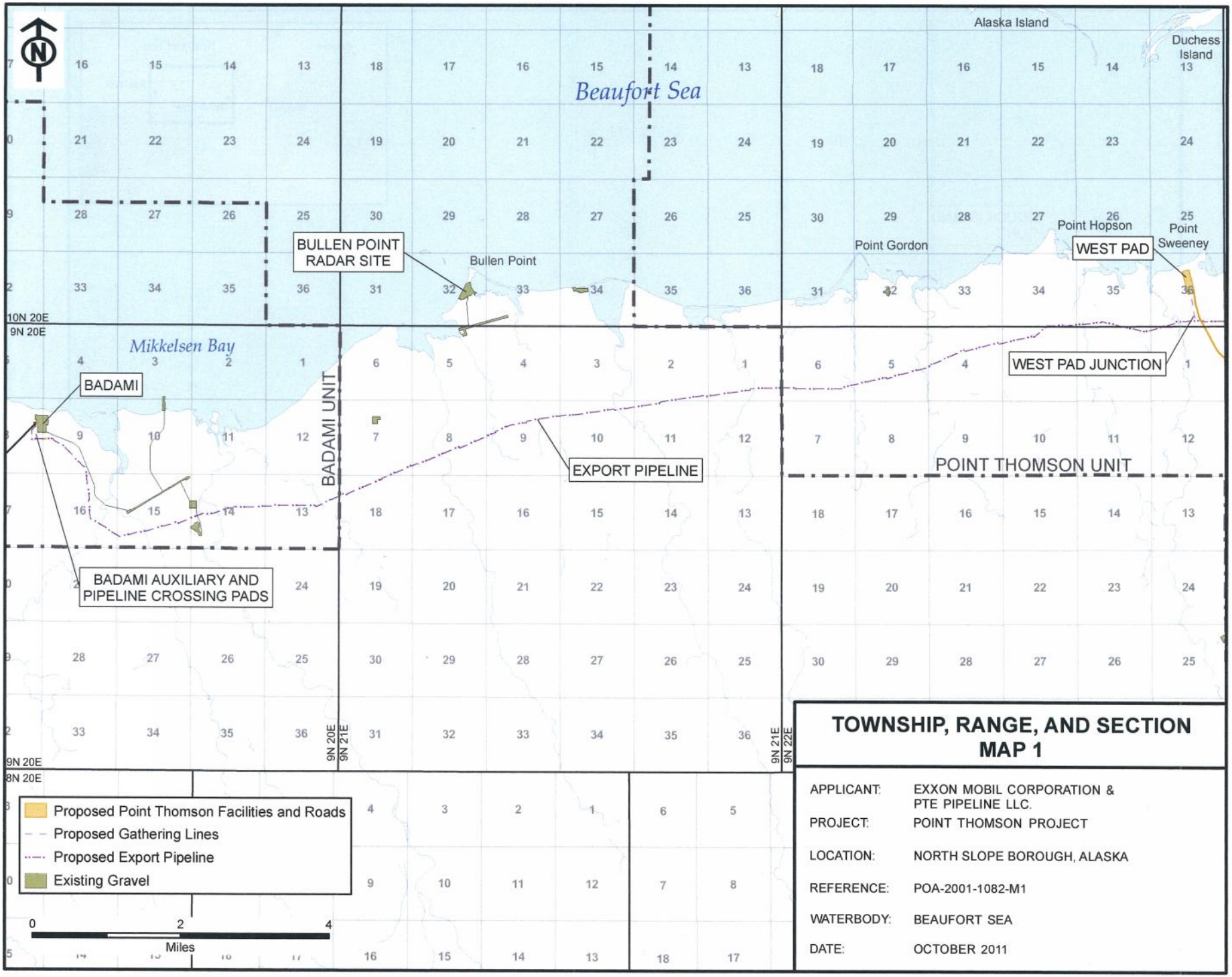
After reviewing the application, the Department may certify there is reasonable assurance the activity, and any discharge that might result, will comply with the Clean Water Act, the Alaska Water Quality Standards, and other applicable State laws. The Department also may deny or waive certification.

Any person desiring to comment on the project, with respect to Water Quality Certification, may submit written comments to the address above by the expiration date of the Corps of Engineer's Public Notice.



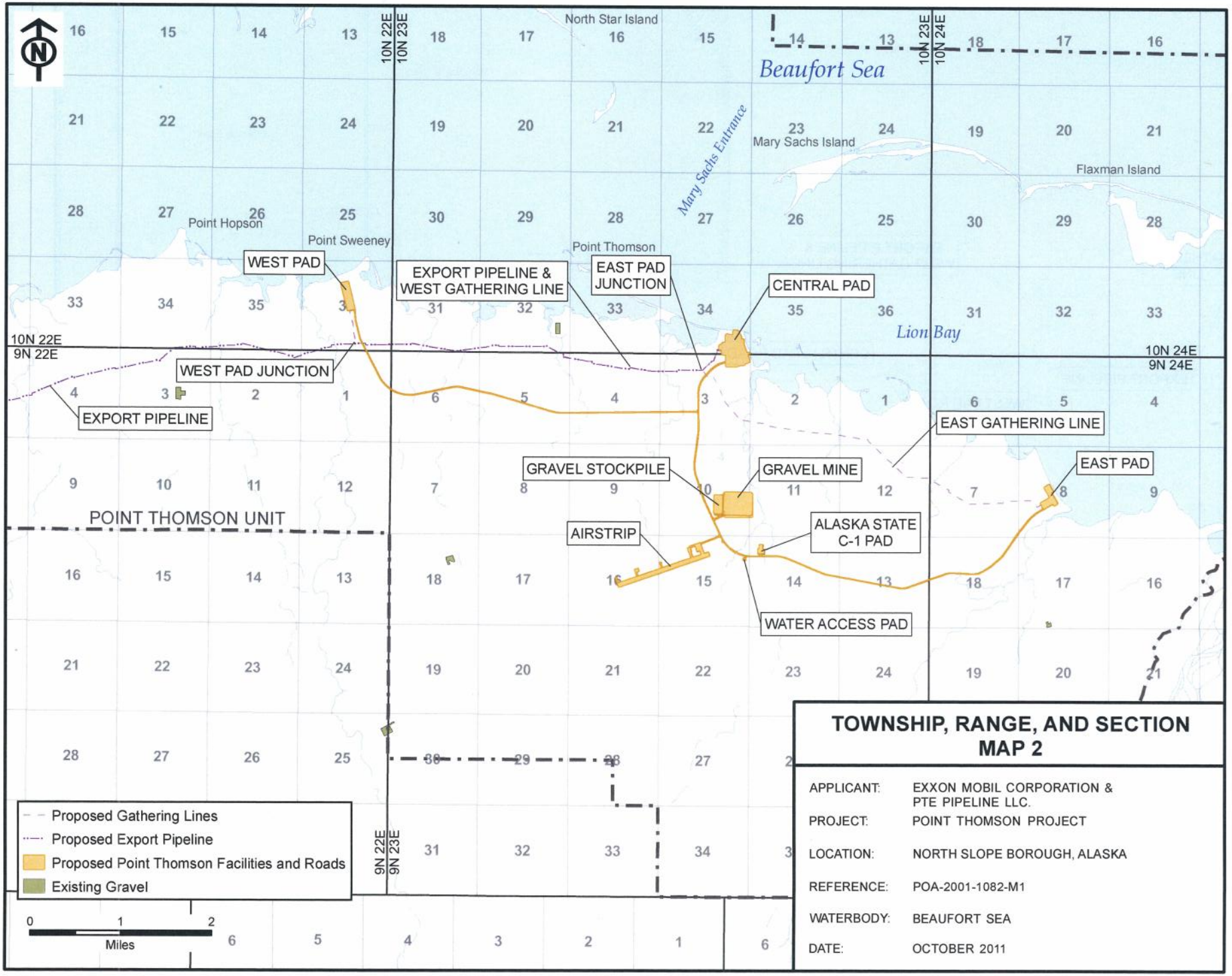
NORTH SLOPE ALASKA VICINITY MAP

APPLICANT:	EXXON MOBIL CORPORATION & PTE PIPELINE LLC.
PROJECT:	POINT THOMSON PROJECT
LOCATION:	NORTH SLOPE BOROUGH, ALASKA
REFERENCE:	POA-2001-1082-M1
WATERBODY:	BEAUFORT SEA
DATE:	OCTOBER 2011



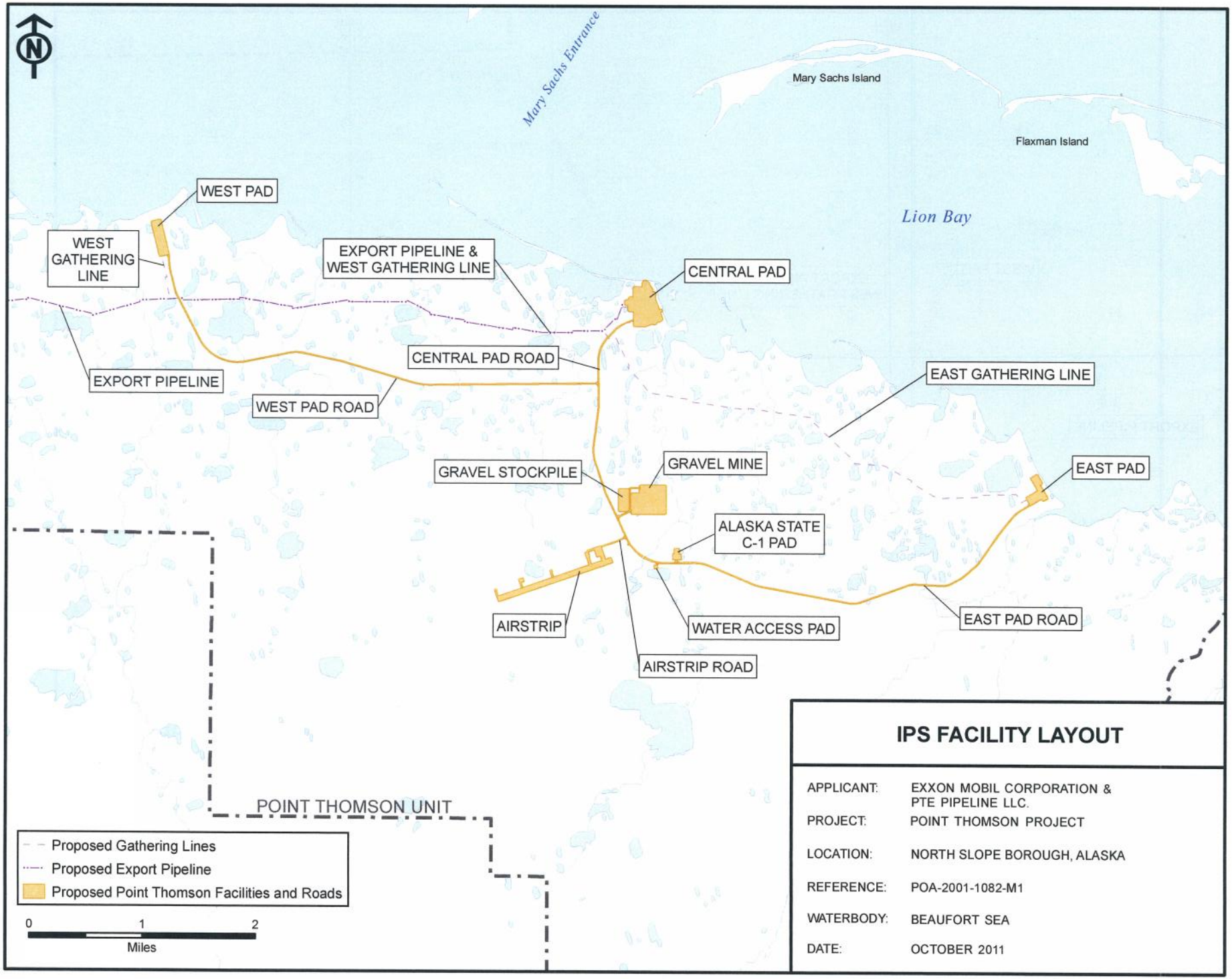
TOWNSHIP, RANGE, AND SECTION MAP 1

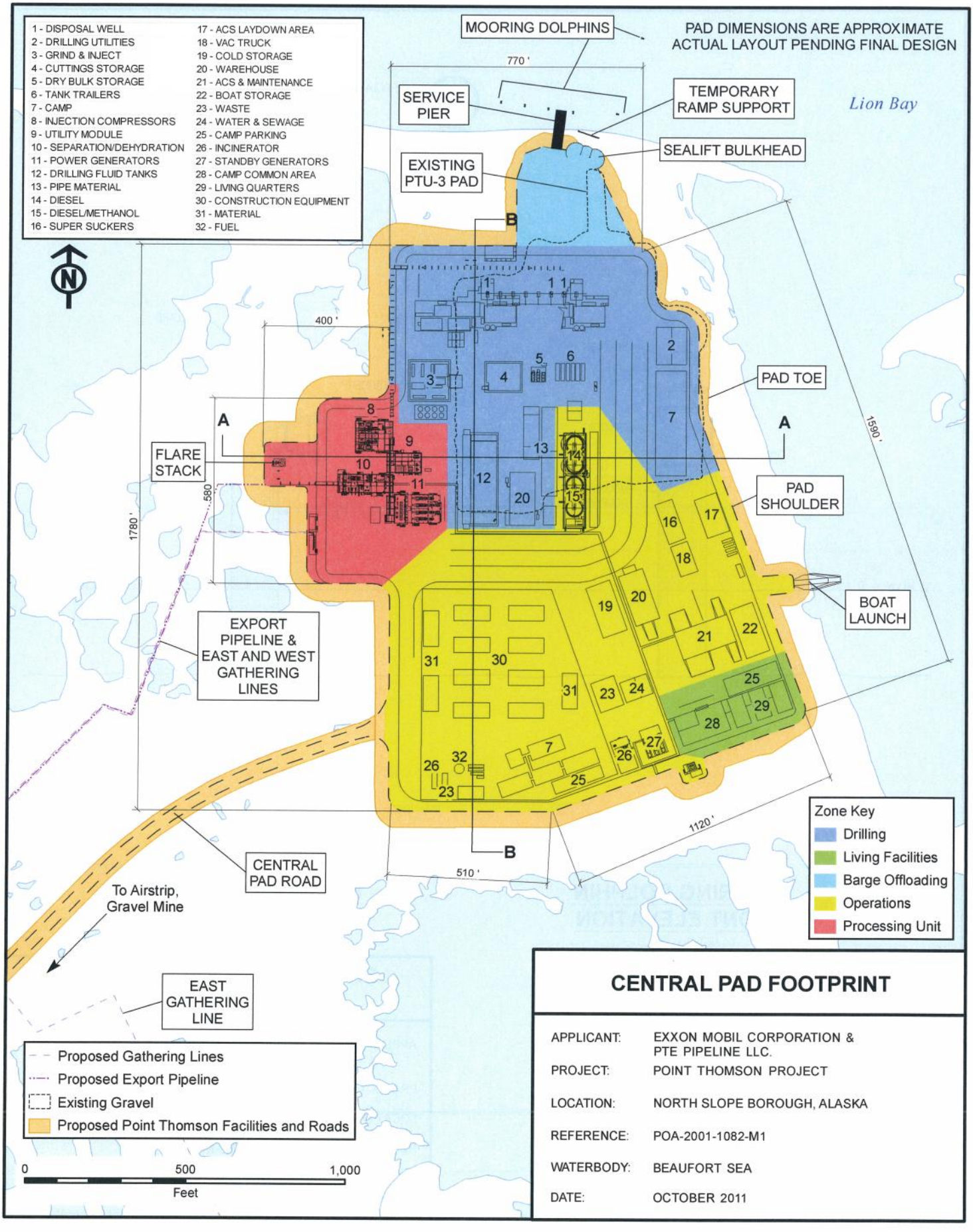
APPLICANT:	EXXON MOBIL CORPORATION & PTE PIPELINE LLC.
PROJECT:	POINT THOMSON PROJECT
LOCATION:	NORTH SLOPE BOROUGH, ALASKA
REFERENCE:	POA-2001-1082-M1
WATERBODY:	BEAUFORT SEA
DATE:	OCTOBER 2011



TOWNSHIP, RANGE, AND SECTION MAP 2

APPLICANT:	EXXON MOBIL CORPORATION & PTE PIPELINE LLC.
PROJECT:	POINT THOMSON PROJECT
LOCATION:	NORTH SLOPE BOROUGH, ALASKA
REFERENCE:	POA-2001-1082-M1
WATERBODY:	BEAUFORT SEA
DATE:	OCTOBER 2011


N
Mary Sachs Entrance
Mary Sachs Island
Flaxman Island
Lion Bay
WEST PAD
WEST GATHERING LINE
EXPORT PIPELINE & WEST GATHERING LINE
CENTRAL PAD
CENTRAL PAD ROAD
EXPORT PIPELINE
WEST PAD ROAD
EAST GATHERING LINE
GRAVEL STOCKPILE
GRAVEL MINE
EAST PAD
ALASKA STATE C-1 PAD
AIRSTRIP
WATER ACCESS PAD
EAST PAD ROAD
AIRSTRIP ROAD
POINT THOMSON UNIT
Proposed Gathering Lines
Proposed Export Pipeline
Proposed Point Thomson Facilities and Roads
0
1
2
Miles
IPS FACILITY LAYOUT
APPLICANT: EXXON MOBIL CORPORATION & PTE PIPELINE LLC.
PROJECT: POINT THOMSON PROJECT
LOCATION: NORTH SLOPE BOROUGH, ALASKA
REFERENCE: POA-2001-1082-M1
WATERBODY: BEAUFORT SEA
DATE: OCTOBER 2011



CENTRAL PAD FOOTPRINT

APPLICANT:	EXXON MOBIL CORPORATION & PTE PIPELINE LLC.
PROJECT:	POINT THOMSON PROJECT
LOCATION:	NORTH SLOPE BOROUGH, ALASKA
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WATERBODY:	BEAUFORT SEA
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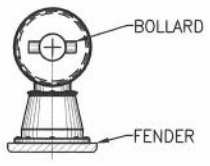
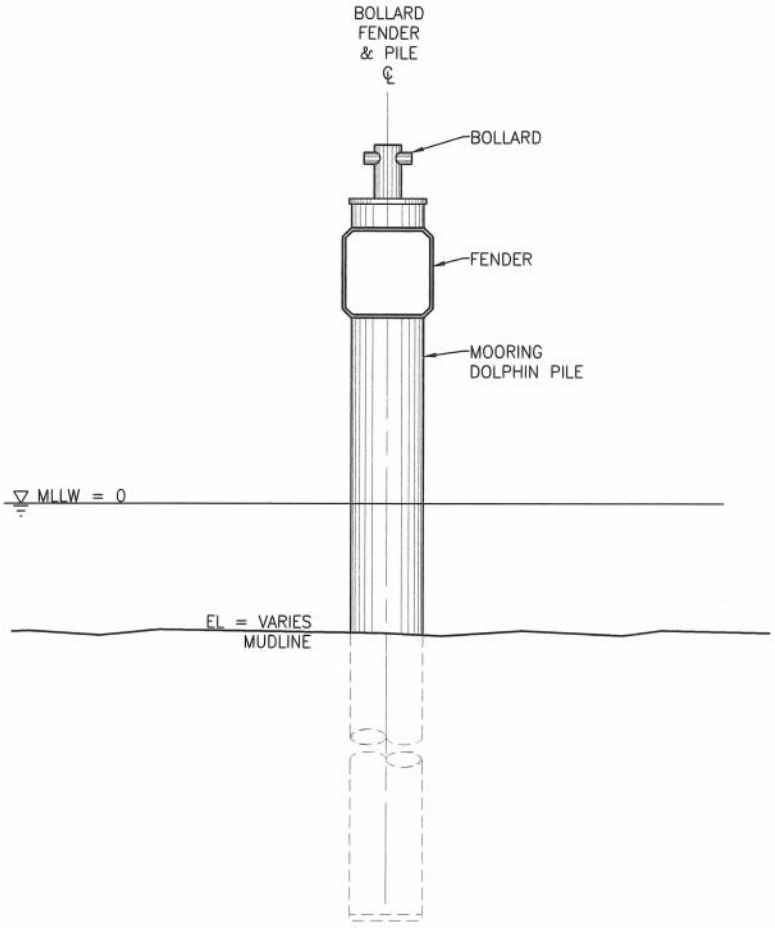
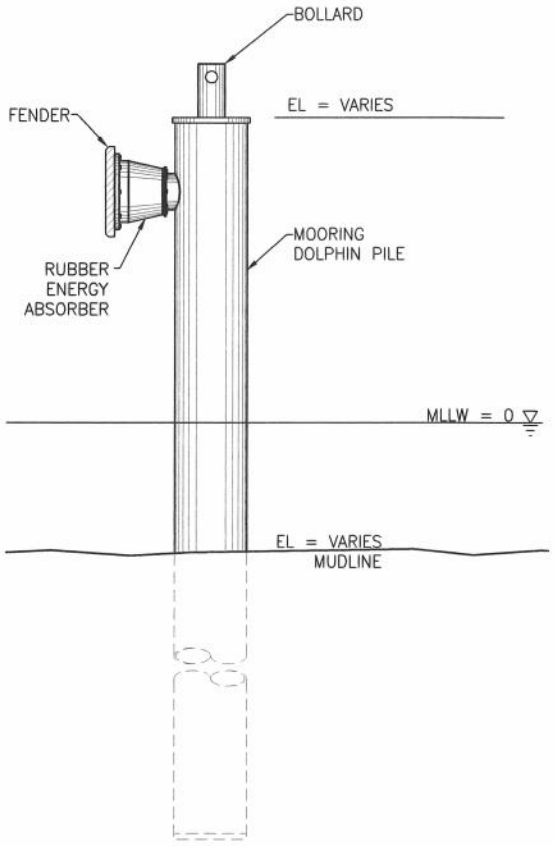


PLAN



MOORING DOLPHIN FRONT ELEVATION

NOT TO SCALE



MOORING DOLPHIN SIDE ELEVATION

NOT TO SCALE

BREASTING/MOORING DOLPHIN PLAN & ELEVATION

APPLICANT:	EXXON MOBIL CORPORATION & PTE PIPELINE LLC.
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LOCATION:	NORTH SLOPE BOROUGH, ALASKA
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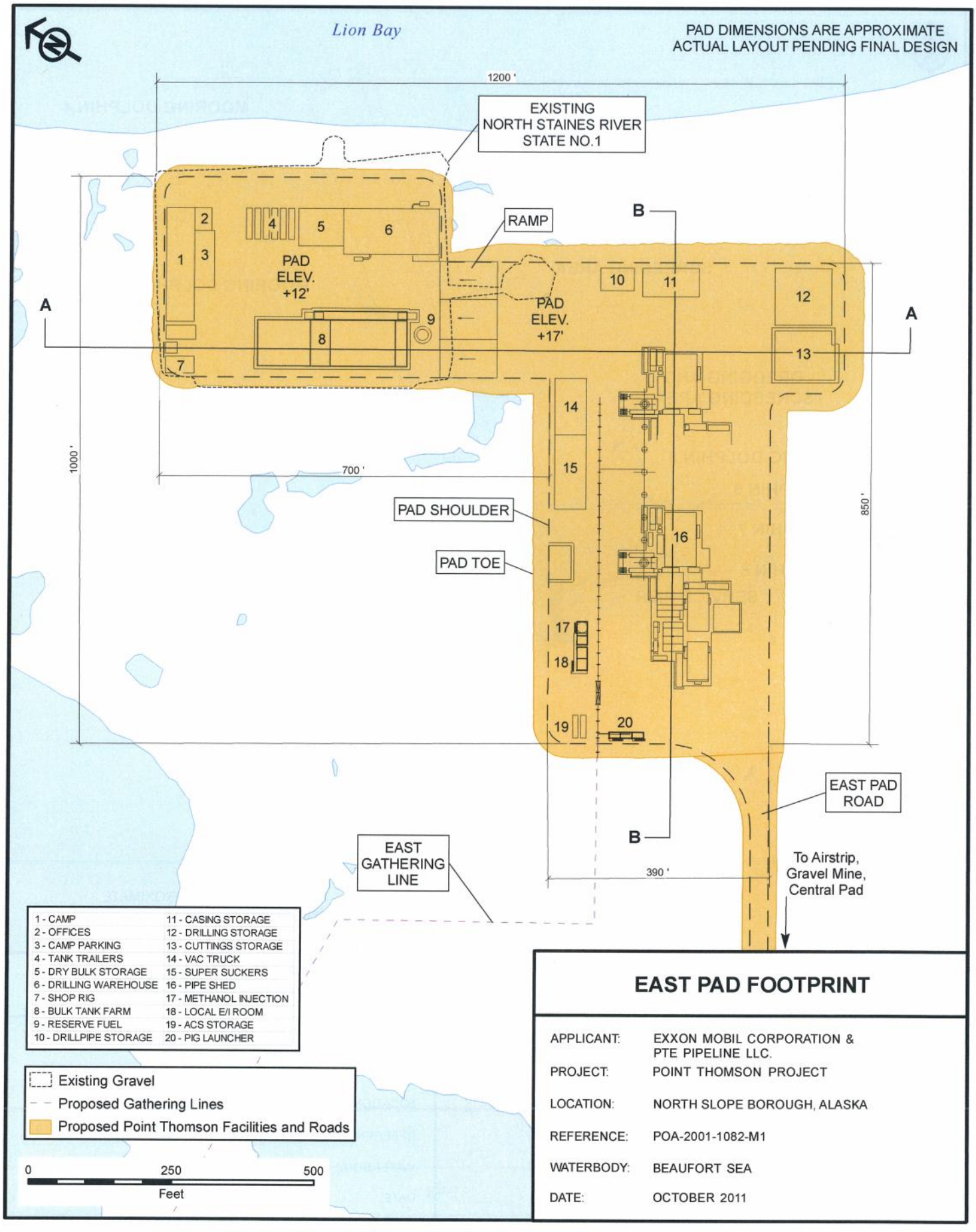

EAST PAD FOOTPRINT

APPLICANT:	EXXON MOBIL CORPORATION & PTE PIPELINE LLC.
PROJECT:	POINT THOMSON PROJECT
LOCATION:	NORTH SLOPE BOROUGH, ALASKA
REFERENCE:	POA-2001-1082-M1
WATERBODY:	BEAUFORT SEA
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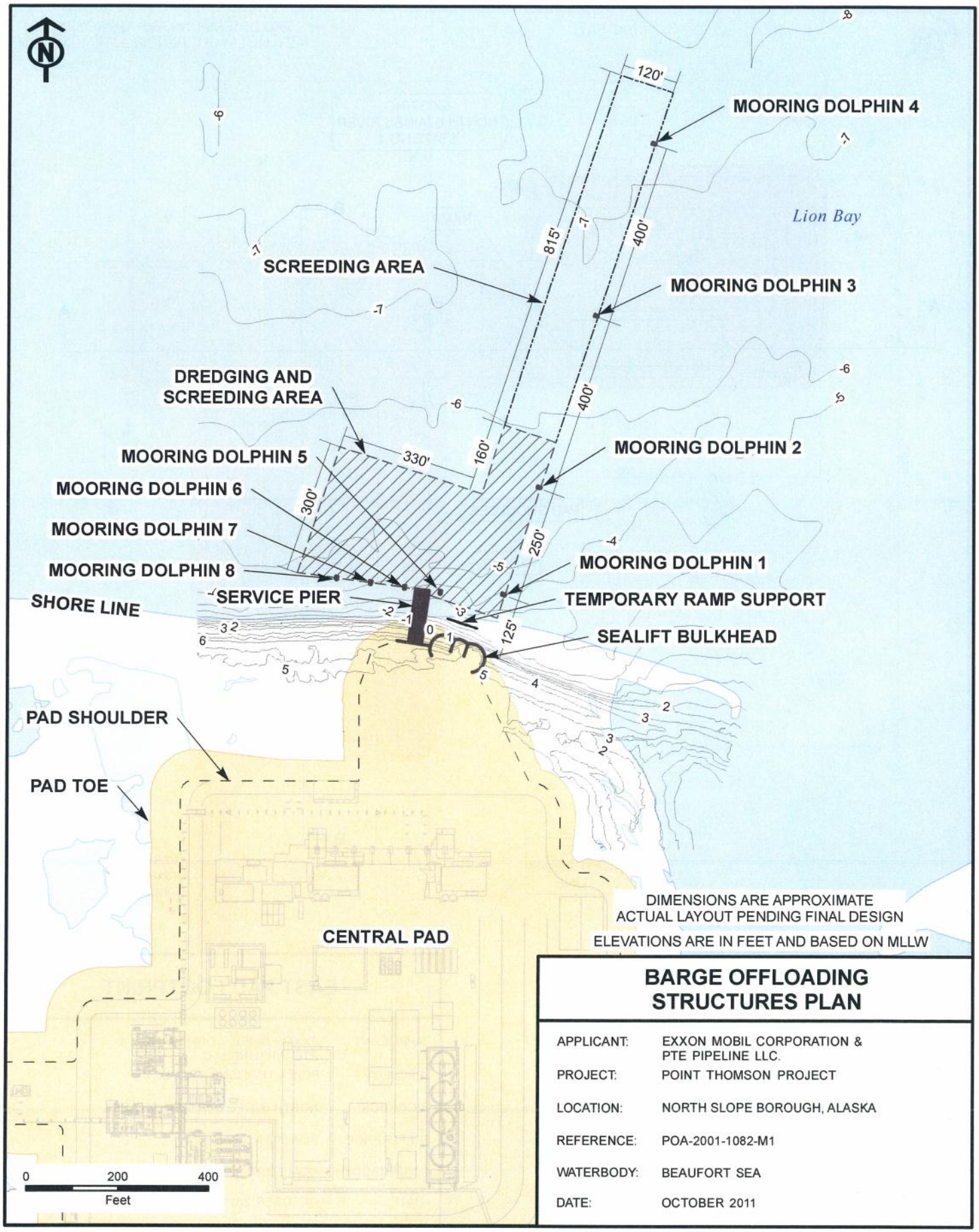

BARGE OFFLOADING STRUCTURES PLAN

APPLICANT:	EXXON MOBIL CORPORATION & PTE PIPELINE LLC.
PROJECT:	POINT THOMSON PROJECT
LOCATION:	NORTH SLOPE BOROUGH, ALASKA
REFERENCE:	POA-2001-1082-M1
WATERBODY:	BEAUFORT SEA
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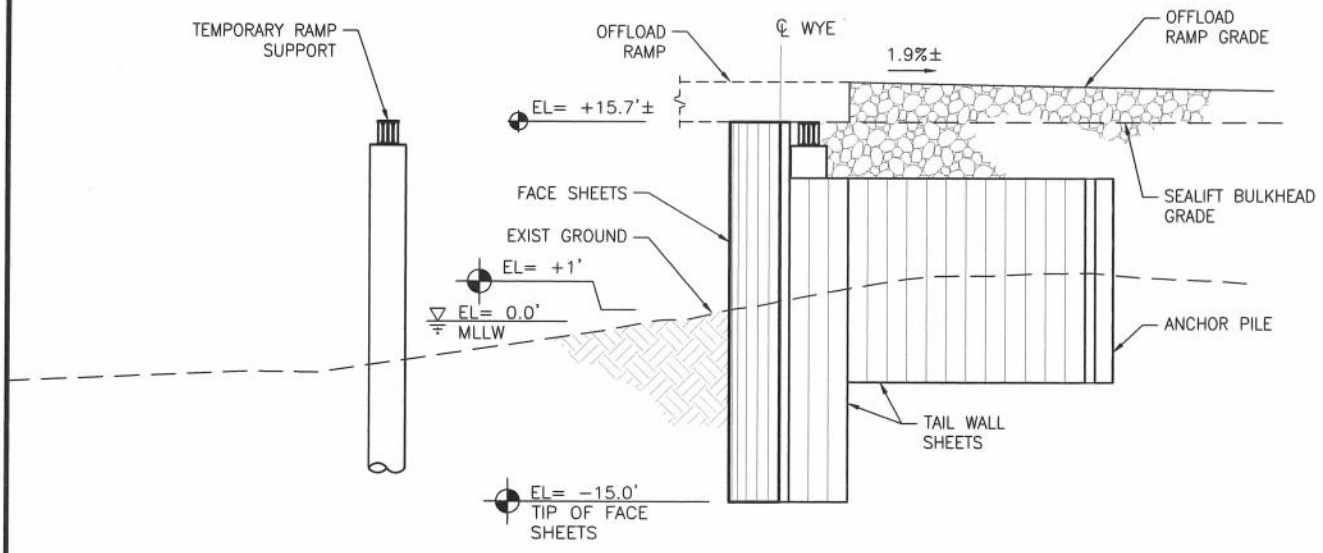

SEALIFT BULKHEAD SECTION

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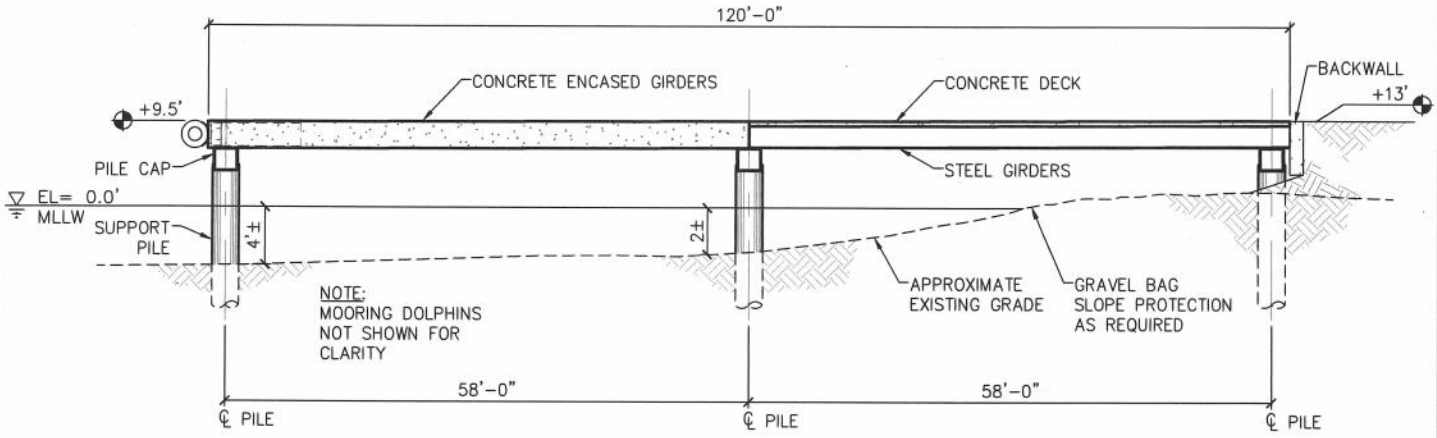

SERVICE PIER SECTION

NOT TO SCALE

BARGE OFFLOADING STRUCTURES SECTIONS

APPLICANT:	EXXON MOBIL CORPORATION & PTE PIPELINE LLC.
PROJECT:	POINT THOMSON PROJECT
LOCATION:	NORTH SLOPE BOROUGH, ALASKA
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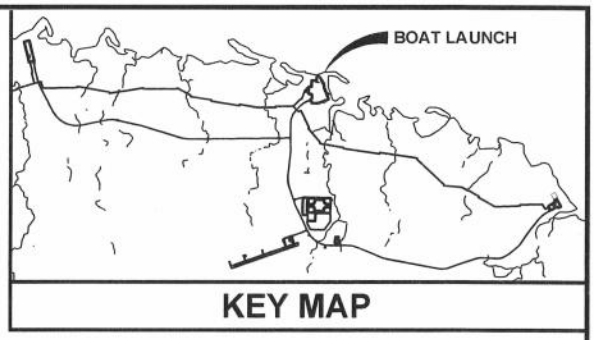
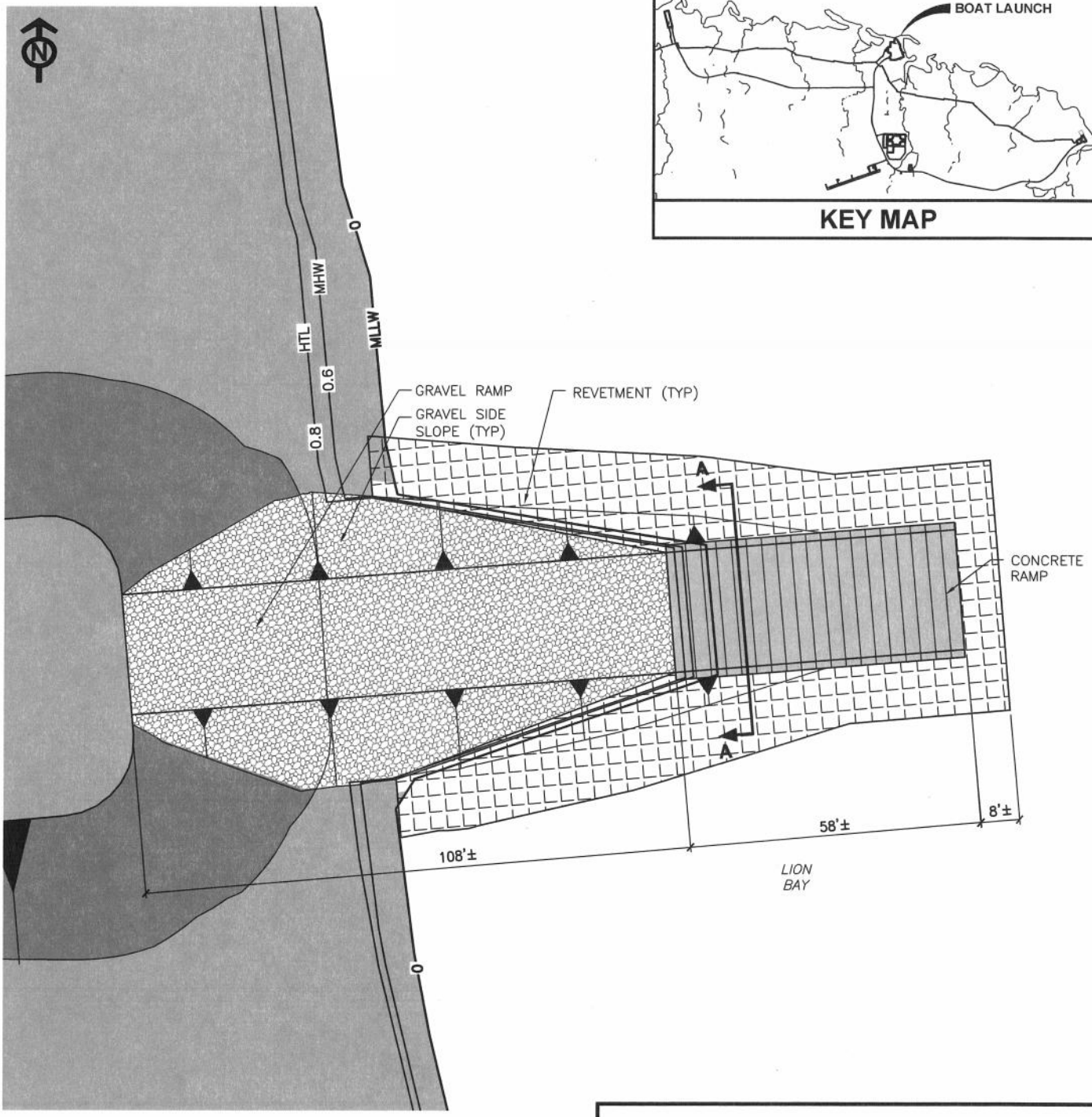
WATERBODY:	BEAUFORT SEA
DATE:	OCTOBER 2011

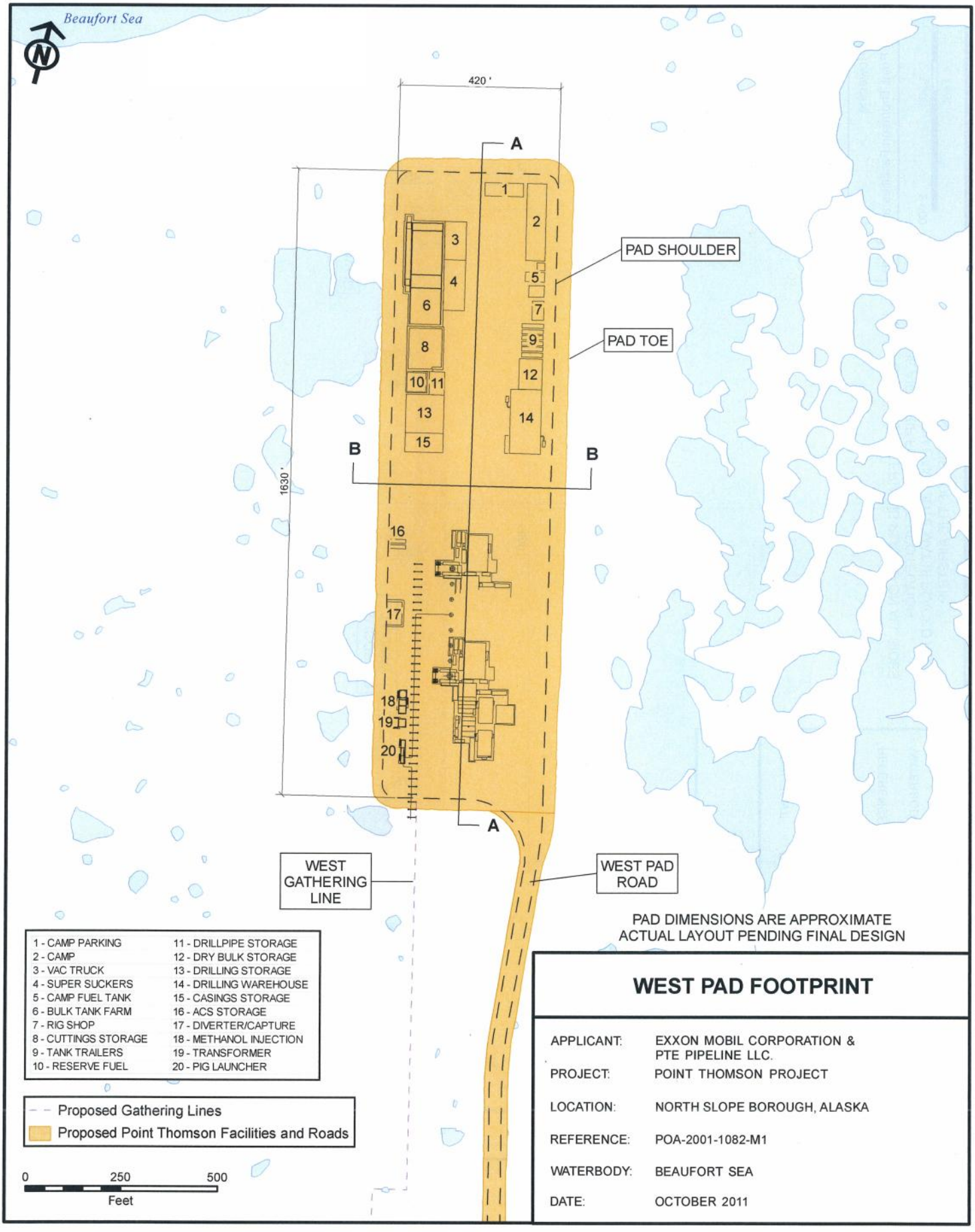


KEY MAP



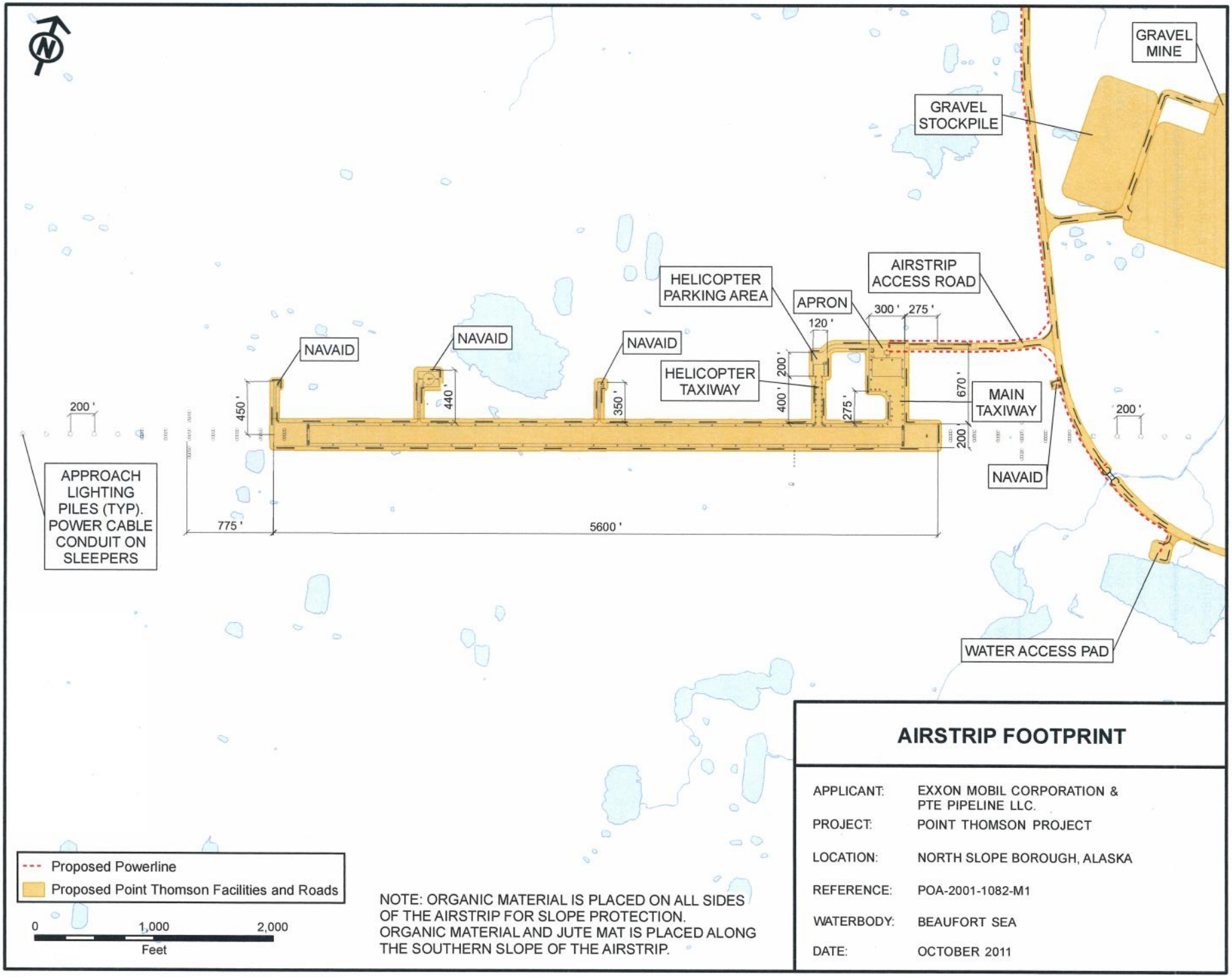
BOAT LAUNCH PLAN

APPLICANT:	EXXON MOBIL CORPORATION & PTE PIPELINE LLC.
PROJECT:	POINT THOMSON PROJECT
LOCATION:	NORTH SLOPE BOROUGH, ALASKA
REFERENCE:	POA-2001-1082-M1
WATERBODY:	BEAUFORT SEA
DATE:	OCTOBER 2011



WEST PAD FOOTPRINT

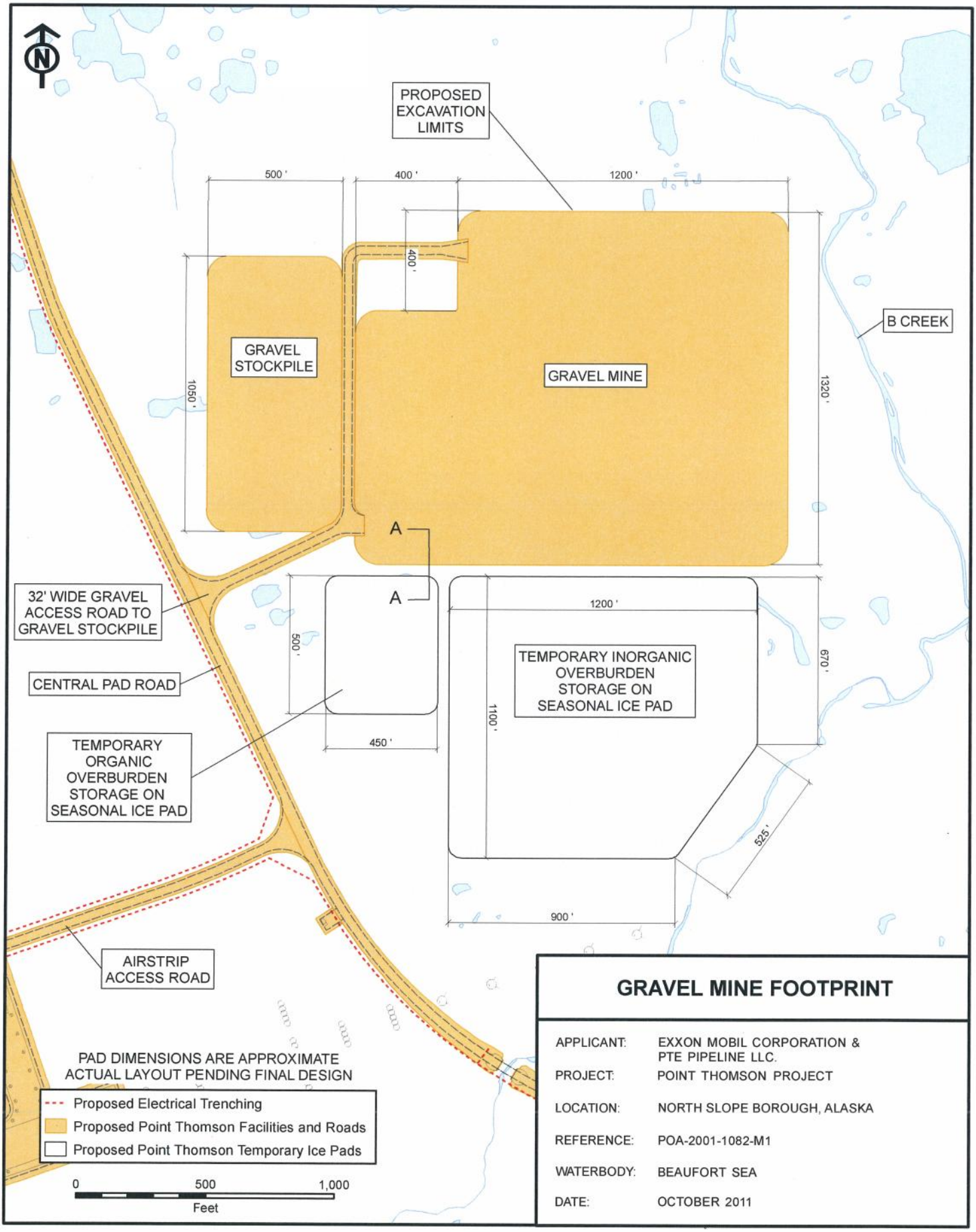
APPLICANT:	EXXON MOBIL CORPORATION & PTE PIPELINE LLC.
PROJECT:	POINT THOMSON PROJECT
LOCATION:	NORTH SLOPE BOROUGH, ALASKA
REFERENCE:	POA-2001-1082-M1
WATERBODY:	BEAUFORT SEA
DATE:	OCTOBER 2011



NOTE: ORGANIC MATERIAL IS PLACED ON ALL SIDES OF THE AIRSTRIP FOR SLOPE PROTECTION. ORGANIC MATERIAL AND JUTE MAT IS PLACED ALONG THE SOUTHERN SLOPE OF THE AIRSTRIP.

AIRSTRIP FOOTPRINT

APPLICANT:	EXXON MOBIL CORPORATION & PTE PIPELINE LLC.
PROJECT:	POINT THOMSON PROJECT
LOCATION:	NORTH SLOPE BOROUGH, ALASKA
REFERENCE:	POA-2001-1082-M1
WATERBODY:	BEAUFORT SEA
DATE:	OCTOBER 2011



GRAVEL MINE FOOTPRINT

APPLICANT:	EXXON MOBIL CORPORATION & PTE PIPELINE LLC.
PROJECT:	POINT THOMSON PROJECT
LOCATION:	NORTH SLOPE BOROUGH, ALASKA
REFERENCE:	POA-2001-1082-M1
WATERBODY:	BEAUFORT SEA
DATE:	OCTOBER 2011

Public meetings have been scheduled for December 5–15, 2011, to seek comment on the Draft EIS. The format for these meetings will consist of an open house, followed by an opportunity for the public to provide comments. Individuals may provide oral comments, which will be recorded by a court reporter. No decisions on the project will be made at the public meeting. The open houses will allow the public to view information and the Draft EIS, and to speak with project team members in preparation for oral comments.

There will be a half-hour break after each open house (except in Kaktovik), followed by public comment. Inupiaq interpretation will be provided in Kaktovik, Nuiqsut, and Barrow. The meeting dates and locations will be as follows:

Anchorage - Monday, December 5, 2011
Z.J. Loussac Library
3600 Denali Street
Open House 4-6 pm
Public Comment 6:30-8 pm

Fairbanks - Wednesday, December 7, 2011
Wedgewood Resort - Taiga Center
212 Wedgewood Drive
Open House 4-6 pm
Public Comment 6:30-8 pm

Kaktovik - Monday, December 12, 2011
Marsh Creek Inn
901 Hula Hula Avenue
Open House 6-7:30 pm
Public Comment 7:30-9 pm

Nuiqsut - Tuesday, December 13, 2011
Trapper School
3310 3rd Avenue
Open House 4-6 pm
Public Comment 6:30-8 pm

Barrow - Thursday, December 15, 2011
Hopson Middle School
6501 Transit Street
Open House 4-6 pm
Public Comment 6:30-8 pm

Attachment 4 – ExxonMobil Handout

POINT THOMSON PROJECT

Point Thomson Project Environmental and Logistics Comparisons of the DEIS Alternatives

POINT THOMSON PROJECT

Summary of PTP DEIS Alternatives

- **Alternative B – Applicant's Proposed Project**
  - Coast based Central Pad (Wells & Facilities) and East/West Well Pads
  - 12 miles of infield gravel roads connecting East/West Pads and airstrip
  - Infield gathering lines and 12" dia. 22-mile export pipeline to Badami
  - Coastal re-supply barging and module sealift barging direct to Central Pad
  - Seasonal ice roads to Endicott only needed during construction and drilling
  - 5,600 foot inland airstrip and one inland gravel mine
- **Alternative C – Moves project components inland and eliminates barging to reduce coastal impacts**
  - Central Pad is split into a Well Pad for drilling at the existing Central Pad and a second Processing Pad for facilities is located 2 miles inland
  - Gathering lines, infield gravel roads, and Export Pipeline are moved inland
  - East and West pads moved half mile inland
  - Includes an inland 44-mile gravel road from Point Thomson to Endicott
  - Seasonal ice roads to Endicott only needed during construction phase
  - No coastal re-supply barging; Module sealift barging to Deadhorse only
  - Longer export pipeline parallels the 44-mile gravel road to Endicott
  - 5,600 foot inland airstrip and multiple inland gravel mines
- **Alternative D – Similar to C except there is no road to Endicott**
  - Ground access limited to seasonal ice road during construction, drilling and operations
  - No coastal re-supply barging; Module sealift barging to Deadhorse only
  - The Export Pipeline is moved inland and goes to Badami rather than Endicott
  - 5,600 foot inland airstrip and one inland gravel mine
- **Alternative E - Minimizes gravel footprint to reduce wetlands impacts**
  - Pads, mine and pipelines similar to Alternative B and barging is allowed
  - Infield gravel roads to East/West Pads are eliminated and rely on seasonal ice road access and helicopter transport
  - Reduced East/West Pad gravel area; use of multi-year ice pads during drilling
  - Inland airstrip shortened to 3,700 feet to minimize gravel footprint

DEIS Alternative B

POINT THOMSON PROJECT EIS

Legend
Arctic National Wildlife Refuge
Existing Facilities
Water Body

Proposed Project Layout
Tundra Ice Road
Sea Ice Road
Gathering Pipeline
Export Pipeline
Road Centerline

Potential Water Source
Airstrip
Gravel Mine
Gravel Pads
Ice Pads

The data displayed is concept level and has not been engineered.

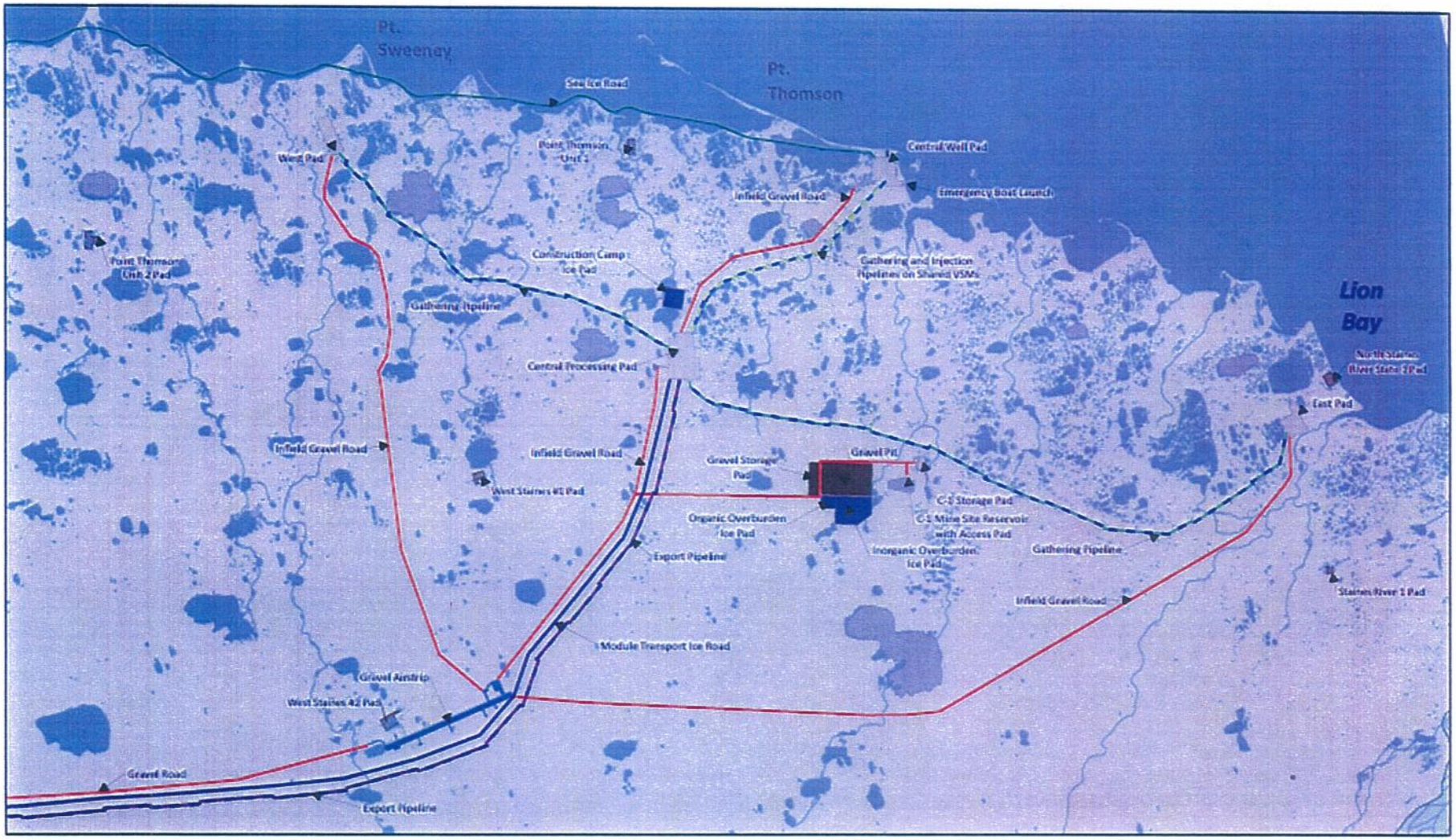
0 1 2 Miles

N

Figure 2.4-6
Alternative B - Applicant's Proposed Action
Sheet 2 of 2

POINT THOMSON PROJECT

DEIS Alternative C



POINT THOMSON PROJECT EIS

Legend

Proposed Project Layout

The data displayed is concept level and has not been engineered

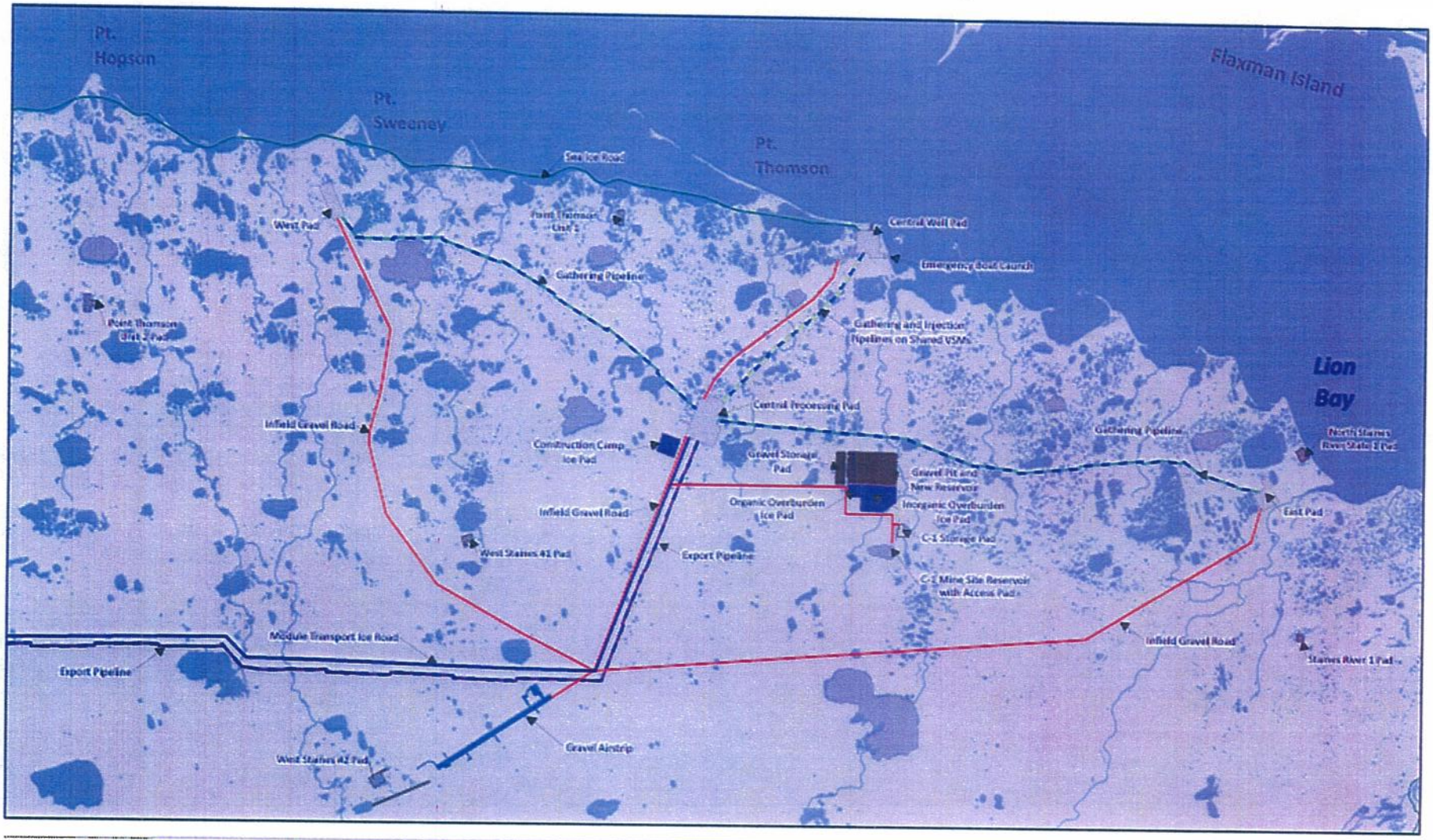
0 1 2 Miles

N

Figure 2.4-15
Alternative C - Inland Pads with Gravel Access Road
Sheet 2 of 2

POINT THOMSON PROJECT

DEIS Alternative D



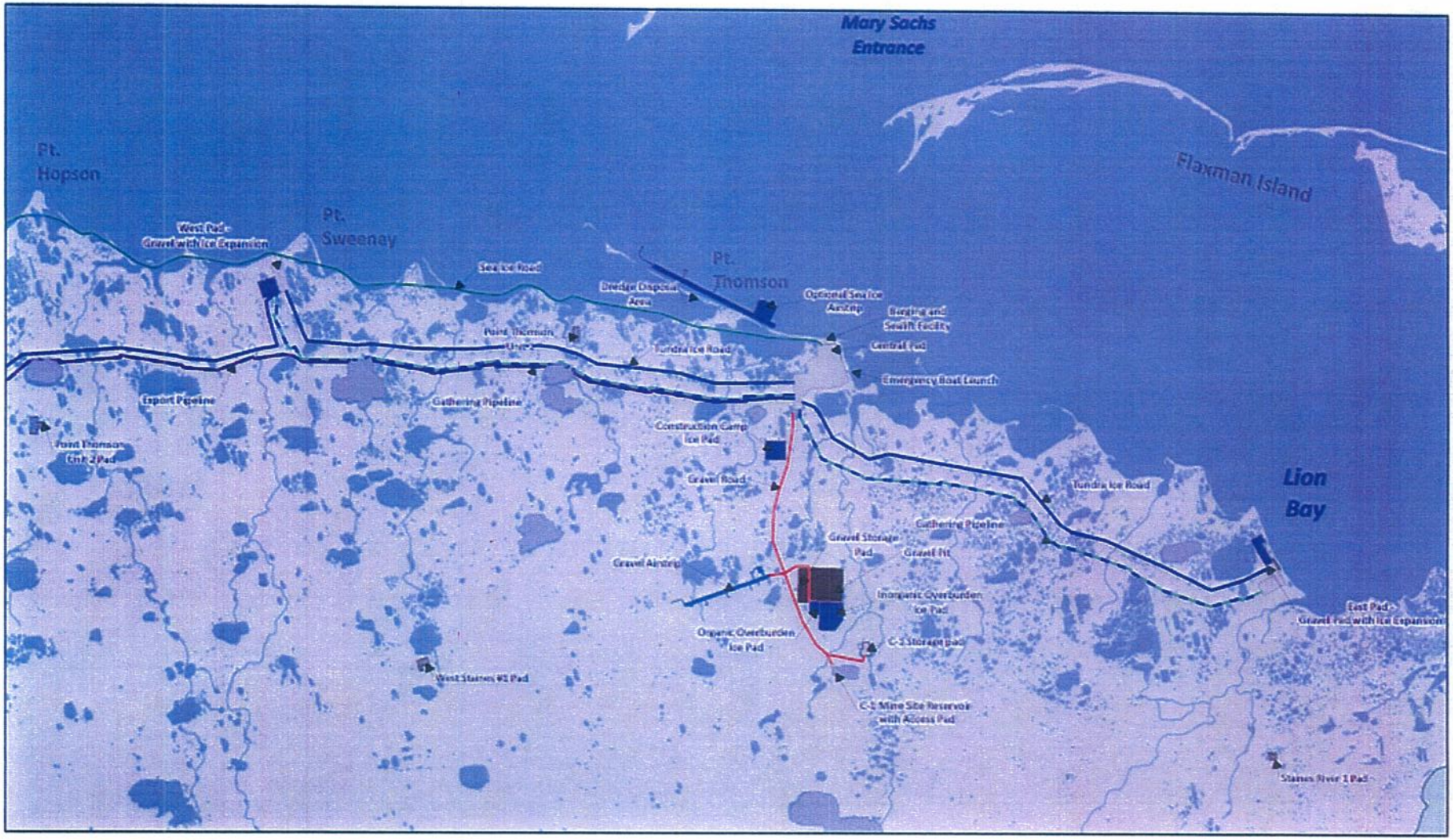
POINT THOMSON PROJECT EIS

The data displayed is concept level and has not been engineered.

Figure 2.4-22
Alternative D - Inland Pads with Seasonal Ice Access Road - Sheet 2 of 2

POINT THOMSON PROJECT

DEIS Alternative E



POINT THOMSON PROJECT EIS

Legend

Proposed Project Layout

The data displayed is concept level and has not been engineered.

0 1 2 Miles

N

Figure 2.4-27
Alternative E - Coastal Pads with Seasonal Ice Roads
Sheet 2 of 2

POINT THOMSON PROJECT

ExxonMobil's Environmental and Logistics Comparison of the PTP DEIS Alternatives

The bar charts in the following pages compare key environmental and logistical aspects of Action Alternatives C, D, and E versus Alternative B (ExxonMobil's Proposed Project) in the following categories:

- Environmental - Wetlands Footprint
- Environmental - Water Consumption
- Logistics - Land Transport
- Logistics - Barging
- Logistics - Helicopters
- Logistics - Fixed Wing

Air emissions is another key environmental aspect to compare. Fuel consumption for construction, drilling and operations activities associated with the bar chart categories directly correlates to air emissions. Qualitative differences in air emissions between the Alternatives can be compared based on the difference between bars for each category Transport.

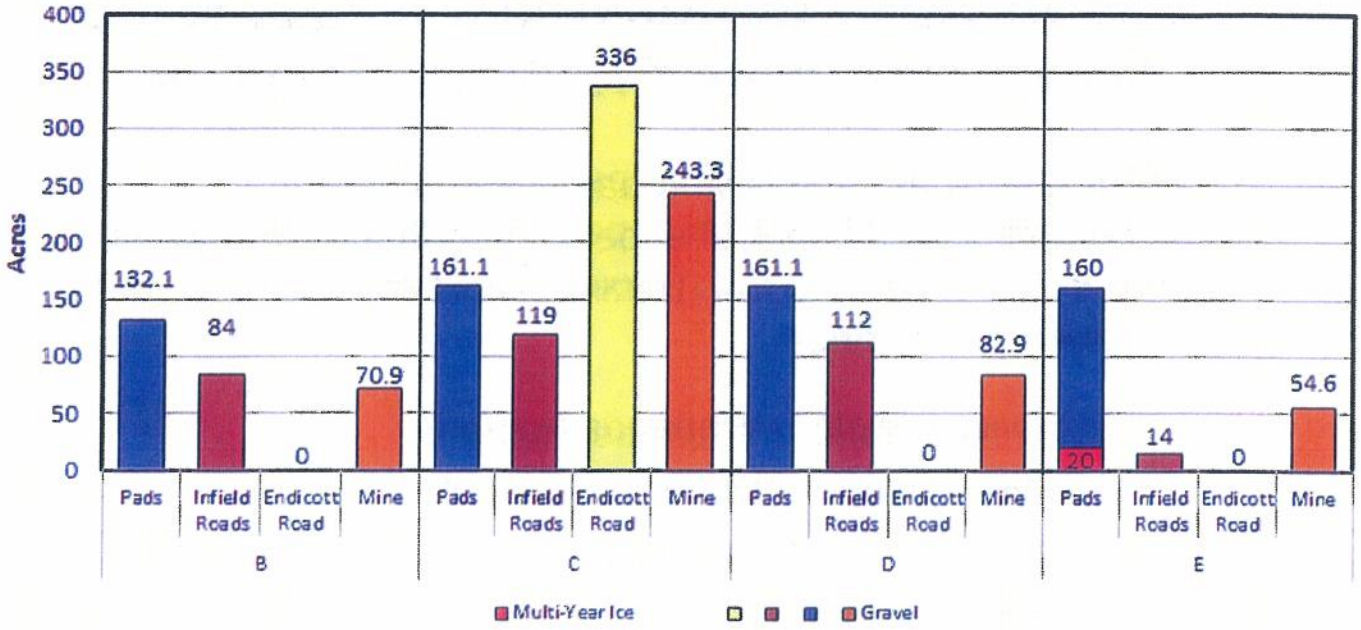
Likewise qualitative differences in noise and visual impacts can be compared based on the difference between bars for each category (especially in the helicopter and fixed with categories).

Conclusion

Of the four DEIS Action Alternatives, Alternative B (ExxonMobil's Proposed Project) has the least overall environmental impact.

POINT THOMSON PROJECT

Wetlands Fill



Alternative B (Total 287 acres)

Mines	57.2-acre Mine Site, 13.7-acre Stockpile
Pads & Airstrip	1,573K CY, 132.1 Acres
Infield Roads	12 Miles, 627K CY= 84 Acres

Alternative C (Total 859 acres)

Mines	66.8-acre Mine Site, 17.2-acre Stockpile.
Endicott Road:	5 Mine Sites= 125 Acres, 5 ea. 100K CY Stockpiles= 34.3 Acres
Pads & Airstrip	1,644 CY, 161 Acres
Infield Roads	17 Miles, 915K CY= 119 Acres
Endicott Road	2,375K CY Gravel Road= 336 Acres

Alternative D (Total 356 acres)

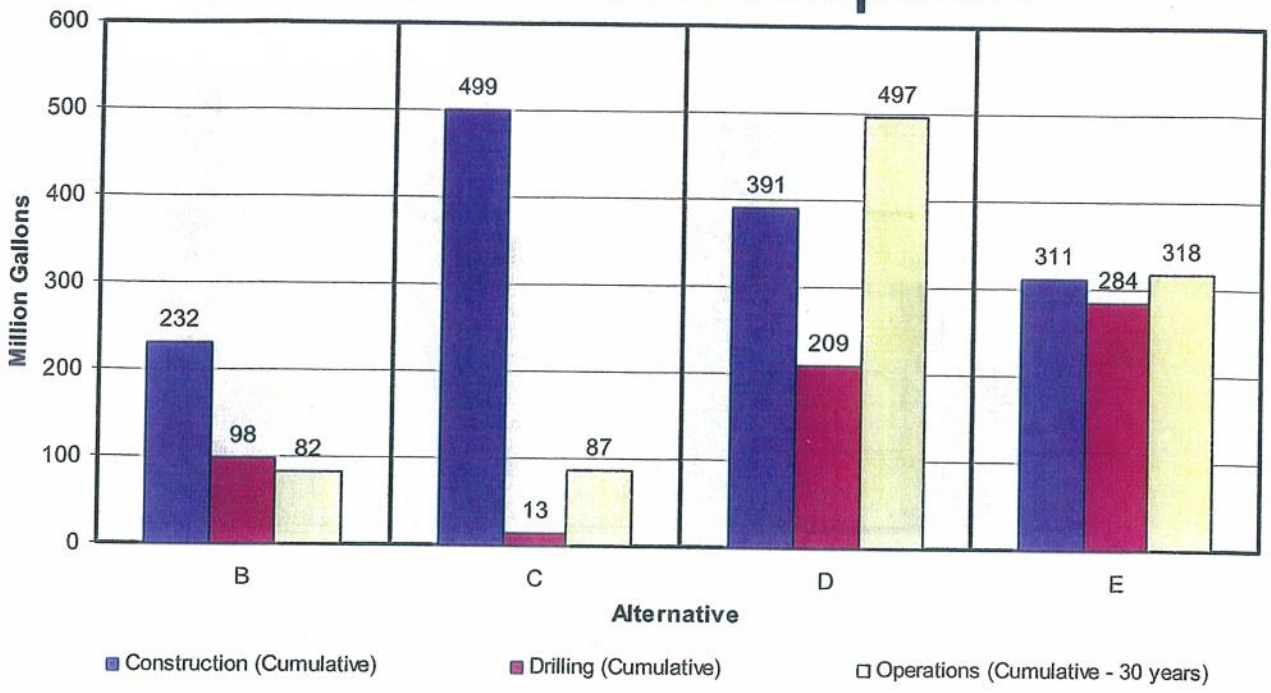
Mines	65.7-acre Mine Site, 17.2-acre Stockpile
Pads & Airstrip	1,658K CY, 161 Acres
Infield Roads	16 Miles, 862K CY= 112 Acres
Ice Road	To Endicott constructed every year to every other year

Alternative E (Total 208 + 20 acres for multi-year ice pads)

Mines	43.2-acre Mine Site, 11.4-acre Stockpile
Pads & Airstrip	1,592K CY, 140 Acres (+20 acres for multi-year ice pads)
Infield Roads	2 Miles, 108K CY= 14 Acres
Infield Ice Roads	Constructed every year

POINT THOMSON PROJECT

Water Consumption



Construction:

The most significant factors affecting water use in each Alternative are the differences in ice road construction and maintenance requirements. Alternatives C & D require two ice roads for each year of construction, as well as additional construction workforce. Alternative E is mostly driven by infield ice road construction and multi-year ice pad construction on the East and West Pads.

Drilling:

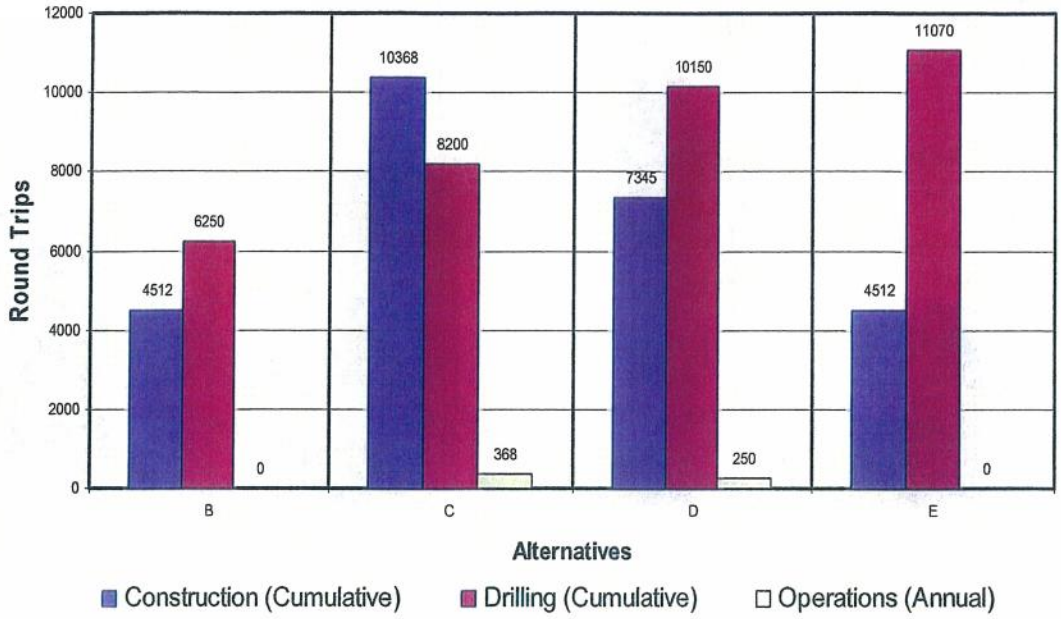
Similar to construction, drilling water consumption is primarily driven by ice road and pad differences. The secondary driver is the schedule extensions and required water to support people and equipment consumption for an extended period of time. Alternative C does not have drilling associated ice roads once the gravel road is completed; therefore, the difference is primarily the result the extended drilling schedule. Alternative D will require an ice road for each of the 2 years drilling extends beyond the Alternative B drilling schedule. Alternative E will require an ice road to Endicott for each of the two drilling seasons beyond the Alternative B drilling schedule, as well as infield ice roads for each year of schedule extension.

Operations:

Operational water consumption differences are also driven primarily by differences in ice road requirements. Alternative C does not require any ice roads due to the use of the gravel road to Endicott, but it will require additional operations staffing to manage the gravel road. Alternative D was originally assumed to require an ice road every other year to Endicott for operations resupply due to the lack of barge resupply access. If this ice road is required every year, (as assumed in the DEIS) then water consumption would double (to 636 M gallons) for the life of the Project. The significant increase in Alternative E water consumption is a result of the annual infield ice road construction.

POINT THOMSON PROJECT

Logistics- Land Transport



Construction:

Eliminating barging in Alternatives C and D significantly increases the frequency of trucking via ice roads to and from Point Thomson and the quantity of fuel stored at Central Pad. Each potential coastal barge load is shifted onto 10 trucks in the limited 3-month season of ice road transport. Construction of the gravel road to Endicott in Alternative C requires a larger civil scope with a corresponding increase in truck trips. Alternatives C and D would also have the need to transport 6 million gallons of diesel fuel over the ice road (600 truckloads) to support construction activities through the spring, summer and fall seasons.

In Alternatives C and D, sealift barges would have to offload facility modules of up to 1,300 tons at Prudhoe Bay where they would then be stored and preserved on gravel pads (as yet to be determined) until the winter ice road seasons. These 19 modules are too large to be transported via trucks and will transit via Self Propelled Module Transporters (SPMTs) on heavy haul ice roads. Ice road module transport results in diversions of the other truck traffic to bypass ice roads.

Drilling:

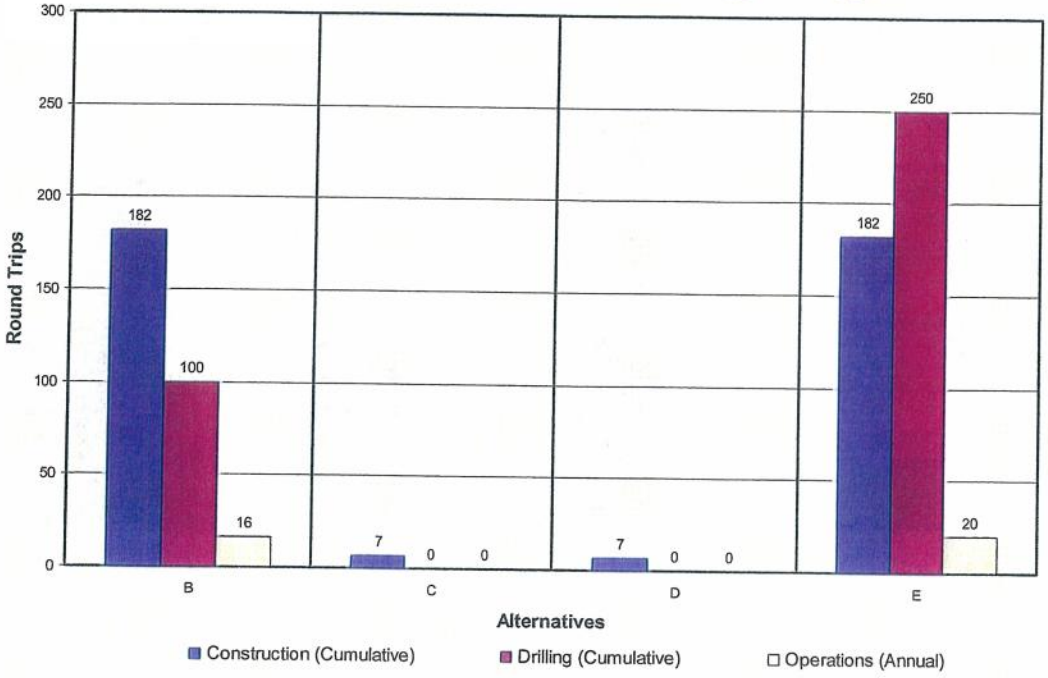
Eliminating barging in alternatives C and D directly affects the required number of truck trips via road and onward via ice roads to and from Point Thomson. This shifts the cargo back onto trucks in the limited 3-month season of ice road transport. The lack of infield gravel roads in Alternative E extends the years of drilling with multiple mobilizations of equipment and materials from a 3-year program to 5.5 years. There is also more trucking due to the shorter airstrip in Alternative E.

Operations:

Similar to construction and drilling, eliminating coastal barging during operations in Alternatives C (permanent gravel road) and D (annual ice road) shifts cargo to an increased number of trucks. Alternative B and E rely on barge and air cargo transportation and are not dependent on trucking.

POINT THOMSON PROJECT

Logistics- Barging



Construction:

Alternative B and E rely on coastal barging for a significant portion of cargo/equipment delivery to Central Pad (similar to the 188 barge round trips used to support the 2008-10 drilling program). Sealift barges would deliver large facility modules directly to Central Pad for Alternative B and E. The lack of barge access to Point Thomson in Alternatives C and D require 7 sealift barge trips to deliver modules to the Prudhoe Bay West Dock (60 miles West of Central Pad) for storage and later transport to Point Thomson via ice road. The lack of barge access also results in inefficient redesign and construction of smaller modules capable of moving via ice road.

Drilling:

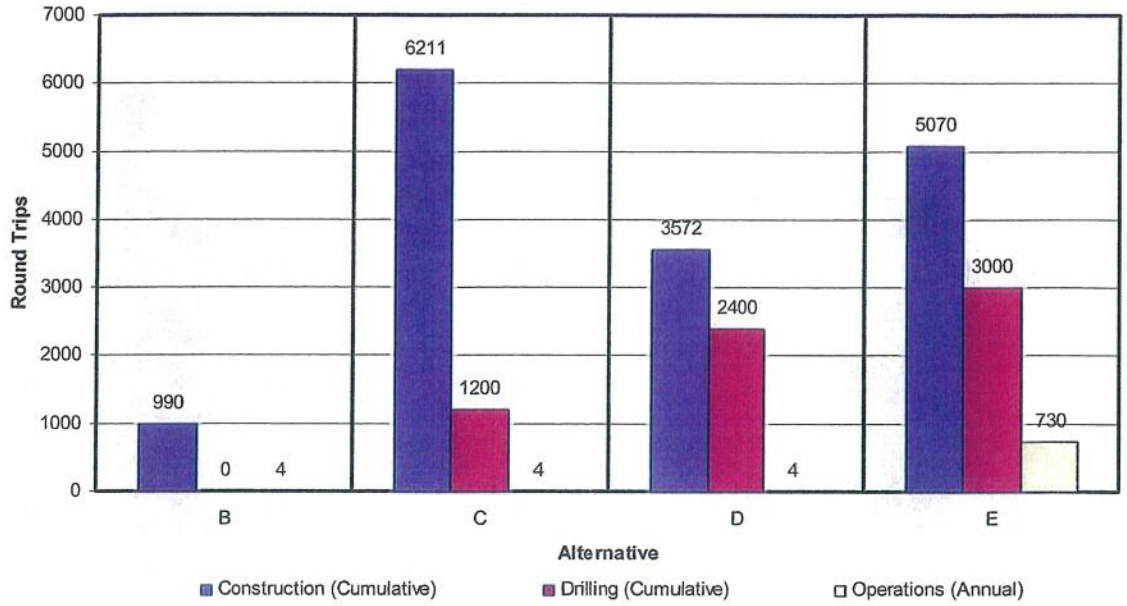
Elimination of coastal barging in Alternatives C and D shifts the transport of cargo to truck transport via ice road. The lack of infield gravel roads to the East and West Pads in Alternative E limits rig mobility and drilling activity, consequently requiring a longer drilling program with a significantly increased number of barge trips needed for the additional equipment and supplies needed to be stockpiled during the summer season in preparation for movement to the pads in winter. The shorter airstrip in Alternative E also limits air freight resupply and redirects these volumes to barge and truck transport.

Operations:

The elimination of barging in Alternatives C and D shifts the coastal barge cargoes overland via gravel or ice roads. While Alternative C can use the gravel access road during operations, Alternative D will require annual ice roads for resupply. Alternative E will require more barging in operations due to a shorter airstrip and resulting use of smaller capacity cargo aircraft.

POINT THOMSON PROJECT

Logistics- Helicopters



Alternative E Would Require a Helicopter Base:

A distinguishing aspect of Alternative E is that a full-time helicopter facility with base, hangers, fuel, and crews would need to be constructed at the airstrip and operated to support daily round trips to the satellite pads during 9 months of the year. During construction there would be some periods, such as when gravel is reworked at the East and West Pads, when up to 12 flights total to those pads would be needed in a single day. During drilling, all crews would need to be shuttled to the pads by helicopter until ice roads are available in winter. During operations daily helicopter flights would be required for 9 months of each year to access the East and West Pads until the infield ice roads are ready for use. Over the 30 year operational life of the project, approximately 21,900 infield helicopter flights could be required to East/West Pads.

Construction Under Alternatives C and D:

Constructing the all season gravel road in Alternative C will require extensive helicopter support for workforce rotation. The delay in completion of the permanent airstrip at Point Thomson for Alternatives C and D also increases the need for helicopter support that would have been converted to fixed wing a year earlier in Alternatives B.

Drilling Under Alternatives C and D:

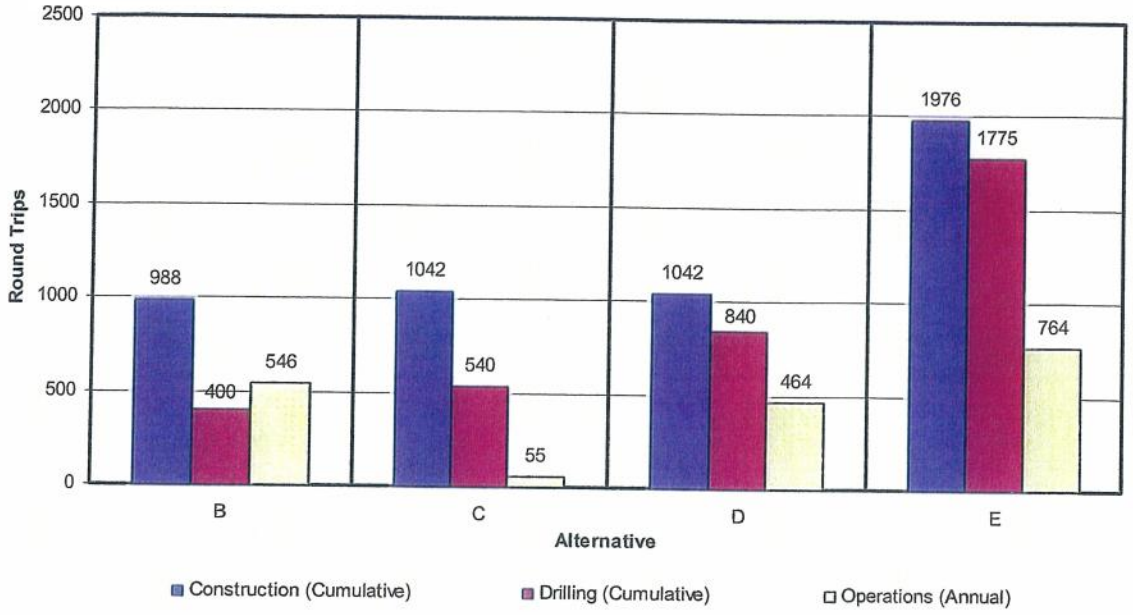
Under Alternatives C and D, the rig is mobilized prior to completion of the airstrip. Therefore, the early phase of the drilling program would require the support of helicopters in place of fixed-wing aircraft for part of the frequent shift changes of work force and crew.

Operations Under Alternatives B, C, and D:

Under Alternatives B, C, and D, operations will require minimal helicopter support.

POINT THOMSON PROJECT

Logistics- Fixed Wing



Drilling and Construction:

The 5,600-foot airstrip that is a component in Alternatives B, C, and D accommodates 30-passenger aircraft and regular cargo aircraft of 24,000-pounds (DC-6), as well as heavy aircraft with a 45,000-pound capacity (C130 type). The shorter 3,700-foot airstrip in Alternative E would require the use of 15 to 17 passenger aircraft for people, and it limits cargo aircraft to Twin Otters / Casa type with only a 5,000-pound capacity. This will effectively double the required air flights during construction and quadruple the number flights during drilling for Alternative E compared to Alternative B.

Operations:

The reduction in length of the airstrip to 3,700 feet in Alternative E would eliminate charter options from locations other than Deadhorse. It would also eliminate the possibility of accommodating emergency flights for response to any event that requires cargo or equipment over about 5,000 lbs. to be flown in when no ice road exists. Alternative C will require the least amount of annual aircraft support due to the availability of the permanent gravel road to Endicott.

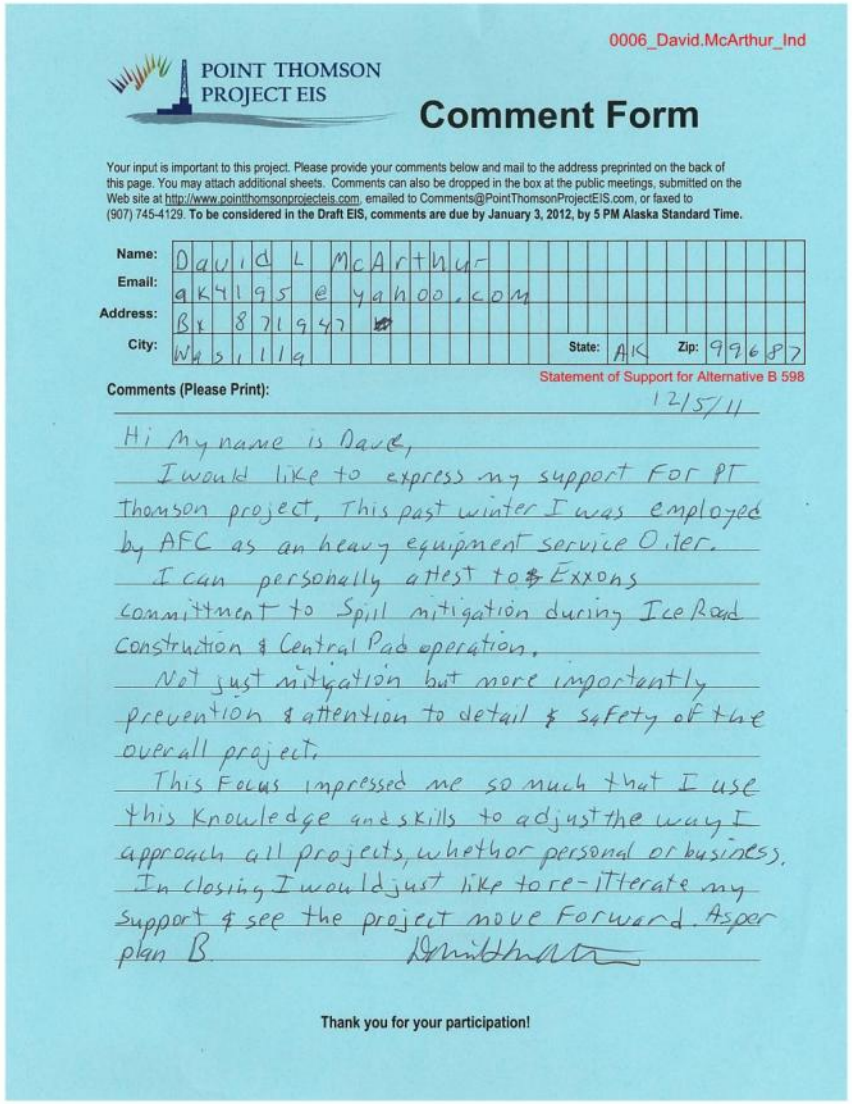
Attachment 5 –Comment Documents/Responses

Comment	Response
Davis, Cecile 0001_Lorali.Simon_Ind **From:** Alcantra, Rosetta M. **Sent:** Friday, December 02, 2011 2:01 PM **To:** Adair, Tina; Davis, Cecile **Subject:** 120212_Lorali Simon_Support Alternative B, Point Thomson DEIS **From:** Baij, Harry A Jr POA [mailto:Harry.A.Baij@usace.army.mil] **Sent:** Friday, December 02, 2011 1:52 PM **To:** Lorali Simon **Cc:** Begier, Erin; Alcantra, Rosetta M. **Subject:** RE: Support Alternative B, Point Thomson DEIS Hi Lorali and thank you for reviewing the Point Thomson Project Draft EIS and written comment submittal. Your comments will be given full consideration and included in the public record. The comment period will be open until Jan 3, 2012. *Harry A. Baij Jr.* US Army Corps of Engineers, Alaska harry.a.baij@usace.army.mil Office: 907.753.2784 Cell: 907.350.5097 www.poa.usace.army.mil/reg **From:** Lorali Simon [mailto:lorali.simon@gmail.com] **Sent:** Tuesday, November 29, 2011 9:29 AM **To:** Baij, Harry A Jr POA **Subject:** Support Alternative B, Point Thomson DEIS Mr. Baij, Statement of Support for Alternative B 94 I support Alternative B outlined in the Point Thomson Draft EIS produced by the US Army Corps of Engineers. Alternative B provides the safest, most environmentally responsible solution for developing Point Thompson, and ensures a minimal environmental footprint by incorporating a combination of summer coastal barging, winter ice roads, aviation, and in-filed roads. Through Alternative B, ExxonMobil will implement comprehensive mitigation measures to minimize impact on tundra, wildlife, aquatic resources, and subsistence activities. The Point Thomson project will provide wide-ranging benefits to Alaska in the form of new business opportunities, jobs, and revenues. Approval of the Point Thomson project, as proposed in Alternative B, is vital to the development of this world-class resource and North Slope gas commercialization. Direct benefits to the State of Alaska from Point Thomson include training and jobs for Alaskans, new revenues to the state and local governments, increased throughput for the Trans-Alaska oil pipeline, and increased business activity and revenue for the private sector. Point Thomson is a highly-technical project with high costs. Unnecessary requirements that provide very little, if any, incremental environmental benefits, should be avoided as to not compromise the economic viability of the project. The in-field roads included in Alternative B have been carefully routed to minimize the gravel footprint and for the efficient pass through of water. Moving roads inland as proposed in Alternative C and D would increase the gravel footprint and be less effective in maintaining natural drainage patterns of the project area. Alternatives C and D would move project components inland and eliminate barging, which is an 1	94 Comment noted; no action required.

Comment	Response
established and safe means of supply for North Slope communities, including Prudhoe Bay. ExxonMobil has conducted safe barging operations in accordance with the Alaska Eskimo Whaling Commission Conflict Avoidance Agreement and in direct consultation with local whaling communities. 188 barging trips in support of Point Thomson have occurred with no impacts to marine mammals or subsistence. Alternatives C and D both result in inefficient logistical support and adds unnecessary challenges. Eliminating summer barging would result in increased costs, schedule delays, and increased tundra traffic. The 44-mile gravel road from Endicott to Point Thomson as proposed under Alternative C would create a much larger tundra footprint. Current North Slope experience at Alpine and Badami demonstrates that a gravel road is not necessary to support Point Thomson. However, not having a road connecting to Prudhoe Bay does make the combination of barging, ice roads, air access and in-field gravel roads essential. Alternative E would eliminate in-field gravel roads and shorten the airstrip. This alternative relies solely on helicopters and seasonally limited off-road vehicles for transportation to East and West pads for nine months of the year. There is no North Slope precedent for a production facility with such limitations. Moreover, inability to fly in poor weather introduces unnecessary safety risks for personnel, as well as emergency response limitations and operational inefficiencies. The longer runway in Alternative B provides better access in bad weather, reduces the number of flights by allowing larger aircraft for routine cargo shipments and allows for aircraft to transport larger equipment capabilities in the event of an emergency. Sincerely, Lorali Simon Palmer, AK	Comment letter 001 continued.
Davis, Cecile 0002_Patrick.Egger_Ind **Sent:** Tuesday, November 29, 2011 12:25 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Patrick S. Egger Email: Pat@JagoCM.com Contact me through email: Yes Address: 850 E. Sulatna Bay City: Wasilla State: AK Zip: 99654 Contact Phone: 907-864-0044 Add me to mailing list: Yes Comments: Point Thomson Project Comments: Statement of Support for Alternative B 96 I am very much in favor of the Point Thomson Project being permitted. Please take into consideration the importance of this project to the residents of Alaska by providing construction and long term jobs here in the State. The State of Alaska will also derive a positive benefit from its construction and production. My support is for alternative "B", considering it is the safest and most environmentally friendly solution for the project's development and operations. Alternative "B" is also the most cost effective and sensible manner for developing the field when considering all aspects of the project. Sincerely, Patrick S. Egger	96 Comment noted; no action required.

Comment	Response
Davis, Cecile 0003_Derek.Miller_Ind **Sent:** Wednesday, November 30, 2011 8:41 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Derek Miller Email: derek.miller@alaska.edu Address: PO Box 70502 City: Fairbanks State: AK Zip: 99707 Contact Phone: 907 978-1360 Statement of Support for Alternative B 97 Comments: I would like to submit comments in support of Alternative B in the DEIS for ExxonMobil's Point Thomson natural gas condensate development project. This alternative ensures that the impact on the environment is minimal. It's important to the well-being of Alaska and the U.S. that we develop our natural resources and Pt. Thomson is an important part of that effort. Four big reasons that these resources need to be developed responsibly: 1) Increased revenues to the State of Alaska and private sector; 2) creation of jobs; 3) new business opportunities; and 4) increased Trans-Alaska Pipeline system (TAPS) throughput which is essential to keep TAPS going.	97 Comment noted; no action required.
Davis, Cecile 0004_Gary.Jenkins_Ind **Sent:** Wednesday, November 30, 2011 8:38 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Gary Jenkins Email: gjenkins@uskh.com Address: 544 4th Ave. Ste 102 City: Fairbanks State: AK Zip: 99701 Contact Phone: Statement of Support for Project 99 Comments: It is time to approve projects like these. With all the instant media coverage, current environmental regulations, and multiple watch dogs, developers of such projects know they must develop the best technologies and pursue the most environmentally friendly and safe methods of development possible. The USA leads the way in this regard and it is time to permit projects that meet reasonable standards.	99 Comment noted; no action required.

Comment	**Response**
Davis, Cecile 0005_Genevieve.Schok_Ind **Sent:** Thursday, December 01, 2011 8:21 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Genevieve Schok Email: genevieve@flowline-alaska.com Address: 2350 Waters Edge Lane City: Fairbansk State: AK Zip: 99709 Contact Phone: Statement of Support for Alternative B 100 Comments: Alternative B provides the safest, most environmentally-responsible solution for developing Point Thomson's resources in a timely, cost-effective manner. Alaska needs these jobs.	100 Comment noted; no action required.

Comment	Response
	598 Comment noted; no action required.

0006_David.McArthur_Ind

POINT THOMSON PROJECT EIS

Comment Form

Your input is important to this project. Please provide your comments below and mail to the address preprinted on the back of this page. You may attach additional sheets. Comments can also be dropped in the box at the public meetings, submitted on the Web site at http://www.pointthomsonprojecteis.com, emailed to Comments@PointThomsonProjectEIS.com, or faxed to (907) 745-4129. **To be considered in the Draft EIS, comments are due by January 3, 2012, by 5 PM Alaska Standard Time.**

Name: David L McArthur
Email: gk4195@yahoo.com
Address: Bx 871947
City: Wasilla State: AK Zip: 99687

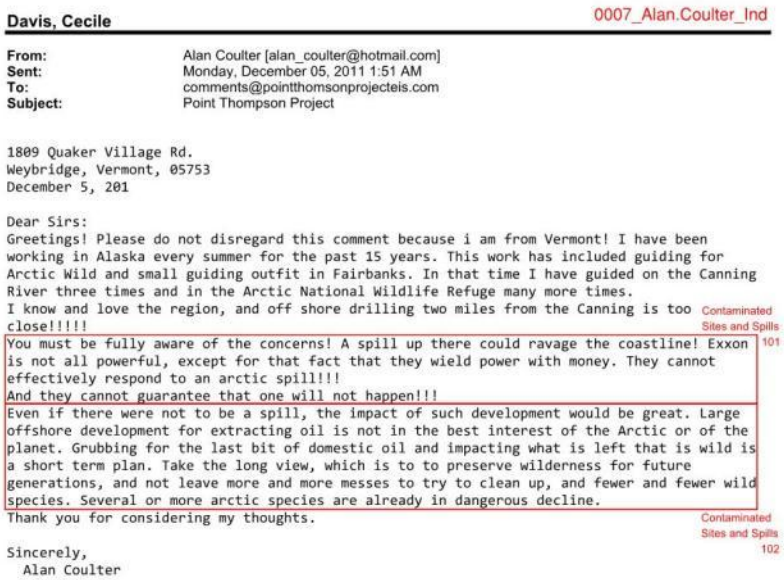
Statement of Support for Alternative B 598

Comments (Please Print):

12/5/11

Hi my name is Dave,
I would like to express my support For PT Thomson project, This past winter I was employed by AFC as an heavy equipment service Oiler.
I can personally attest to $ Exxons committment to Spill mitigation during Ice Road Construction & Central Pad operation.
Not just mitigation but more importantly prevention & attention to detail & safety of the overall project.
This Focus impressed me so much that I use this Knowledge and skills to adjust the way I approach all projects, whether personal or business.
In closing I would just like to re-itterate my support & see the project move Forward. As per plan B.

Thank you for your participation!

Comment	**Response**
	101 Comment noted; no action required. 102 Comment noted, no action required.

Davis, Cecile 0007_Alan.Coulter_Ind

From: Alan Coulter [alan_coulter@hotmail.com]
Sent: Monday, December 05, 2011 1:51 AM
To: comments@pointthomsonprojecteis.com
Subject: Point Thompson Project

1809 Quaker Village Rd.
Weybridge, Vermont, 05753
December 5, 201

Dear Sirs:
Greetings! Please do not disregard this comment because i am from Vermont! I have been working in Alaska every summer for the past 15 years. This work has included guiding for Arctic Wild and small guiding outfit in Fairbanks. In that time I have guided on the Canning River three times and in the Arctic National Wildlife Refuge many more times.
I know and love the region, and off shore drilling two miles from the Canning is too close!!!!! Contaminated Sites and Spills

You must be fully aware of the concerns! A spill up there could ravage the coastline! Exxon is not all powerful, except for that fact that they wield power with money. They cannot effectively respond to an arctic spill!!! 101
And they cannot guarantee that one will not happen!!!

Even if there were not to be a spill, the impact of such development would be great. Large offshore development for extracting oil is not in the best interest of the Arctic or of the planet. Grubbing for the last bit of domestic oil and impacting what is left that is wild is a short term plan. Take the long view, which is to to preserve wilderness for future generations, and not leave more and more messes to try to clean up, and fewer and fewer wild species. Several or more arctic species are already in dangerous decline.

Thank you for considering my thoughts. Contaminated Sites and Spills 102

Sincerely,
Alan Coulter

Comment	Response
Davis, Cecile 0008_Charles.Becker_Bus **Sent:** Monday, December 05, 2011 12:07 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Charles Becker Email: cbecker39@yahoo.com Address: 3705 Arctic Blvd., #174 City: Anchorage State: AK Zip: 99503 Contact Phone: 907-947-0215 Comments: Charles F. Becker Becker & Associates, LLC 3705 Arctic Blvd., #174 Anchorage, Alaska 99503 Department of the Army U.S. Army Engineer District, Alaska Regulatory Division P.O. Box 6898 JBER, Alaska 99506-0898 Ref: Point Thomson Project Draft Environmental Impact Statement (Draft EIS) for the proposed development by Exxon Mobil Corporation and PTE Pipeline LLC (Applicant). Dear District Engineer: Statement of Support for Alternative B 599 I support Alternative B of the draft environmental impact statement because it would ensure a minimal environmental footprint by incorporating a combination of summer coastal barging, winter ice roads, aviation, and in-field roads. These features are essential to safe and efficient operations of the project. I am advised that through Alternative B, ExxonMobil will implement comprehensive mitigation measures to minimize impact on tundra, wildlife, aquatic resources, and subsistence activities. Additionally, the coastal barge route is outside the main fall migration corridor of bowhead whales. 1	599 Comment noted; no action required.

Comment	Response
Point Thomson is a highly-technical project with high costs. Unnecessary requirements that provide very little, if any, incremental environmental benefits, should be avoided as to not compromise the economic viability of the project. The in-field roads included in Alternative B have been carefully routed to minimize the gravel footprint and for the efficient pass through of water. The longer runway in Alternative B provides better access in bad weather, reduces the number of flights by allowing larger aircraft for routine cargo shipments and allows for aircraft to transport larger equipment capabilities in the event of an emergency. Moving roads inland as proposed in Alternative C and D would increase the gravel footprint and be less effective in maintaining natural drainage patterns of the project area. Moreover, the alternatives would eliminate barging, an established and safe means of supply for North Slope communities, including Prudhoe Bay. Eliminating summer barging would result in increased costs, schedule delays, and increased tundra traffic. ExxonMobil has conducted safe barging operations in accordance with the Alaska Eskimo Whaling Commission Conflict Avoidance Agreement and in direct consultation with local whaling communities. 188 barging trips in support of Point Thomson have occurred with no impacts to marine mammals or subsistence. Alternatives C and D both result in inefficient logistical support and add unnecessary challenges. The 44-mile gravel road from Endicott to Point Thomson as proposed under Alternative C would create a much larger tundra footprint. Current North Slope experience at Alpine and Badami demonstrates that a gravel road is not necessary to support Point Thomson. However, not having a road connecting to Prudhoe Bay does make the combination of barging, ice roads, air access and in-field gravel roads essential. Alternative E would eliminate in-field gravel roads and shorten the airstrip. This alternative relies solely on helicopters and seasonally limited off-road vehicles for transportation to East and West pads for nine months of the year. There is no North Slope precedent for a production facility with such limitations. Moreover, inability to fly in poor weather introduces unnecessary safety risks for personnel, as well as emergency response limitations and operational inefficiencies. Benefits to the State of Alaska from Point Thomson include training and jobs for Alaskans, new revenues to the state and local governments, increased throughput for the Trans-Alaska oil pipeline, and increased business activity and revenue for the private sector. Thank you for allowing me to comment. 2	Comment letter 008 continued.

Comment	Response
Davis, Cecile 0009_Michael.Miller_Ind **Sent:** Monday, December 05, 2011 9:10 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Michael Miller Email: mike.miller@gcinc.com Address: 9411 Kylie Circle City: Ancorage State: AK Zip: 99502 Contact Phone: 907-248-2171 Statement of Support for Alternative B 104 Comments: I support Alternative B. Of the five design alternatives considered, Alternative B provides the safest, most environmentally-responsible solution for developing Point Thomson's resources in a timely, cost-effective manner.	104 Comment noted; no action required.
Davis, Cecile 0010_Daniel.Anderson_Ind **Sent:** Monday, December 05, 2011 3:44 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Daniel Anderson Email: odannyboy@hotmail.com Address: 4210 Northwood City: Anchorage State: AK Zip: 99517 Contact Phone: 907-242-1277 Statement of Support for Project 106 Comments: The future of the Alaskan economy depends on New Oil & Gas being brought to market. Point Thomson has the ability to do that. Makes jobs for Alaskans (if Alaskans get the jobs)keeps our PFD intack other wisw we become taxpayers and the businesses up here benifit also. Drill Drill Drill and pump the oil & gas to market.	106 Comment noted; no action required.

Comment	Response
Davis, Cecile 0011_Jean.Public_Ind **From:** jean public [jeanpublic1@gmail.com] **Sent:** Monday, December 05, 2011 8:23 AM **To:** COMMENTS@POINTTHOMSONPROJECTEIS.COM **Subject:** Fwd: public comment on federal register - usace always votes for total desecration of earth for business profits - always - Fwd: army is one of the worst polluters in this nation ---------- Forwarded message ---------- From: **jean public** <jeanpublic1@gmail.com> Date: Sun, Dec 4, 2011 at 3:58 PM Subject: public comment on federal register - usace always votes for total desecration of earth for business profits - always - Fwd: army is one of the worst polluters in this nation To: comments@pointthompsonprojecteis.com, americanvoices@mail.house.gov, info@emagazine.com, COMMENTS@whitehouse.gov, speakerboehner@mail.house.gov, SF.NANCY@mail.house.gov, humanelines@hsus.org, info@idausa.org, info@theteaparty.org Cc: info@peta.org, info@godscreaturesministry.org, info@earthjutice.org, info@defenders.org, info@seashepherd.org, info@wec.greenpeace.org, info@pewtrust.org, info@oceana.org, broads@greatoldbroads.org General Opposition to Project 107 the usace is a terribly environmental despoiler. they always vote f big business and profiteers. they always vote against the environment. this agency is ruled y big business and MONEY and GREED. we need t put a break on this plan. the plan stinks to high heaven. it allows, exxon, which still havent paid the taxpayers back for destroying prince william sound 30 years ago, to go out and pollute some more. excon cannot be trusted. jeanpublic1@gmail.com [Federal Register Volume 76, Number 221 (Wednesday, November 16, 2011)] [Notices] [Pages 70979-70980] From the Federal Register Online via the Government Printing Office [www.gpo.gov] [FR Doc No: 2011-29632] [[Page 70979]] --- DEPARTMENT OF DEFENSE Department of the Army, U.S. Army Corps of Engineers Notice of Availability of the Draft Environmental Impact Statement for the Proposed Point Thomson Project, North Slope Borough, AK AGENCY: Corps of Engineers, Department of the Army, Department of Defense. 1	107 Comment noted; no action required.

Comment	Response
ACTION: Notice of Availability. --- SUMMARY: In accordance with the National Environmental Policy Act (NEPA), the U.S. Army Corps of Engineers, Alaska District, has prepared a Draft Environmental Impact Statement (EIS) on the proposed development by the Exxon Mobil Corporation and PTE Pipeline LLC (Applicant). The Draft EIS evaluates project alternatives and potential impacts to the environment which may occur from the Applicant's proposal to construct industrial infrastructure and produce liquid hydrocarbon resources near Point Thomson, Alaska. The proposed project includes the construction of structures in navigable waters of the United States (U.S.) and the discharge of dredged and/or fill materials into waters of the U.S., including wetlands. The proposed work requires authorization from the Corps of Engineers under Section 10 of the Rivers and Harbors Act (RHA) of 1899 and Section 404 of the Clean Water Act (CWA). The Draft EIS will be used to evaluate the Applicant's Department of the Army permit application and compliance with NEPA. Draft EIS Availability: Electronically available for viewing, copying, or printing at: http://www.pointthomsonprojecteis.com. A printed Executive Summary, which includes 2 Compact Discs containing the entire Draft EIS, can be obtained electronically through the project Web site address immediately above. Draft EIS Comment Period: The 45-day review and comment period begins on November 18, 2011 and ends on January 3, 2012. Send written comments, postmarked by January 3, 2012, to: Harry A. Baij Jr., U.S. Army Corps of Engineers, Alaska District, Regulatory Division, Post Office Box 6898, JBER, AK 99506-0898. Send electronic comments, received by January 3, 2012, to: comments@pointthomsonprojecteis.com. FOR FURTHER INFORMATION CONTACT: Contact Mr. Baij by email message at harry.a.baij@usace.army.mil, by telephone at (800) 478-2712 (toll free within AK), (907) 753-2784 (office), or (907) 350-5097 (cell). SUPPLEMENTARY INFORMATION: The Corps of Engineers, Alaska District, has published a Public Notice of Application for Permit for the Applicant's proposal to coincide with this Notice of Availability. The Public Notice can be viewed at http://www.poa.usace.army.mil/reg. Navigate to the ``Public Notice'' button and file number POA-2001-1082-M1, Beaufort Sea. Comments on the Public Notice can be submitted by clicking on the Submit Comments button at the Public Notice Web page. The comment period is identical to the Draft EIS comment period. 1. Authorities: Section 404 of the Clean Water Act (33 U.S.C. 1344) and Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. 403). 2. Background Information: The Corps of Engineers, Alaska District, received the Applicant's complete permit application on November 1, 2011. The Applicant's purpose is to produce liquid hydrocarbons and delineate and evaluate hydrocarbon resources in the Point Thomson area. Two natural gas production wells have been previously authorized, drilled, and tested at an existing gravel pad at Point Thomson, AK. Other previously authorized gravel pads and exploration wells also exist in the general area. 3. Location: Alaska's Arctic Coastal Plain, Beaufort seacoast, approximately 60 miles east Prudhoe Bay. Most of the reservoir is located under the Beaufort Sea in State of Alaska waters. The proposed facilities would be located primarily onshore, on State of Alaska lands, leased to the Applicant. Kaktovik, AK is located approximately 60 miles east. The Arctic National Wildlife Refuge is approximately 2 miles east. 2	Comment letter 011 continued.

Comment	Response
4. Proposed Project: Industrial development involving gravel fill placement in tundra waters and wetlands and marine structures. Construct a large gravel mine; a mile-long gravel airstrip; 3 production and/or processing gravel pads; several miles of in-field gravel roads; similar length in-field above-ground pipelines; a marine bulkhead, service pier, and mooring dolphins; navigational dredging; and other industrial infrastructure. Processed liquid hydrocarbons would be transported through a new 22-mile long elevated pipeline to existing facilities to the west and further connections to the Trans Alaska Pipeline System. Construct temporary and permanent camps (lodging); offices, warehouses, and shops; electric power generation and distribution facilities; fuel, water, and chemical storage; a water and wastewater treatment facility; a grind and inject drilling waste facility; a solid waste facility; and communications facilities. Directionally drill a minimum of five wells on three gravel pads: Central, East, and West. The Central Pad would be the largest and the primary location for construction and operations, processing fluids, locating a gas injection well for recycling natural gas, and a wastewater disposal well. The East and West Pads would include wells to delineate and evaluate the hydrocarbon reservoir for additional oil and gas resources and facilitate production. 5. Draft EIS Alternatives: Four alternatives were developed and evaluated in the Draft EIS that would meet the Applicant's purpose and need. The No Action Alternative is used for comparison of the environmental effects of the action alternatives and involves long term monitoring and maintenance of the existing wells and gravel pads. Three Action Alternatives were developed. Two action alternatives would minimize impacts to coastal resources by locating infrastructure components inland from the coastline and reducing coastal access. These 2 alternatives consider alternative transportation routes, such as ice roads and an all-season gravel road in-lieu of barge access. A third alternative was developed to reduce impacts to waters and wetlands by minimizing the total gravel fill footprint. A complete description of the alternatives development, screening process, and the alternatives carried forward for detailed study, is disclosed in Section 2 of the Draft EIS. 6. Scoping Process: A Notice of Intent to prepare a Draft EIS for the Proposed Point Thomson Project was published on December 4, 2009. The Corps of Engineers conducted public, Tribal, and agency scoping meetings in AK prior to preparing the Draft EIS. Results from the scoping process were summarized a Public Scoping Document and are addressed in the Draft EIS. 7. Public Locations for Draft EIS: The Draft EIS is available for review at the following public libraries and schools: a. Harold Kaveolook School, Kaktovik, AK b. Nuiqsut Trapper School, Nuiqsut, AK c. Tuzzy Consortium Library, Barrow, AK d. Noel Wein Library, Fairbanks, AK e. Z.J. Loussac Library, Anchorage, AK f. Alaska Resources Library and Information Services, Anchorage, AK g. University of Alaska, Anchorage Library, Anchorage, AK [[Page 70980]] 8. Public Meetings: Open house and public comment meetings will be held at the following times and locations: 3	Comment letter 011 continued.

Comment	Response
(see below)	Comment letter 011 continued.

Comment

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05 December 2011....................	Anchorage, AK..........	Open House............	4-6 p.m.
	Loussac Library........	Public Comment........	6:30-8 p.m.
07 December 2011....................	Fairbanks, AK..........	Open House............	4-6 p.m.
	Westmark Hotel.........	Public Comment........	6:30-8 p.m.
12 December 2011....................	Kaktovik, AK...........	Open House............	6-7:30 p.m.
	Marsh Creek Inn........	Public Comment........	8-9 p.m.
13 December 2011....................	Nuiqsut, AK............	Open House............	4-6 p.m.
	Trapper School.........	Public Comment........	6:30-8 p.m.
15 December 2011....................	Barrow, AK.............	Open House............	4-6 p.m.
	Hobson Middle School...	Public Comment........	6:30-8 p.m.

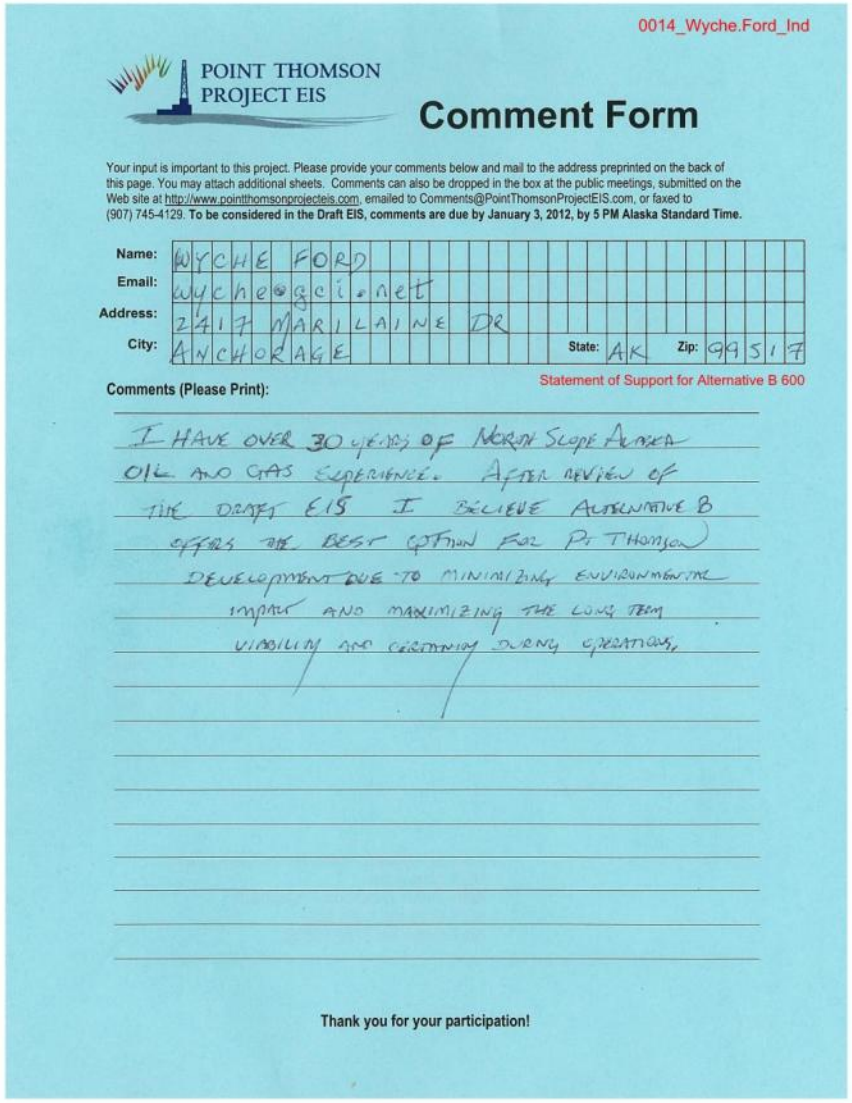
Review and comment of this Draft EIS is encouraged. Requests to be placed on a mailing list for future announcements can be sent to Mr. Baij at the contact information above. The Corps of Engineers will give full consideration to all public comments received on the Draft EIS. A summary of the public meetings, written comment letters, and responses will be incorporated into the Final EIS, as appropriate.

Dated: November 7, 2011.
Harry A. Baij, Jr.,
Project Manager, US Army Corps of Engineers, Alaska District.
[FR Doc. 2011-29632 Filed 11-15-11; 8:45 am]
BILLING CODE 3720-58-P

4

Comment	Response
Davis, Cecile 0012_Joe.Spink_Ind **Sent:** Monday, December 05, 2011 9:26 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Joe Spink Email: joespink@msn.com Contact me through email: Yes Address: 5031 Heritage Heights Drive City: Anchorage State: AK Zip: 99516 Contact Phone: Comments: The proposed project is important to the state of Alaska and to Alaskans. Statement of Support for Alternative B 109 Of the design alternatives considered, Alternative B provides the safest, most environmentally-responsible solution for developing Point Thomson's resources. Alternative B ensures a minimal environmental footprint by incorporating a combination of summer coastal barging, winter ice roads, aviation, and in-field roads. These features are essential to the project's safe and efficient operations. The Point Thomson project will provide wide-ranging benefits to Alaska in the form of new business opportunities, jobs, and revenues. Approval of the Point Thomson project, as proposed in Alternative B, is vital to the development of this world-class resource and North Slope gas commercialization. Direct benefits to the State of Alaska from Point Thomson include training and jobs for Alaskans, new revenues to the state and local governments, increased throughput for the Trans-Alaska oil pipeline, and increased business activity and revenue for the private sector. Point Thomson is a highly-technical project with high costs. Unnecessary requirements that provide very little, if any, incremental environmental benefits, should be avoided as to not compromise the economic viability of the project. 1	109 Comment noted; no action required.

Comment	Response
Davis, Cecile 0013_Kim.Skipper_Ind **From:** Alcantra, Rosetta M. **Sent:** Sunday, December 11, 2011 12:16 PM **To:** Davis, Cecile; Adair, Tina **Subject:** 120511 Kim Skipper PT Comment Please log and update mailing list. Rosetta **From:** Baij, Harry A Jr POA [mailto:Harry.A.Baij@usace.army.mil] **Sent:** Friday, December 09, 2011 5:51 PM **To:** Kim Skipper **Cc:** Begier, Erin; Alcantra, Rosetta M. **Subject:** RE: Point Thompson Project EIS Hi Kim and thanks much for your comments. They will be given full consideration and included in the administrative record. You may add to them up until Jan. 02, 2012 if you want. *Harry A. Baij Jr.* US Army Corps of Engineers, Alaska harry.a.baij@usace.army.mil Office: 907.753.2784 Cell: 907.350.5097 www.poa.usace.army.mil/reg **From:** Kim Skipper [mailto:kimskipper@alaska.com] **Sent:** Monday, December 05, 2011 8:53 PM **To:** Baij, Harry A Jr POA **Subject:** Point Thompson Project EIS Dear Mr. Baij, Thank you for giving me an opportunity to testify on this important project for Alaska. Statement of Support for Alternative B 112 I support Exxon Mobil's Point Thomson natural gas condensate development project and in particular Alternative B - coastal pads with in-field gravel roads. It is the most environmental and responsible way to proceed – the footprint is minimized. The longer airport runway provides better access especially during times of inclement weather. This project is important for Alaska – new business, more jobs and revenue to the State of Alaska. 1	112 Comment noted; no action required.

Comment	Response
	600 Comment noted; no action required.

0014_Wyche.Ford_Ind

POINT THOMSON PROJECT EIS

Comment Form

Your input is important to this project. Please provide your comments below and mail to the address preprinted on the back of this page. You may attach additional sheets. Comments can also be dropped in the box at the public meetings, submitted on the Web site at http://www.pointthomsonprojecteis.com, emailed to Comments@PointThomsonProjectEIS.com, or faxed to (907) 745-4129. **To be considered in the Draft EIS, comments are due by January 3, 2012, by 5 PM Alaska Standard Time.**

Name: WYCHE FORD
Email: wychefgci.net
Address: 2417 MARILAINE DR
City: ANCHORAGE State: AK Zip: 99517

Comments (Please Print): Statement of Support for Alternative B 600

I HAVE OVER 30 YEARS OF NORTH SLOPE ALASKA OIL AND GAS EXPERIENCE. AFTER REVIEW OF THE DRAFT EIS I BELIEVE ALTERNATIVE B OFFERS THE BEST OPTION FOR PT THOMSON DEVELOPMENT DUE TO MINIMIZING ENVIRONMENTAL IMPACT AND MAXIMIZING THE LONG TERM VIABILITY AND CERTAINTY DURING OPERATIONS.

Thank you for your participation!

Comment	Response
Davis, Cecile 0015_Annette.Stibinski_Ind **Sent:** Tuesday, December 06, 2011 1:43 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: annette skibinski Email: askibinski@carlile.biz Address: 3401 Perenosa Bay City: Anch State: AK Zip: 99515 Contact Phone: Comments: I support Point Thomson project and specifically Alternative B. I know that Oil and Gas is developed responsibly and will be done so in the future. Alternative B has the least amount of impact ont he environment. The time is NOW to keep our economy flowing. It is crucial to our state and our nation. The residual amount of work - direct and nondirect are complelty unmeasurable, but I can guarantee it is beyond what we can estimate. We need jobs now and we need less dependency on foreign imports ... every step and opportunity counts. Thank you for advancing Alternative B. Statement of Support for Alternative B 113	113 Comment noted; no action required.
Davis, Cecile 0016_Charles.Hardman_Ind **Sent:** Tuesday, December 06, 2011 3:43 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Charles Hardman Email: chardman@carlile.biz Address: 341 Ocean Point Dr. City: Anchorage State: AK Zip: 99515 Contact Phone: Comments: I Support Point Thompson, Alternative B Statement of Support for Alternative B 115	115 Comment noted; no action required.
Davis, Cecile 0017_Christen.VanTreek-Dwiggins_Ind **Sent:** Tuesday, December 06, 2011 3:12 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Christen Van Treeck-Dwiggins Email: cvantreeck@carlile.biz Address: 1800 E 1st Avenue City: Anchorage State: AK Zip: 99501 Contact Phone: Comments: I support Point Thomason Alternative B Statement of Support for Alternative B 116	116 Comment noted; no action required.

Comment	Response
Davis, Cecile 0018_David.Truitt_Ind **Sent:** Tuesday, December 06, 2011 3:59 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: DAVID TRUITT Email: EDES@GCI.NET Address: 610 CEDAR PARK CIR City: ANCHORAGE State: AK Zip: 99515 Contact Phone: Comments: "I support Point Thomson, Alternative B" Statement of Support for Alternative B 117	117 Comment noted; no action required.
Davis, Cecile 0019_Diane.Lowe_Ind **Sent:** Tuesday, December 06, 2011 3:15 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Diane Lowe Email: dlowe@carlile.biz Contact me through email: Yes Address: 1800 E. 1st Ave City: Anchorage State: AK Zip: 99501 Contact Phone: 907-276-7797 Comments: I support Alternative B Statement of Support for Alternative B 118	118 Comment noted; no action required.
Davis, Cecile 0020_Donna.Riordan_Ind **Sent:** Tuesday, December 06, 2011 9:00 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: DONNA RIORDAN Email: driordan@carlile.biz Contact me through email: Yes Address: 1308 KARLUK ST APT 3 City: ANCHORAGE State: AK Zip: 99501 Contact Phone: 907-229-4097 Add me to mailing list: Yes EIS General 120 Comments: I DO NOT KNOW ENOUGH ABOUT ALL ASPECTS OF THIS PROJECT TO MAKE AN INFORMED OPINION. I REALIZE HOW BENEFICIAL IT WILL BE. I DO NOT QUITE GRASP THE HARM TO THE ENVIRONMENT AS OF YET. I AM A FENCE SITTER AT THIS TIME ABOUT THIS PROJECT. I RESERVE JUDGEMENT.	120 Comment noted; no action required.

Comment	Response
Davis, Cecile 0021_Eric.Stephenson_Ind **Sent:** Tuesday, December 06, 2011 3:10 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: ERIC STEPHENSON Email: akbear1981@yahoo.com Contact me through email: Yes Address: 2231 daybreak ct City: anchorage State: AK Zip: 99501 Contact Phone: 907-750-2850 Comments: I support Point Thomson, Alternative B Statement of Support for Alternative B 601	601 Comment noted; no action required.
Davis, Cecile 0022_Eugene.ONeal_Ind **Sent:** Tuesday, December 06, 2011 3:24 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: EUGENE O'NEAL Email: eugene@gci.net Contact me through email: Yes Address: 12110 PORTAGE ST City: ANCHORAGE State: AK Zip: 99515 Contact Phone: 907-344-9445 Add me to mailing list: Yes Statement of Support for Project 215 Comments: As a lifelong Alaskan, I am in favor of the Point Thompson development project. It is time for Alaskans to take a stand for jobs for our future generations. The enviromental choke hold on our state has to end. We built this state without their help and were good stewarts of the land as well. Let's take back our future and move this project forward! We can do it and and respect the land and resources like those of us did back in the 50's.	215 Comment noted; no action required.
Davis, Cecile 0023_Janette.Miranda_Ind **Sent:** Tuesday, December 06, 2011 3:11 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Janette Miranda Email: jmiranda@carlile.biz Contact me through email: Yes Address: 6941 weimer rd #3 City: anchorage State: AK Zip: 99502 Contact Phone: 907-727-5935 Add me to mailing list: Yes Comments: I support Point Thomson, Alternative B Statement of Support for Alternative B 216	216 Comment noted; no action required.

Comment	**Response**
Davis, Cecile 0024_Jay.Baldwin_Ind **Sent:** Tuesday, December 06, 2011 3:29 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Jay Baldwin Email: jbaldwin@carlile.biz Contact me through email: Yes Address: PO Box 81914 City: Fairbanks State: AK Zip: 99708 Contact Phone: 907-347-7780 Add me to mailing list: Yes Comments: I support Point Thomson Alternative B Statement of Support for Alternative B 217	217 Comment noted; no action required.
Davis, Cecile 0025_Jeremy.Miller_Ind **Sent:** Tuesday, December 06, 2011 3:35 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Jeremy Miller Email: jmiller@carlile.biz Address: 3520 Spinnaker Dr City: Anchorage State: AK Zip: 99516 Contact Phone: Statement of Support for Project 218 Comments: As a person who has worked on the North Slope of Alaska for much of the past 15 years I feel it is very important that we move forward with Exploration and development of our natural resources. I feel sorry for people who think they are trying to protect the environment when they truly don't have an understanding of what they are trying to protect. The North Slope is a barren waste land. In the summer you are eaten alive by bugs, the ground cannot be traversed and the fact of the matter is that the wildlife prefer to travel on the roads and pads than trying to maneuver in the tundra. In the winter it is cold, dark and windy. The storms we get on the North Slope are brutal. I have personally experienced wind speeds over 140 mph with temperatures as low as -70 ambient and -135 with the wind chill. This place was made to work and that is it. Go up and spend your two weeks there and come back to Anchorage. Any one who is that concerned about how development will negitively effect us should go spend some time up there, that would change their mind. Thanks!	218 Comment noted; no action required.

Comment	Response
Davis, Cecile 0026_Kisha.Jackson_Ind **Sent:** Tuesday, December 06, 2011 4:44 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Kisha Jackson Email: kjackson@carlile.biz Address: 1800 East 1st Avenue City: Anchorage State: AK Zip: 99501 Contact Phone: 907-632-2435 Comments: I support Point Thompson, Alternative B Statement of Support for Alternative B 219	219 Comment noted; no action required.
Davis, Cecile 0027_Lauren.Flemming_Ind **Sent:** Tuesday, December 06, 2011 5:17 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Lauren Fleming Email: lojean09@hotmail.com Contact me through email: Yes Address: 3202 S Mason Ave apt L304 City: Tacoma State: AK Zip: 98409 Contact Phone: 9076326317 Statement of Support for Project 220 Comments: I just moved from Alaska and heard about this project. I have family who work up in Prudhoe and have shown intrest myself in working there. I fully support the Point thompson project	220 Comment noted; no action required.
Davis, Cecile 0028_Leona.Sprinkle_Ind **Sent:** Tuesday, December 06, 2011 3:27 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: LEONA SPRNKLE Email: LSPRINKLE@CARLILE.BIZ Address: 311 BEULAH CR #3 City: ANCHORAGE State: AK Zip: 99504 Contact Phone: Comments: I SUPPORT POINT THOMPSON, ALTERNATIVE B. Statement of Support for Alternative B 221	221 Comment noted; no action required.

Comment	**Response**
Davis, Cecile 0029_Lisa.Marquiss_Ind **Sent:** Tuesday, December 06, 2011 4:11 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Lisa Marquiss Email: lmarquiss@carlile.biz Address: 2130 North Midtown Drive City: Palmer State: AK Zip: 99645 Contact Phone: 907-745-8370 Statement of Support for Alternative B 222 Comments: The Pt. Thompson Project is important to Alaska families providing jobs and opportunities. I have worked over 20 years in the transportation industry with various oil companies and ExxonMobil stands out in their commitment to protecting our sensitive Ak ecosystem and overall environment. I urge you to consider supporting Exxonmobile in Alternative B	222 Comment noted; no action required.

Comment	Response
Davis, Cecile 0030_Nicole.Mikes_Ind **Sent:** Tuesday, December 06, 2011 3:15 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Nicole Mikes Email: nmikes@carlile.biz Address: 8620 Turf Court City: Anchorage State: AK Zip: 99504 Contact Phone: 9073433239 Statement of Support for Alternative B 223 Comments: I support Point Thomson, Alternative B. Please continue with all available efforts to limit environmental impact. That said this is an important project for Alaska and based on the information thus far I support it. I wish the food industry was pressured the same regulations and expectations as our developers.	223 Comment noted; no action required.
Davis, Cecile 0031_Paul.Nave_Bus **Sent:** Tuesday, December 06, 2011 3:17 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Paul Nave (Nave Consulting) Email: paul_nave@hotmail.com Contact me through email: Yes Address: 23321 SE 158th ST. City: Issaquah State: WA Zip: 98027 Contact Phone: 2069726871 Statement of Support for Alternative B 224 Comments: I fully recommend and support the ExxonMobil Point Thomson Alternative B proposal.	224 Comment noted; no action required.
Davis, Cecile 0032_Peggy.Spittler_Ind **Sent:** Tuesday, December 06, 2011 2:15 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: peggy spittler Email: part@ak.net Address: 3320 admiralty bay drive City: anchorage State: AK Zip: 99515 Contact Phone: Statement of Support for Alternative B 225 Comments: My husband and I both support that Point Thompson development moves ahead. I would hope every person in America whos longs for our country to be self-sufficient and less dependent on foriegn energy imports would agree. Good for Alaska and our country!	225 Comment noted; no action required.

Comment	Response
Davis, Cecile 0033_Samantha.Savage_Ind **Sent:** Tuesday, December 06, 2011 3:56 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Samantha Savage Email: ssavage@carlile.biz Address: 2231 Daybreak C City: Anchorage State: AK Zip: 99501 Contact Phone: Comments: I support Point Thomson, Alternative B Statement of Support for Alternative B 226	226 Comment noted; no action required.
Davis, Cecile 0034_Tammi.Alexander_Ind **Sent:** Tuesday, December 06, 2011 4:38 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Tammi Alexander Email: talexander@carlile.biz Contact me through email: Yes Address: 7443 Linden Dr. City: Anchorage State: AK Zip: 99502 Contact Phone: 9072297462 Statement of Support for Alternative B 227 Comments: I support Point Thompson, Alternative B. I believe that development of resoruces within Alaska is neccessary for healthy economic growth nationally. Alaska supports a lot of families not only families in Alaska, but those of the people that commute to Alaska for work. Thank you for your attention to this matter.	227 Comment noted; no action required.
Davis, Cecile 0035_Clyde.Carey_Ind **Sent:** Wednesday, December 07, 2011 9:48 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Clyde Carey Email: ccarey@carlile.biz Contact me through email: Yes Address: 1800 E 1st Ave City: Anchorage State: AK Zip: 99501 Contact Phone: 9072767797 Comments: I support Point Thomson, Alternative B Statement of Support for Alternative B 228	228 Comment noted; no action required.

Comment	Response
Davis, Cecile 0036_Dan.Parrish_Ind **Sent:** Wednesday, December 07, 2011 7:29 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Dan Parrish Email: dnpcap4967@aol.com Contact me through email: Yes Address: 106 Maple leaf City: League city State: TX Zip: 77573 Contact Phone: 281-798-5695 Comments: I support the POINT THOMSON project Statement of Support for Project 229	229 Comment noted; no action required.
Davis, Cecile 0037_Darald.Morgan_Ind **Sent:** Wednesday, December 07, 2011 6:54 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Darald Morgan Email: dmorgan@carlile.biz Contact me through email: Yes Address: 6976 knight Dr. S.E. City: Port Orchard State: WA Zip: 98367 Contact Phone: 206-730-1843 Statement of Support for Project 230 Comments: I believe that exploration is vital not only to our economy but our National Defense. We are a strong country because of three things. 1.Natural resources. 2.National Defense. 3.Determination of its people. We must move towards less dependence on foreign energy it is vital to ensure we have what it takes to be able to stand up for countries such as Isreal without the threat of the cutoff of oil from those that oppose all that we stand for.	230 Comment noted; no action required.

Comment	Response
Davis, Cecile 0038_Don.Taylor_Ind **Sent:** Wednesday, December 07, 2011 7:35 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Don Taylor Jr Email: donte8692@comcast.net Contact me through email: Yes Address: 39450 260th Ave SE City: Enumclaw State: WA Zip: 98022 Contact Phone: Statement of Support for Alternative B 231 Comments: • The proposed project is important to the state of Alaska and to Alaskans. • Of the design alternatives considered, Alternative B provides the safest, most environmentally-responsible solution for developing Point Thomson's resources. • Alternative B ensures a minimal environmental footprint by incorporating a combination of summer coastal barging, winter ice roads, aviation, and in-field roads. These features are essential to the project's safe and efficient operations. • Through Alternative B, ExxonMobil will implement comprehensive mitigation measures to minimize impact on tundra, wildlife, aquatic resources, and subsistence activities. • ExxonMobil works closely with the U.S. Fish and Wildlife Service and state agencies to ensure polar bears and other wildlife are fully protected. Coastal barge route is outside the main fall migration corridor of bowhead whales. • The Point Thomson project will provide wide-ranging benefits to Alaska in the form of new business opportunities, jobs, and revenues. • Approval of the Point Thomson project, as proposed in Alternative B, is vital to the development of this world-class resource and North Slope gas commercialization. • Direct benefits to the State of Alaska from Point Thomson include training and jobs for Alaskans, new revenues to the state and local governments, increased throughput for the Trans-Alaska oil pipeline, and increased business activity and revenue for the private sector. • Point Thomson is a highly-technical project with high costs. Unnecessary requirements that provide very little, if any, incremental environmental benefits, should be avoided as to not compromise the economic viability of the project. • The in-field roads included in Alternative B have been carefully routed to minimize the gravel footprint and for the efficient pass through of water. • The longer runway in Alternative B provides better access in bad weather, reduces the number of flights by allowing larger aircraft for routine cargo shipments and allows for aircraft to transport larger equipment capabilities in the event of an emergency.	231 Comment noted; no action required.

Comment	Response
Davis, Cecile 0039_Jared.Norton_Ind **Sent:** Wednesday, December 07, 2011 7:53 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Jared Norton Email: jarednor@gmail.com Address: 3717 n 21st City: tacoma State: WA Zip: 98406 Contact Phone: Comments: I support Point Thomson, Alternative B. Statement of Support for Alternative B 232	232 Comment noted; no action required.
Davis, Cecile 0040_Ken_Ind **Sent:** Wednesday, December 07, 2011 5:26 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: ken Email: ken@baunemail.com Address: 27913 21st ave s City: federal way State: WA Zip: 98003 Contact Phone: 2539466811 Comments: "I support Point Thomson, Alternative B" Statement of Support for Alternative B 233	233 Comment noted; no action required.
Davis, Cecile 0041_Mike.Walls_Ind **Sent:** Wednesday, December 07, 2011 6:30 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Mike Walls Email: mwalls@carlile.biz Address: 22504 92nd Street East City: Buckley State: AK Zip: 98321 Contact Phone: Statement of Support for Project 234 Comments: I support the Point Thomson Alternative project, think of all the jobs that it will create!	234 Comment noted; no action required.

Comment	Response
Davis, Cecile 0042_Theo.McNamara_Ind **Sent:** Wednesday, December 07, 2011 12:57 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Theo McNamara Email: tmcnamara@carlile.biz Address: 438 East 9th Ave #216 City: Anchorage State: AK Zip: 99501 Contact Phone: 907-301-3382 Add me to mailing list: Yes Comments: The proposed project is important to the economic well being of Alaskans and the State's continued growth and its responsiblity to provide this country with a needed resource. Statement of Support for Alternative B 235 Of the design alternatives I've reviewed, I'm convinced that Alternative B provides the safest, most environmentally-responsible solution for developing Point Thomson's resources. Alternative B's combination of summer coastal barging, winter ice roads, aviation, and in-field roads seem to produce much smaller environmental footprint, while ensuring a safe and efficient operation. I believe, through Alternative B, ExxonMobil's comprehensive mitigation measures will minimize impact on tundra, wildlife, aquatic resources, and subsistence activities. I understand that ExxonMobil works closely with the U.S. Fish and Wildlife Service and state agencies to ensure polar bears and other wildlife are fully protected and that their planned barge route is outside the main fall migration corridor of bowhead whales. The Point Thomson project will provide wide-ranging benefits to Alaska in the form of new business opportunities, jobs, and revenues -- and provide all Americans a much more secure and stable economy. Approval of the Point Thomson project, as proposed in Alternative B, is vital to the development of this world-class resource and North Slope gas commercialization. Direct benefits to the State of Alaska from Point Thomson include training and jobs for Alaskans, new revenues to the state and local governments, increased throughput for the Trans-Alaska oil pipeline, and increased business activity and revenue for the private sector. Point Thomson is a highly-technical project with high costs. Unnecessary requirements that provide very little, if any, incremental environmental benefits, should be avoided as to not compromise the economic viability of the project. The longer runway in Alternative B provides better access in bad weather, reduces the number of flights by allowing larger aircraft for routine cargo shipments and allows for aircraft to transport larger equipment capabilities in the event of an emergency. A long runway is a safe runway!! 1	235 Comment noted; no action required.

Comment	Response
Davis, Cecile 0043_William.Ayers_Bus **Sent:** Wednesday, December 07, 2011 5:53 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: William H. Ayers Email: BAyers@carlile.biz Address: 6806 Grouse Hollow City: Centerville State: MN Zip: 55038 Contact Phone: 651-271-1255 Statement of Support for Project 236 Comments: Obviously, oil and gas development are important to the economy of Alaska and the nation. As the Midwest Regional Manager for Carlile Transportation, I have seen first hand how development in one state impacts, favorably, the ecomony of other states. The ongoing Bakken development in North Dakota is very evident in the transportation industry of Minnesota. Trucking companies in this area are adding jobs daily in response to the needs in North Dakota. I believe that development of the resources in Alaska would have a similar impact on jobs in the Midwest. At a time when our nation is desperate for new job creation, it would be foolhardy to ignore the potential that could be realized by developing Point Thompson. Jobs and energy independence are essential for the growth of the country. I urge the Corps to permit this development with all due speed. Thank you, William H. Ayers Midwest Regional Manager Carlile Transportation	236 Comment noted; no action required.
Davis, Cecile 0044_Frances.Bowman_Ind **Sent:** Thursday, December 08, 2011 8:22 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: FRANCES BOWMAN Email: FBOWMAN@CARLILE.BIZ Contact me through email: Yes Address: 7633 SOUTH PARK AVENUE City: TACOMA State: WA Zip: 98408 Contact Phone: Comments: I support the Point Thomson, Alternative B. Statement of Support for Alternative B 237	237 Comment noted; no action required.

Comment	Response
Davis, Cecile 0045_Jerry.Cleworth_LGov **Sent:** Thursday, December 08, 2011 12:38 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Mayor Jerry Cleworth Email: jcleworth@ci.fairbanks,.ak.us Contact me through email: Yes Address: 800 Cushman Street City: Fairbanks State: AK Zip: 99701 Contact Phone: 9074596793 Add me to mailing list: Yes Statement of Support for Alternative B 238 Comments: I would like to lend my support to Alternative B when comparing DEIS alternatives. It is definitely the most workable solution with an extremely minimal impact. I look forward to the development of the Point Thomson Project: one of the few bright hopes for production over the next few years.	238 Comment noted; no action required.
Davis, Cecile 0046_Lin.Milby_Ind **Sent:** Thursday, December 08, 2011 1:19 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Lin Milby Email: lmilby@carlile.biz Contact me through email: Yes Address: 2951 N McRae Drive City: Wasilla State: AK Zip: 99654 Contact Phone: 907-745-4335 Statement of Support for Alternative B 239 Comments: I support Point Thompson Alternative B. I believe this project will provide Alaskans with needed jobs, new business opportunities will help provide revenue to individuals, businesses and the state of Alaska. This project will keep Alaskans working and boost our economy.	239 Comment noted; no action required.
Davis, Cecile 0047_Lukas.Leary_Ind **Sent:** Thursday, December 08, 2011 10:37 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Lukas Leary Email: lukasleary@carlile.biz Address: 11719 birch hills dr City: eagle river State: AK Zip: 99577 Contact Phone: Statement of Support for Alternative B 240 Comments: I support Point Thomson, Alternative B. Natural resources are essential to the continuing success of Alaska's economy	240 Comment noted; no action required.

Comment	Response
Davis, Cecile 0048_Shawna.Vaivai_Ind **Sent:** Thursday, December 08, 2011 8:49 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Shawna Vaivai Email: svaivai@carlile.biz Contact me through email: Yes Address: 938 E. 10th Ave. City: Anchorage State: AK Zip: 99501 Contact Phone: 907-891-0821 Statement of Support for Alternative B 241 Comments: I support Point Thompson, Alternative B to better our economy and jobs needed for the Alaskans.	241 Comment noted; no action required.
Davis, Cecile 0049_Stan.Halvanson_Ind **Sent:** Thursday, December 08, 2011 11:40 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Stan Halvarson Email: halvar@alaska.net Address: 1024 Kellum City: Fairbanks State: AK Zip: 99701 Contact Phone: 9074567802 Not a Comment on EIS 242 Comments: I wish to receive PDF meeting notes on the Point Thompson EIS project	242 The record of public meeting testimony is included in this comment response section of the Final EIS.
Davis, Cecile 0050_Cindy.Hallum_Ind **Sent:** Friday, December 09, 2011 8:34 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Cindy Hallum Email: cindy.hallum@gmail.com Contact me through email: Yes Address: PO Box 870505 City: Wasilla State: AK Zip: 99687-0505 Statement of Support for Alternative B 243 Contact Phone: Comments: My husband and I strongly support Point Thomson, Alternative B. We are Alaskans, so of course we support opening Point Thomson. It is about time. And we believe Alternative B provides the safest solution as well as being environmentally responsible. Thank you for your time. Sincerely, Cindy Hallum	243 Comment noted; no action required.

Comment	Response
Davis, Cecile 0051_Gary.Swoffer_Ind **Sent:** Friday, December 09, 2011 8:22 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Gary Swoffer Email: gswoffer@denali-industrial.com Contact me through email: Yes Address: PO Box 60129 City: Fairbanks State: AK Zip: 99706 Contact Phone: Add me to mailing list: Yes Statement of Support for Project 244 Comments: This project is very important to Alaska and us in the interior. We need jobs and gas. Exxon will to it environmentally right. Do not hold this project up. Thank You	244 Comment noted; no action required.
Davis, Cecile 0052_Kevin.Sibley_Ind **Sent:** Friday, December 09, 2011 8:46 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Kevin Sibley Email: ksibley@carlile.biz Contact me through email: Yes Address: 2301 Taylor Way So City: Tacoma State: WA Zip: 98421 Contact Phone: 206-730-1391 Statement of Support for Alternative B 245 Comments: "I support Point Thomson, Alternative B" It is VITAL for local and Federal job growth.	245 Comment noted; no action required.
Davis, Cecile 0053_Ryan.Williams_Ind **Sent:** Friday, December 09, 2011 7:41 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Ryan Williams Email: rwilliams@carlile.biz Address: 2301 Taylor Way City: Tacoma State: WA Zip: 98421 Contact Phone: Comments: I support Point Thompson, alternative B. Statement of Support for Alternative B 246	246 Comment noted; no action required.

Comment	Response
Davis, Cecile 0054_Jim.Plaquet_Ind **Sent:** Saturday, December 10, 2011 3:32 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Jim Plaquet Email: jandjplaquet@gci.net Address: 1444 2nd Avenue City: Fairbanks State: AK Zip: 99701 Contact Phone: 907 456-4423 Statement of Support for Alternative B 247 Comments: Alternative B is the most environmentally safe way to proceed with the Point Thomson development	247 Comment noted; no action required.
Davis, Cecile 0055_Rada.Khadjinova_Ind **Sent:** Wednesday, December 14, 2011 4:37 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Rada Khadjinova Email: rada@pacriminstitute.com Contact me through email: Yes Address: PO Box 201444 City: Anchorage State: AK Zip: 99520 Contact Phone: 907-727-3828 Statement of Support for Alternative B 248 Comments: I would like to express my support for the Alternative B of the DEIS. I was particularly impressed with the process for alternative consideration, selection, and subsequent environmental review of each practicable alternative. I believe Alternative B represents an optimal choice and good balance between the need to develop Alaska's resources and minimizing impact on surrounding environment. Alaska's economic sustainability primarily depends on responsible development of new hydrocarbon resources. After taking UAA classes in environmental permitting, I have developed more trust in the process and appreciation for project scrutiny and environmental assessment the agency conducts as part of its permitting process.	248 Comment noted; no action required.
Davis, Cecile 0056_Adriany.Vargas_Ind **Sent:** Friday, December 16, 2011 4:11 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Adriany Vargas Email: avargas@carlile.biz Address: 701 s klevin sp 102 City: anchorage State: AK Zip: 99508 Contact Phone: 907-343-3206 Comments: I support Point Thomson, Alternative B Statement of Support for Alternative B 249	249 Comment noted; no action required.

Comment	Response
Davis, Cecile 0057_Amy_Ind **Sent:** Friday, December 16, 2011 2:21 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Amy Email: aharty@carlile.biz Address: 2301 Taylor Way City: tacoma State: WA Zip: 98421 Contact Phone: Comments: I support Point Thomson, Alternative B Statement of Support for Alternative B 250	250 Comment noted; no action required.
Davis, Cecile 0058_Bobbie_Ind **Sent:** Friday, December 16, 2011 10:58 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: bobbiet@charter.net Email: bobbiedale.t@gmail.com Address: PO box 640 City: Guntersville State: AL Zip: 35976 Contact Phone: 2567381258 Statement of Support for Project 251 Comments: Is anybody really doing anything, other than talking and paperwork. Here are jobs waiting to happen, and no one in government is really getting in a hurry for them? Poor working class!	251 Comment noted; no action required.
Davis, Cecile 0059-Bobby.Fontenot_Ind **Sent:** Friday, December 16, 2011 2:21 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Bobby Fontenot Email: fontenot_bobby@yahoo.com Address: PO Box 1673 City: Palmer State: AK Zip: 99645 Contact Phone: Comments: I support Point Thomson, Alternative B Statement of Support for Alternative B 252	252 Comment noted; no action required.

Comment	Response
Davis, Cecile 0060_Brent.Petersen_Ind **Sent:** Friday, December 16, 2011 2:35 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Brent D Petersen Email: bpetersen45@gmail.com Contact me through email: Yes Address: 17434 Meadow Creek Dr City: Eagle River State: AK Zip: 99577 Contact Phone: 907-694-7498 Add me to mailing list: Yes Comments: I support Point Thompson, alternative B Statement of Support for Alternative B 253	253 Comment noted; no action required.
Davis, Cecile 0061_Carl.Trexler_Ind **Sent:** Friday, December 16, 2011 2:22 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: carl trexler Email: ctrexler@carlile.biz Address: 1800 East 1st ave City: anchorage State: AK Zip: 99501 Contact Phone: Add me to mailing list: Yes Statement of Support for Alternative B 254 Comments: I fully suport the development of this project and belive the B option to be in akk our interests.	254 Comment noted; no action required.
Davis, Cecile 0062_Cheryl.Burns_Ind **Sent:** Friday, December 16, 2011 2:57 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Cheryl Burns Email: cburns@alaskalife.net Address: 7307 Bailey Rd City: Anchorage State: AK Zip: 99502 Contact Phone: Comments: "I support Point Thomson, Alternative B" Statement of Support for Alternative B 597	597 Comment noted; no action required.

Comment	Response
Davis, Cecile 0063_Christine_Ind **Sent:** Friday, December 16, 2011 3:16 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: CHRISTINE Email: cmccormick@carlile.biz Address: 2324 RICKERT City: FAIRBANKS State: AK Zip: 99701 Contact Phone: Comments: I SUPPORT THE PROJECT Statement of Support for Project 255	255 Comment noted; no action required.
Davis, Cecile 0064_Connie.Morelos_Ind **Sent:** Friday, December 16, 2011 3:15 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: CONNIE Email: MORELOS Address: 35116 54TH AVE S City: AUBURN State: WA Zip: 98001 Contact Phone: Comments: I support Point Thomson, Alternative B Statement of Support for Alternative B 256	256 Comment noted; no action required.
Davis, Cecile 0065_David.Johnston_Ind **Sent:** Friday, December 16, 2011 5:23 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: David E. Johnston Email: pakrat99709@yahoo.com Address: 1363 Overhill Drive City: Fairbanks State: AK Zip: 99709 Statement of Support for Project 257 Contact Phone: 907-460-4751 Comments: This project will help this country develop energy sources that are not as prone to disturbances in the worl political scene. Natural gas can be used to help reduce our carbon emission footprint since it burns far cleaner than coal or oil.As long as the science is good, developments like this can be completed and operated with a minimum of a long term impact to the Arctic environment.	257 Comment noted; no action required.

Comment	Response
Davis, Cecile 0066_Desiree.Doster_Ind **Sent:** Friday, December 16, 2011 2:19 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Desiree Doster Email: ddoster@carlile.biz Address: 1040 Aspen Street City: Fairbanks State: AK Zip: 99709 Contact Phone: Comments: I support Point Thomson, Alternative B. Statement of Support for Alternative B 258	258 Comment noted; no action required.
Davis, Cecile 0067_Erica.Matich_Ind **Sent:** Friday, December 16, 2011 3:00 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Erica Matich Email: ematich@carlile.biz Contact me through email: Yes Address: 229 Orange Leaf Cir City: Anchorage State: AK Zip: 99504 Contact Phone: 907-632-1368 Comments: I support Point Thomson, Alternative B. Statement of Support for Alternative B 259	259 Comment noted; no action required.
Davis, Cecile 0068_Gary.McConnell_Ind **Sent:** Friday, December 16, 2011 2:23 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Gary Mcconnell Email: gmcconnell@carlile.biz Address: 1040 Aspen Street City: Fairbanks State: AK Zip: 99709 Contact Phone: Comments: I support Point Thomson, Alternative B. Statement in Support for Alternative B 260	260 Comment noted; no action required.

Comment	Response
Davis, Cecile 0069_Harry.McDonald_Ind **Sent:** Friday, December 16, 2011 2:13 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Harry McDonald Email: hmcdonald Contact me through email: Yes Address: 6640 Jollipan Court City: Anchorage State: AK Zip: 99507 Contact Phone: 907-632-2440 Add me to mailing list: Yes Statement in Support for Alternative B 261 Comments: I am the CEO of a locally owned trucking company with 650 employees. Point Thomson is integral to making the future for my own family and the families of my employees positive. Alternative B with the use of Ice roads, barging, air and infield roads will provide the best alternative of jobs and reduced enviromental impact. I have attended a number of Exxon's HSSE full meetings attended by most potential contractors for the project and am assured that the project will be executed in the most safe and professional manner possible. Allowing this project to move forward will benefit all Alaskans and the Country. Thanks	261 Comment noted; no action required.
Davis, Cecile 0070_Jarid.Lane_Ind **Sent:** Friday, December 16, 2011 2:21 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Jerid Lane Email: jlane@carlile.biz Address: 1040 Aspen Street City: Fairbanks State: AK Zip: 99709 Contact Phone: Comments: I support Point Thomson, Alternative B. Statement in Support for Alternative B 262	262 Comment noted; no action required.

Comment	Response
Davis, Cecile 0071_Judy.Chadwick_Ind **Sent:** Friday, December 16, 2011 3:23 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Judy Chadwick Email: catlady59@yahoo.com Contact me through email: Yes Address: 11278 Tulin Park Loop City: Anchorage State: AK Zip: 99516 Contact Phone: 907-522-4155 Statement in Support for Alternative B 263 Comments: The Point Thomson Project is essential to Alaska's future. We must proceed with development projects that are safe and environmentally responsible, and provide the best infrastructure for future developments. Point Thomsons Alternative B provides the infrastructure that is required for future growth, safety and emergency access. Directional Drilling will help to minimize the environmental footprint, while maximizing the output. Alaska needs the new business opportunities, jobs and revenues that this development will bring. I feel that this project has been well thought out and as proposed in Alternative B, is vital to our economic health.	263 Comment noted; no action required.
Davis, Cecile 0072_Kathleen.Graham_IND.PFD **Sent:** Friday, December 16, 2011 3:15 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: KATHLEEN Email: GRAHAM Address: 16944 RIDDELL ST City: EAGLE RIVER State: AK Zip: 99577 Contact Phone: 907-632-2432 Add me to mailing list: Yes Comments: I SUPPORT POINT THOMSON PROJECT Statement in Support for Project 264	264 Comment noted; no action required.
Davis, Cecile 0073_Lane.Keator_Ind **Sent:** Friday, December 16, 2011 2:33 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Lane Keator Email: lkeator@carlile.biz Address: 959 west chena hills drive City: fairbanks State: AK Zip: 99709 Contact Phone: Comments: I support Point Thomson, Alternative B Statement in Support for Alternative B 265	265 Comment noted; no action required.

Comment	Response
Davis, Cecile 0074_Mary.Boston_Ind **From:** Mary Boston [mboston@carlile.biz] **Sent:** Friday, December 16, 2011 4:04 PM **To:** comments@pointthomsonprojecteis.com I support Point Thompson, Alternative B — Statement in Support for Alternative B 266 Also Steve Hollibone supports Point Thompson! He supports Alternative C — Alternatives Comparison 267 Mary Boston| HR Assistant | phone 907-451-7155|fax 907-374-6831 *Carlile* Transportation Systems, Inc. "That's how we do it!" Carlile	266 Comment noted; no action required. 267 Comment noted; no action required.
Davis, Cecile 0075_Matthew.Sievert_Ind **Sent:** Friday, December 16, 2011 2:48 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Matthew Sievert Email: mjhsievert@comcast.net Address: 2301 Taylor Way City: Tacoma State: WA Zip: 98421 Contact Phone: 253-874-2633 — Statement in Support of Alternative B 268 Comments: I support Pt. Thomson, Alternative B. I lived and worked in Alaska for 20 years and my income was derived from the oil and gas industry. I now work in Tacoma and my living is still supported by the oil and gas industry in Alaska. We need oil development in America to reduce our reliance on foreign oil. Please continue to support the development of natural resources in Alaska. Regards, Matthew Sievert	268 Comment noted; no action required.
Davis, Cecile 0076_Megan.Wright_Ind **Sent:** Friday, December 16, 2011 2:23 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Megan Wright Email: megs451@gmail.com Address: 1731 Lore Rd. #2 City: Anchorage State: AK Zip: 99507 Contact Phone: Comments: I support Point Thomson, Alternative B — Statement in Support of Alternative B 269	269 Comment noted; no action required.

Comment	Response
Davis, Cecile 0077_Rose.Odess_Ind **Sent:** Friday, December 16, 2011 3:51 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Rose Odess Email: rodess@carlile.biz Address: 2731 W 72nd City: Anchorage State: AK Zip: 99502 Contact Phone: Comments: I strongly support this project. I believe this project will benefit all Alaskans. Statement in Support of Project 270	270 Comment noted; no action required.
Davis, Cecile 0078_Sherri_Ind **Sent:** Friday, December 16, 2011 4:07 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: sherri Email: kellerpps@yahoo.com Address: 2376 nugget loop City: fairbanks State: AK Zip: 99709 Contact Phone: Comments: I support Point Thomson, Alternative B Statement in Support of Alternative B 271	271 Comment noted; no action required.
Davis, Cecile 0079_Tammy.Roeder_Ind **Sent:** Friday, December 16, 2011 2:23 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Tammy Roeder Email: tlrinak@hotmail.com Contact me through email: Yes Address: 2643 Love Joy Drive City: Anchorage State: AK Zip: 99508 Contact Phone: (907) 244-1086 Comments: I support Point Thomson, Alternative B Statement in Support of Alternative B 272	272 Comment noted; no action required.

Comment	Response
Davis, Cecile 0080_Teresa.Baty_Ind **Sent:** Friday, December 16, 2011 2:29 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Teresa Baty Email: tbaty@carlile.biz Address: 1701 Thuja Avenue City: Anchorage State: AK Zip: 99507 Contact Phone: 907-258-2624 Comments: I support Point Thomson, Alternative B. Statement in Support of Alternative B 273	273 Comment noted; no action required.
Davis, Cecile 0081_Terry.Smith_Ind **Sent:** Friday, December 16, 2011 3:20 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Terry Smith Email: tsmith@carlile.biz Contact me through email: Yes Address: 12800 Cumberland Circle City: Anchorage State: AK Zip: 99516 Contact Phone: 9076326253 Add me to mailing list: Yes Statement in Support of Alternative B 274 Comments: • Alternative B is my preferred option. This critical project and proposed solution provides the safest, most environmentally-responsible solution for developing Point Thomson's resources. It provides the smallest footprint and combines summer coastal barging, winter ice roads, aviation, and in-field roads. Our company contracts on many North Slope projects and our record speaks for itself. We are risk averse and put in place every measures to minimize impact on tundra, wildlife, aquatic resources, and subsistence activities. This project will provide jobs and an economic bridge the State needs as liquids shipped via TAPS continue their decline until another solution is brought in to offset the decline in the near future.	274 Comment noted; no action required.
Davis, Cecile 0082_Tony.Vitoff_Ind **Sent:** Friday, December 16, 2011 2:28 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: tony vitoff Email: vitofft@hotmail.com Address: 3707 n 21st st City: Tacoma State: WA Zip: 98406 Contact Phone: 253-670-6106 Comments: I fully support the Pt Thomson Proj Statement in Support of Project 275	275 Comment noted; no action required.

Comment	Response
Davis, Cecile 0083_Veronica-Bykonen_Ind **Sent:** Friday, December 16, 2011 2:25 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: VERONICA BYKONEN Email: VBYKONEN@YAHOO.COM Address: 28025 150TH PL SE City: KENT State: WA Zip: 98421 Contact Phone: Comments: I SUPPORT POINT THOMSON, ALT B. Statement in Support of Alternative B 276	276 Comment noted; no action required.
Davis, Cecile 0084_Vickie.Wingate_Ind **Sent:** Friday, December 16, 2011 2:24 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Vickie Wingate Email: vkitchen@carlile.biz Address: 434 N. Bragaw #3 City: Anchorage State: AK Zip: 99508 Contact Phone: 907-929-7569 Comments: I support Point Thomson Aleternative B Statement in Support of Alternative B 277	277 Comment noted; no action required.
Davis, Cecile 0085_William.Lanning_Ind **Sent:** Friday, December 16, 2011 8:43 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: William W Lanning Email: billkate@inbox.com Address: 1748 Oversite Court City: Fairbanks State: AK Zip: 99712 Contact Phone: 9074577384 Add me to mailing list: Yes Statement in Support of Alternative B 278 Comments: Please accept alternative B and get this project moving. Alaska and the United States needs this project for the energy and also energy security. Pay attention to the work, monitor the project, hold the players feet to the fire and they will do a very safe project.	278 Comment noted; no action required.

Comment	Response
Davis, Cecile 0086_Curt.Goodwin_Ind **Sent:** Sunday, December 18, 2011 11:22 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Curt Goodwin Email: cgoodwin@carlile.biz Contact me through email: Yes Address: 10507 50th Ave E City: Tacoma State: WA Zip: 98446 Contact Phone: 253-954-6991 Add me to mailing list: Yes Statement of Support for Project 279 Comments: I am in complete support of this project. I have been to Prudhoe Bay numerous times and have always been impressed with the safety procedures in place and how pristine that area is kept. I have no doubt that this area will be maintained in the same high standards. It's time that we start looking towards the preservation of mankind too	279 Comment noted; no action required.
Davis, Cecile 0087_Linda.Leary_Bus **Sent:** Sunday, December 18, 2011 12:31 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Linda Leary Email: lleary@carlile.biz Contact me through email: Yes Address: 11719 birch hills drive City: eagle river State: AK Zip: 99577 Contact Phone: 907-306-3097 Add me to mailing list: Yes Statement in Support of Alternative B 280 Comments: I am writing this letter in support of support Alternative B as the safest, most environmentally-responsible solution for developing Point Thomson's resources in a timely, cost-effective manner. Exxon has shown a committment to Alaska through their enthusiastic support of Alaska hire and use of Alaska contractors on their work on Pt Thompson. They take every precaution to protect employees and contractors and the environment. This project is important to the future of Alaska and the US. Lets get to work and build a bright future for our children and the future of all Alaskans. Linda Leary President Carlile Transportation	280 Comment noted; no action required.

Comment	Response
Davis, Cecile 0088_Ryan.Groth_Ind **Sent:** Sunday, December 18, 2011 7:16 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Ryan Groth Email: aksledhead@gmail.com Address: 3165 Moominvalley City: Fairbanks State: AK Zip: 99709 Contact Phone: Comments: We support Point Thompson, Alternative B. Statement in Support of Alternative B 281	281 Comment noted; no action required.
Davis, Cecile 0089_Cassie.Sheehan_Ind **Sent:** Monday, December 19, 2011 7:00 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: cassie sheehan Email: csheehan@carlile.biz Address: 2301 taylor way City: tacoma State: WA Zip: 98359 Contact Phone: Statement in Support of Alternative B 282 Comments: I support Point Thomson, Alternative B. I work for Carlile Transportation Systems and although I live in Washington State, the development of Point Thomson's resources affects the employees throughout the corporation. Please consider this when making your decisions.	282 Comment noted; no action required.
Davis, Cecile 0090_Jimmy.Goranson_Ind **Sent:** Monday, December 19, 2011 12:17 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Jimmy Goranson Email: Jgoranson@carlile.biz Address: 2429 Forgetmenot lane apt#2 City: Anchorage State: AK Zip: 99508 Contact Phone: Comments: I fully support Point Thompson, (alernative B) Statement in Support of Alternative B 283	283 Comment noted; no action required.

Comment	Response
Davis, Cecile 0091_Mike.Desmond_Ind **Sent:** Monday, December 19, 2011 2:17 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Mike Desmond Email: mike@westmech.com Address: 2225 Van Horn Road City: Fairbanks State: AK Zip: 99701 Contact Phone: Comments: I have reviewed the executive summary for the draft EIS. I do support Alternative B. Statement in Support of Alternative B 284	284 Comment noted; no action required.
Davis, Cecile 0092__Rhonda.Mellinger_Ind **Sent:** Monday, December 19, 2011 6:39 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Rhonda Email: rmellinger@carlile.biz Address: 2301 Taylor Way City: Tacoma State: WA Zip: 98421 Contact Phone: Comments: I support Point Thomson, Alternative B Statement in Support of Alternative B 285	285 Comment noted; no action required.
Davis, Cecile 0093_Steve_Duwa_Ind **Sent:** Monday, December 19, 2011 9:31 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Steve Duwa Email: slduwa@acsalaska.net Address: 3320 E. 42nd Ave City: Anchorage State: AK Zip: 99508 Contact Phone: Comments: I support the development of Point Thompson using the Alternate B plan Statement in Support of Alternative B 286	286 Comment noted; no action required.

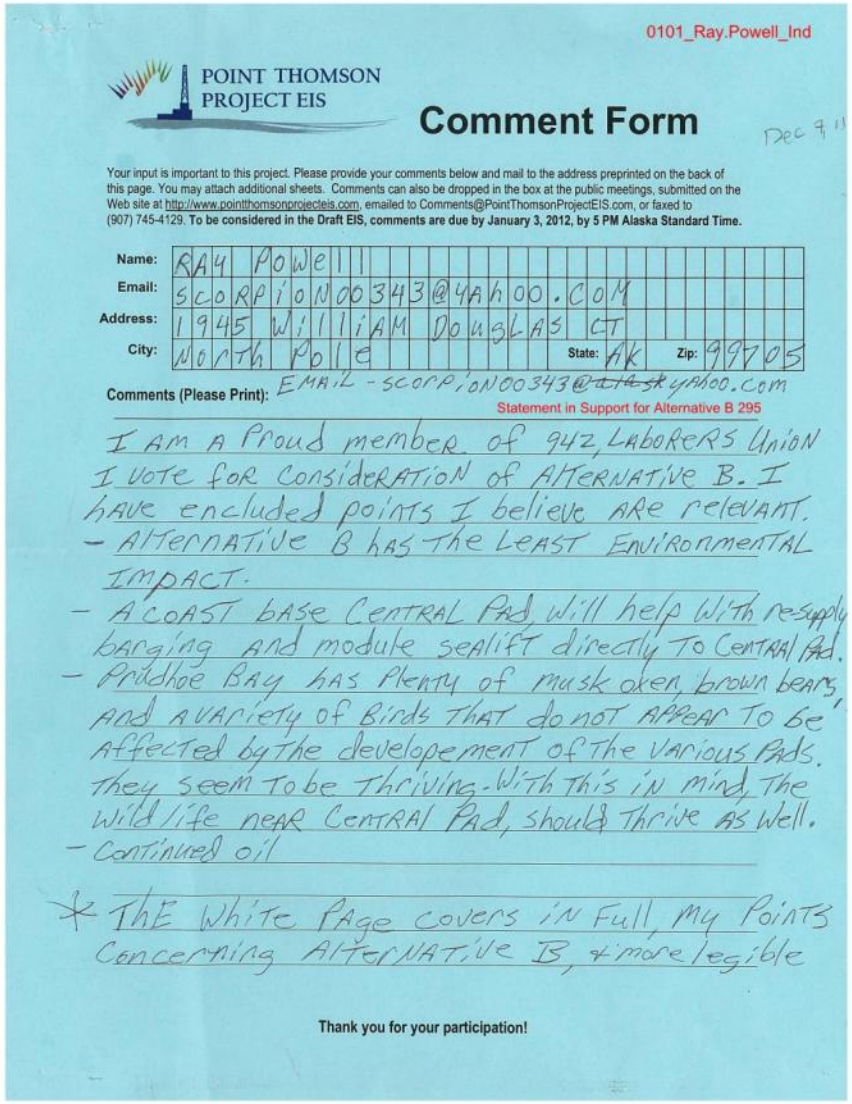
Comment	Response
Davis, Cecile 0094_Jon.Cook_Bus **Sent:** Thursday, December 22, 2011 8:47 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Jon Cook Email: joncook@aer-inc.net Contact me through email: Yes Address: P.O Box 72578 City: Fairbanks State: AK Zip: 99707 Contact Phone: Statement in Support of Alternative B 287 Comments: Airport Equipment Rentals, Inc. fully supports Alternative B with regard to the Pt. Thomson EIS. Our reasons for suppoting this alternative include: • Of the design alternatives considered, Alternative B provides the safest, most environmentally-responsible solution for developing Point Thomson's resources. • Alternative B ensures a minimal environmental footprint by incorporating a combination of summer coastal barging, winter ice roads, aviation, and in-field roads. These features are essential to the project's safe and efficient operations. • Through Alternative B, ExxonMobil will implement comprehensive mitigation measures to minimize impact on tundra, wildlife, aquatic resources, and subsistence activities. • ExxonMobil works closely with the U.S. Fish and Wildlife Service and state agencies to ensure polar bears and other wildlife are fully protected. Coastal barge route is outside the main fall migration corridor of bowhead whales. • The in-field roads included in Alternative B have been carefully routed to minimize the gravel footprint and for the efficient pass through of water. • The longer runway in Alternative B provides better access in bad weather, reduces the number of flights by allowing larger aircraft for routine cargo shipments and allows for aircraft to transport larger equipment capabilities in the event of an emergency. We have worked on nearly every North Slope development project for the last twenty years and Exxon has raised the bar with regard to going above and beyond environmental and safety standards. Finally, while it likely not relevant to USACE in terms of the EIS, Exxon has also gone above and beyond in terms of hiring Alaskan workers and contractors. Regards, 1	287 Comment noted; no action required.

Comment	Response
Davis, Cecile 0095_Derrell.Koontz_Ind **Sent:** Thursday, December 22, 2011 6:10 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Darrell Koontz Email: dkoontz@aksheetmetal.com Contact me through email: Yes Address: 12260 Audubon Drive City: Anchorage State: AK Zip: 99516 Contact Phone: 907-229-5553 Add me to mailing list: Yes Comments: Statement in Support for Alternative B 288 Of the design alternatives considered, Alternative B provides the safest, most environmentally-responsible solution for developing Point Thomson's resources. Alternative B ensures a minimal environmental footprint by incorporating a combination of summer coastal barging, winter ice roads, aviation, and in-field roads. These features are essential to the project's safe and efficient operations. Through Alternative B, ExxonMobil will implement comprehensive mitigation measures to minimize impact on tundra, wildlife, aquatic resources, and subsistence activities. ExxonMobil works closely with the U.S. Fish and Wildlife Service and state agencies to ensure polar bears and other wildlife are fully protected. Coastal barge route is outside the main fall migration corridor of bowhead whales. The in-field roads included in Alternative B have been carefully routed to minimize the gravel footprint and for the efficient pass through of water. The longer runway in Alternative B provides better access in bad weather, reduces the number of flights by allowing larger aircraft for routine cargo shipments and allows for aircraft to transport larger equipment capabilities. Please contact me if you have any question 1	288 Comment noted; no action required.

Comment	Response
Davis, Cecile 0096_Lee.Holmes_Ind **Sent:** Thursday, December 22, 2011 5:07 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Lee Holmes Email: lholmes@gci.net Contact me through email: Yes Address: 1231 Redwood Ct City: Anchorage State: AK Zip: 99508 Contact Phone: 907-278-8211 Statement in Support of Alternative B 289 Comments: I've looked at the various options and believe I would support option B. I've spent considerable time throughout the north slope while working on projects for NSB and I believe use of the barge system is better overall for the slope than building another gravel road. Barges have less impact on our environment than a fleet of semi's continuously rolling over a gravel road. The impact of excavating and moving the gravel along with the long term maintenance of the road would create decades of unnecessary fuel usage, dust in the air, etc. A barge delivery system would have a lot less impact, carbon footprint, etc. than a fleet of diesel trucks. For a similar reason I like option B for the longer runway. when you need to bring something into the remote locations in Alaska, a Herc is going to save you time, money, and carbon footprint again over a fleet of smaller planes having to make multiple trips. Alternatives Comparison 290 I've lived in Alaska for almost 30 years now and feel that the oil and gas industry is doing the best they can and that this is a reasonable approach for the Pt. Thompson Field. Thank you, Lee Holmes 1	289 Comment noted; no action required. 290 Comment noted; no action required.

Comment	Response
Davis, Cecile 0097_Kirk.Jackson_Ind **Sent:** Wednesday, December 21, 2011 8:53 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Kirk Jackson Email: kirk.jackson@ualocal375.org Contact me through email: Yes Address: 3980 Boat Street City: Fairbanks State: AK Zip: 99709 Contact Phone: 907-479-6221 Add me to mailing list: Yes Statement in Support for Alternative B 291 Comments: I strongly support Alternative B for the Point Thompson Project. I support Alternative B for several reasons. 1) The proposed project is important to the State of Alaska and to Alaskans. 2) Alternative B ensures a minimal environmental footprint. The in-field roads included in alternative B have been carefully routed to minimize the gravel footprint and for the efficient pass through of water. 3) It also provides for a longer runway allowing large aircraft for cargo shipments and larger equipment capabilities in the event of an emergency. These are some of the reasons I feel alternative B is the best option.	291 Comment noted; no action required.
Davis, Cecile 0098_Onika.Brown_Ind **Sent:** Wednesday, December 21, 2011 8:36 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Onika Brown Email: obrown@carlile.biz Address: 2301 Taylor Way City: Tacoma State: WA Zip: 98421 Contact Phone: Comments: I support Point Thomson, Alternative B Statement in support for Alternative B 292	292 Comment noted; no action required.
Davis, Cecile 0099_Lance.Roberts_Ind **Sent:** Tuesday, December 20, 2011 12:45 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Lance Roberts Email: Roberts.Lance@gmail.com Contact me through email: Yes Address: PO Box 83449 City: Fairbanks State: AK Zip: 99708 Contact Phone: (907)456-5140 Statement in Support for Alternative B 293 Comments: I support Alternative B for the Point Thomson development.	293 Comment noted; no action required.

Comment	Response
Davis, Cecile 0100_Bill.Cessnun_Ind **Sent:** Thursday, December 22, 2011 10:55 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: bill cessnun Email: cessnun.bill@nrim.com Contact me through email: Yes Address: 9850 Prospect Drive City: Anchorage State: AK Zip: 99507 Contact Phone: 3017163 Comments: I prefer Alternative B. Statement in support for Alternative B 294 • Of the design alternatives considered, Alternative B provides the safest, most environmentally-responsible solution for developing Point Thomson's resources. • Alternative B ensures a minimal environmental footprint by incorporating a combination of summer coastal barging, winter ice roads, aviation, and in-field roads. These features are essential to the project's safe and efficient operations. • Through Alternative B, ExxonMobil will implement comprehensive mitigation measures to minimize impact on tundra, wildlife, aquatic resources, and subsistence activities. • ExxonMobil works closely with the U.S. Fish and Wildlife Service and state agencies to ensure polar bears and other wildlife are fully protected. Coastal barge route is outside the main fall migration corridor of bowhead whales. • The in-field roads included in Alternative B have been carefully routed to minimize the gravel footprint and for the efficient pass through of water. • The longer runway in Alternative B provides better access in bad weather, reduces the number of flights by allowing larger aircraft for routine cargo shipments and allows for aircraft to transport larger equipment capabilities in the event of an emergency. 1	294 Comment noted; no action required.

Comment	Response
	295 Comment noted; no action required.

0101_Ray.Powell_Ind

POINT THOMSON PROJECT EIS

Comment Form

Dec 9 11

Your input is important to this project. Please provide your comments below and mail to the address preprinted on the back of this page. You may attach additional sheets. Comments can also be dropped in the box at the public meetings, submitted on the Web site at http://www.pointthomsonprojecteis.com, emailed to Comments@PointThomsonProjectEIS.com, or faxed to (907) 745-4129. **To be considered in the Draft EIS, comments are due by January 3, 2012, by 5 PM Alaska Standard Time.**

Name: RAY Powell

Email: scorpion00343@yahoo.com

Address: 1945 William Douglas CT

City: North Pole State: AK Zip: 99705

Comments (Please Print): EMAIL - scorpion00343@~~alask~~yahoo.com

Statement in Support for Alternative B 295

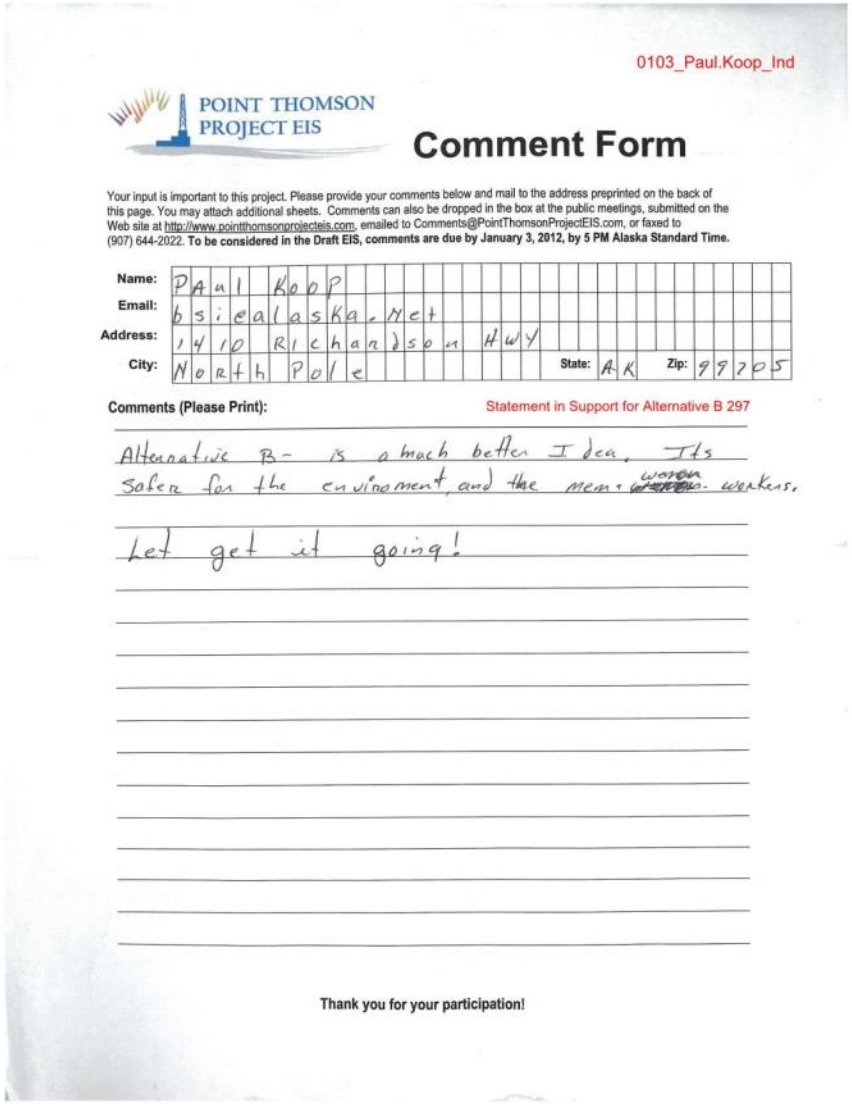
I am a Proud member of 942, Laborers Union I vote for consideration of Alternative B. I have encluded points I believe are relevant.
- Alternative B has the least Environmental Impact.
- A coast base Central Pad, will help with resupply barging and module sealift directly to Central Pad.
- Prudhoe Bay has Plenty of musk oxen, brown bears, and a variety of Birds that do not appear to be affected by the developement of the various Pads. They seem to be Thriving. With this in mind, the wildlife near Central Pad, should Thrive as well.
- Continued oil

* The White Page covers in Full, My Points Concerning Alternative B, & more legible

Thank you for your participation!

Comment	Response
Ray Powell 1945 William Douglas CT North Pole, Alaska 99705 scorpion00343@yahoo.com Cell: 907-378-1029 I am Ray Powell, and a proud member of 942, Laborers Union..I vote for Consideration of Alternative B, I have encluded points I believe are relevant... Alternative B has the least Environmental Impact... A coast based Central Pad, will help with re-supply barging and module sealift directly to Central pad... Prudhoe Bay has plenty of musk oxen, caribou, some brown bears and a variety of birds that do not appear to be affected by the developement of the various pads. They seem to be thriving...with this in mind, the wild life near Central Pad, should thrive as well... Continued oil exploration helps our local businesses, and population, as well as our economy... Oil is used in many products we use all the time. Heating fuel, fuel for our vehicles, and equipment.. Exploring and Developing our natural resources decreases our need for foreign oil.. If we do not manage our natural resources. or replenish them, unemployment will rise... I thank you for considering these points..	Comment letter 0101 continued.

Comment	Response
Davis, Cecile 0102_Vera.Williams_Ind **From:** Alcantra, Rosetta M. **Sent:** Wednesday, December 28, 2011 11:02 AM **To:** Davis, Cecile **Subject:** FW: Point Thomson Project, DEIS and Public Notice comment period extended to January 18, 2012 Cecile, Just wanted to make sure you had this email. Thanks, Rosetta **From:** Vera Williams [mailto:realty@inupiatgov.com] **Sent:** Tuesday, December 27, 2011 9:04 AM **To:** Begier, Erin **Cc:** Baij, Hank; Gallagher, Tim; Alcantra, Rosetta M.; Allwright, Michael C.; Price Leavitt **Subject:** Re: Point Thomson Project, DEIS and Public Notice comment period extended to January 18, 2012 Mitigation 296 I'd like to state for the record via email... as a concern Tribal Member and Citizen of the North Slope -Region: Please consider the "Caribou Crossings", I don't want to think that 7' to 8' height on the proposed pipeline is going to be adequate... my reasoning is that ... "Global Warming" is taking place and the permafrost is melting and .. I've seen the ground go lower even by my own house where the ground has gone down and .. you'll see mounds more and more as our summers are getting hotter and hotter... some of those mounds are graves and some are ice cellars of individual families...and some are lakes that have turned into mounds, also... So as a concern I would plea for "Caribou Crossings" to be constructed .. I would think that would be the most humane thing to do to think ahead and to eliminate possible stress that could be brought out to the very animals we eat as subsistence users... we don't want to see "ill" caribou being corralled and to keep the flow of migration available for the animals we survive on as Inupiat people. Sincerely, Vera Williams. On Fri, Dec 23, 2011 at 11:36 AM, Begier, Erin <Erin.Begier@hdrinc.com> wrote: All, The Corps of Engineers has extended the Point Thomson, Draft Environmental Impact Statement and Public Notice comment period by 15 calendar days to 18 January 2012. Thank you, 1	296 During the 404(b)(1) Guidelines analysis, the Corps will consider mitigation options along with impacts to the environment identified during the NEPA process before making its final permit decision.

Comment	Response
	297 Comment noted; no action required.

0103_Paul.Koop_Ind

POINT THOMSON PROJECT EIS

Comment Form

Your input is important to this project. Please provide your comments below and mail to the address preprinted on the back of this page. You may attach additional sheets. Comments can also be dropped in the box at the public meetings, submitted on the Web site at http://www.pointthomsonprojecteis.com, emailed to Comments@PointThomsonProjectEIS.com, or faxed to (907) 644-2022. **To be considered in the Draft EIS, comments are due by January 3, 2012, by 5 PM Alaska Standard Time.**

Name: Paul Koop
Email: bsiealaska.net
Address: 1410 Richardson HWY
City: North Pole State: AK Zip: 99705

Comments (Please Print): Statement in Support for Alternative B 297

Alternative B- is a much better Idea. Its safer for the environment and the men + ~~women~~ women workers.

Let get it going!

Thank you for your participation!

Comment	Response
Davis, Cecile 0104_Thane.Fisher_Ind **Sent:** Wednesday, December 07, 2011 8:32 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Thane Fisher Email: kah-63@hotmail.com Address: P.O. Box 2076 City: Kenai State: AK Zip: 99611 Contact Phone: 252-9265 Statement in Support for Alternative B 298 Comments: I support Point Thomson, Alternative B. When did developing natural resources become a bad thing? In addition,I believe it is time to build roads and infrastructure to the rest of our state! It can be done responsibly. All Alaskans deserve reasonable access to the resources this state has to offer. Roads would provide this access!	298 Comment noted; no action required.

Comment	Response
0105_Sean.Parnell_SGOV STATE CAPITOL PO Box 110001 Juneau, Alaska 99811-0001 907-465-3500 fax: 907-465-3532 550 West 7th Avenue #1700 Anchorage, Alaska 99501 907-269-7450 fax 907-269-7463 www.Gov.Alaska.Gov Governor@Alaska.Gov Governor Sean Parnell STATE OF ALASKA December 29, 2011 Mr. Harry A. Baij Department of the Army United States Army Corps of Engineers, Alaska District Regulatory Division P.O. Box 6898 Joint Base Elmendorf-Richardson, AK 99506-0898 Re: Point Thomson Draft Environmental Impact Statement (DEIS) Dear Mr. Baij, The State of Alaska will continue promoting American energy independence, energy security, and economic growth by commenting on the Draft Environmental Impact Statement (DEIS) for the Point Thomson project, which was released by the Army Corps of Engineers (Corps) for public comment along with a Public Notice of Application for Permit on November 18, 2011. The State continues to fully support production at Point Thomson, which would help offset current declines in North Slope production and maintain efficiency of the Trans Alaska Pipeline System (TAPS). Over the past 20 years, Alaska North Slope production has steadily declined to its current level of about 640,000 barrels per day. Faced with steadily declining Alaska oil production, a faltering national economy, and energy instability due to our country's reliance on foreign oil, I put forth an ambitious goal for Alaska to increase TAPS throughput to one million barrels of oil production per day within a decade. Bringing Point Thomson development online will certainly move us to increased production, grow economic opportunity, and lessen dependency on foreign sources of energy. Additionally, the field's development is also a likely necessary prerequisite for a natural gas pipeline from the North Slope. For these reasons, the State is keenly interested in ensuring that the Point Thomson leaseholders can move forward to develop this field in a diligent and timely manner. The comments provided on the DEIS are intended to help the Army Corps of Engineers, as the lead federal agency for the DEIS, comply with the National Environmental Policy Act (NEPA) and implementing regulations in 40 CFR Part 1500. The State of Alaska remains a strong proponent of timely decision making and the collaborative working relationship among cooperating agencies for the remainder of the EIS process, as well as the subsequent permitting of the proposed project.	

Comment	Response
Mr. Harry A. Baij December 29, 2011 Page 2 General and page specific comments intended to strengthen the DEIS are enclosed, as well as a letter addressed to Secretary Salazar on the DEIS. Thank you for your consideration of these comments. I look forward to our continued efforts together in providing energy to the nation. Sincerely, Sean Parnell Governor Enclosures cc: The Honorable Daniel Sullivan, Commissioner, Alaska Department of Natural Resources Randy Ruaro, Deputy Chief of Staff, Office of the Governor Kip Knudson, Director of State and Federal Relations, Office of the Governor Jeff Jones, Special Assistant, Office of the Governor Joseph Balash, Deputy Commissioner, Alaska Department of Natural Resources Ed Fogels, Deputy Commissioner, Alaska Department of Natural Resources William Barron, Director, Division of Oil and Gas, Alaska Department of Natural Resources Thomas Crafford, Director, Office of Project Management and Permitting, Alaska Department of Natural Resources Sara Longan, Large Project Manager, Office of Project Management and Permitting, Alaska Department of Natural Resources	

Comment	Response
Enclosure: State of Alaska Comments on the Point Thomson Draft Environmental Impact Statement (DEIS) **Page 2-27, Section 2.4.2.4 Common: Other Infrastructure:** Fugitive dust from gravel mining and gravel storage is not addressed in the DEIS air quality sections. It is not clear to what extent fugitive dust will be generated during mining or generated from gravel storage piles. What, if any, mitigations measures are being considered in the project design to address these problems? Air Quality 299 **Page 3-32, Section 3.4.3, Air Quality Standards, Table 3.4-1:** Footnote g needs to be updated. The Alaska Ambient Air Quality standards now have a 1 hour SO_2 standards in place. Air Quality 300 **Page 3-33, Section 3.4.5, Ambient Air Quality**: The data for Badami is over ten years old. Please describe briefly the value this data adds to the analysis. Air Quality 405 **Section 3.6, Figure 3.6-1, Surface Water Hydrology.** The Liberty Mine Site next to the Duck Island Mine Site is not depicted on the figure. The pipeline bridge is downstream of the vehicle bridge over the West Channel Sagavanirktok River. Hydrology 301 **Section 3.6 Hydrology and Section 3.6.4.7 Lakes.** In the first paragraph it says "Prospective users must apply for water use permit with the Alaska Department of Natural resources (ADNR), who sets permit limits for each source but no amount of water or proportion of water is guaranteed to a permitted user." This statement should be clarified. First, all water withdrawal, impoundment, or diversion must be permitted by ADNR. ADNR does set the quantities allowed for use based on hydrology, recharge, fish presence, etc. It should be clarified that an applicant can apply for either a water right or a temporary water use authorization. A water right gives the holder the right to the water as specified on the permit or certificate of appropriation. This amount of water is only allocated to the holder of the water right and is not available for other users. A temporary water use authorization has no rights and may be allocated to other users. Hydrology 302 **Page 3-67, Section 3.7.3.2, Water Discharges:** The top paragraph in this section reads "*The discharge of treated domestic wastewater to surface water requires a discharge permit from ADEC. The type of permit needed depends on whether the discharge occurs in fresh (AKG-57-0000) or marine (AKG-57-1000) waters.*" This sentence is overly general. We would suggest the following: "The type of domestic wastewater discharge permit needed depends on a variety of factors, including, but not limited to: discharge volume, chemistry, and location; receiving water characteristics, including quality and quantity; whether the discharge is to fresh or marine waters, etc. Accordingly, the applicable domestic wastewater APDES discharge permits for the Point Thomson project are AKG-57-0000 and AKG-57-1000." Water Quality 303 **Page 3-171, Section 3.12, last paragraph.** Most freshwater species such as Arctic grayling or round whitefish do not migrate to low salinity estuarine or nearshore waters in summer. These species may occasionally be found in these waters during summer. Fish 304 **Page 3-181, Section 3.12, first paragraph.** The statement that a gravel mine site (Sag Site C) contains 88 times more water than overwintering areas in the Sagavanirktok River (Hemming 1988) refers to that portion of the West Channel Sagavanirktok River at or immediately downstream of the Sagavanirktok River Bridge. Additional overwintering area exists in the Sagavanirktok River, particularly in the East Channel Sagavanirktok River. Fish 305	299 Most gravel mining would occur during the winter period when fugitive dust is less likely due to the frozen condition of soils. The sentence in Section 5.4.4.1, Construction Emissions: "Additionally, small electric power generators, heaters, and other fuel-burning equipment as well as fugitive dust sources would contribute to emissions during construction" has been changed to "Additionally, small electric power generators, heaters, and other fuel-burning equipment as well as fugitive dust sources such as gravel excavation, storage, and placement would contribute to emissions during construction." Section 5.2.7, Mitigative Measures describes the Applicant's Design Measures for dust control during mining activities as follows: "Applying dust control measures to roads, pads, and summer mining activities to protect insulating vegetation, and minimizing dust settlement on vegetation or snow which could increase thermal conductivity and promote earlier spring thaw in affected areas." The following text was added to the first paragraph of Section 5.4.4.1: "The Applicant would apply dust suppression measures to fugitive dust sources." 300 Footnote 'g' in Table 3.4-1 has been revised to reflect that the AAAQS now have a 1 hour SO2 standard. 405 Badami is the location nearest Point Thomson for which monitoring data are available. The air quality monitoring data for Badami are not intended to represent current conditions in the project area, but the data help provide a more complete picture of current and recent conditions. The text in Section 3.4.5, Ambient Air Quality has been modified to include a sentence at the end of the third bullet, stating: "While the Badami data are over 10 years old, these data augment the air quality description for the study area." 301 Figure 3.6-1 has been revised to show the Liberty Mine Site and the correct location of the existing pipeline downstream of the vehicle bridge over the West Channel Sagavanirktok River. 302 Changes have been made to this existing text in Section 3.6.4.7, Lakes: "Prospective users must apply for a water use permit with the ADNR. The ADNR sets permit limits for each source but no amount of water or proportion of water is guaranteed to a permitted user." The new text states: "All water withdrawal, impoundment, or diversion must be permitted by the ADNR. The ADNR sets quantities allowed for use based on such factors as hydrology, recharge, and fish presence. A prospective water user can apply for either a water right or a temporary water use authorization. A water right gives the holder the right to the water as specified on the permit or certificate of appropriation. This amount of water is only allocated to the holder of the water right and is not available for other users. A temporary water use authorization has no rights and may be allocated to other users." 303 The Corps has changed the text in Section 3.7.3.2, Water Discharges, as suggested in the comment.

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	304 Text regarding freshwater species use of estuarine and nearshore waters was clarified in the referenced paragraph and elsewhere in Section 3.12 of the Final EIS to state that some freshwater species use these habitats for migration during early summer when peak discharges from freshwater systems lower the salinity of nearshore habitats. 305 The text in the referenced paragraph was revised as suggested in the Final EIS.

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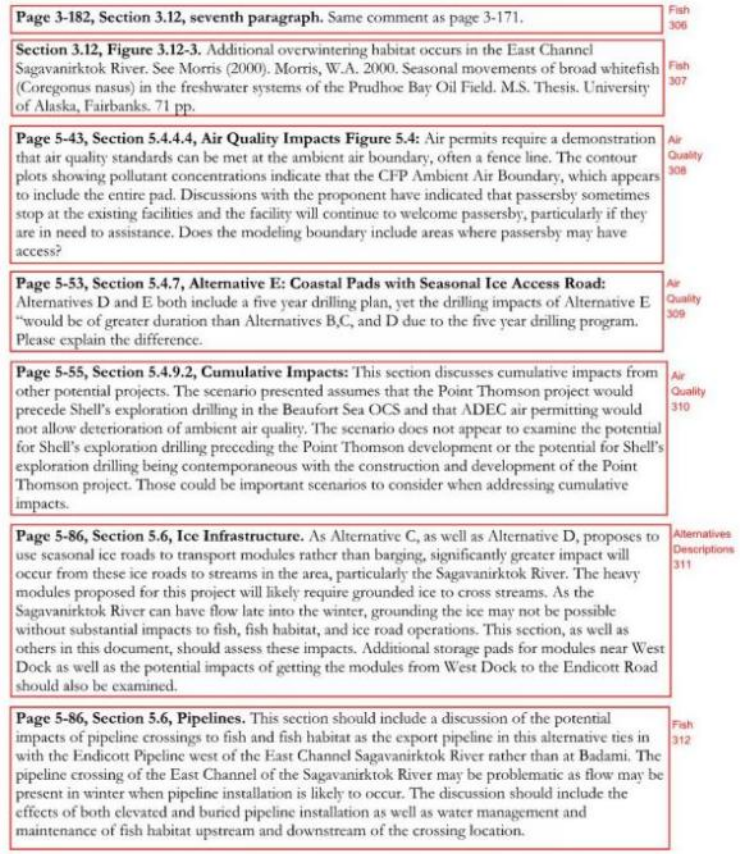	306 Text regarding freshwater species use of estuarine and nearshore waters was clarified in the referenced paragraph and elsewhere in Section 3.12 of the Final EIS to state that some freshwater species use these habitats for migration during early summer when peak discharges from freshwater systems lower the salinity of nearshore habitats. 307 The text in this section and Figure 3.12-3 were revised to include overwintering areas of broad whitefish in the East Channel Sagavanirktok River. Morris (2000) is cited and added to the references chapter. 308 If passersby are welcomed onto the site (within the ambient air boundary), it is presumed they are being allowed to "trespass" at their own risk. Visitors often take tours of industrial plants across the nation, and simply giving them access for a brief site visit does not impact appropriate placement of the dispersion modeling ambient air boundary. Likewise, when regulatory agency staff make a site visit as part of their normal oversight function, their access to areas within the ambient air boundary does not affect the appropriate placement of that boundary. Both visitors and regulators are assumed to accept the risk of being within the ambient air boundary when they are allowed on site. The National Ambient Air Quality Standards (NAAQS) are conservative. Consequently, the potential for any adverse air quality impacts on visitors is negligible given the stringency of the NAAQS. The ambient air boundary does encompasses areas where visitors may briefly be allowed to have access, but any impacts in such areas are not required to be analyzed for modeled demonstrations of compliance with NAAQS. 309 The first sentence of Section 5.4.7, Alternative E: Coastal Pads with Seasonal Ice Access Road: "The construction, drilling, and operations emissions and impacts for Alternative E would be similar to those described in Alternative B (see Table 5.4 2), although drilling impacts would be of greater duration than Alternatives B, C, and D due to the 5-year drilling program" is corrected to state: "The construction, drilling, and operations emissions and impacts for Alternative E would be similar to those described in Alternative B (see Table 5.4 2), although drilling impacts would be spread out longer due to the 5-year drilling program." The first sentence of Section 5.4.5, Alternative C: Inland Pads with Gravel Access Road: "The construction, drilling, and operations emissions and impacts for Alternative C would be similar to those described in Alternative B (see Table 5.4 2), although drilling impacts would be of greater duration due to the 4-year drilling program" is clarified to state, "The construction, drilling, and operations emissions and impacts for Alternative C would be similar to those described in Alternative B (see Table 5.4 2), although drilling emissions would be longer in duration and greater in volume due to the 4-year drilling program and the greater length of the wells."

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	310 A change in the order of implementing other potential projects in the Point Thomson area would not change the conclusions of the alternatives analysis. The facilities would be far enough apart that, because of dispersion, measurable cumulative effects would be unlikely. Further, regardless of the order, the second facility would need to include the first in its air quality modeling and cumulative impact assessment. The Corps believes discussion in the EIS is general enough to account for this scenario without making changes to the original text. 311 The following language has been added to sections 2.4.4.3 Alternative C: Access and Transportation and 2.4.5.3 Alternative D: Access and Transportation to clarify that ice roads would be grounded: "Ice roads would be located such that they could be grounded at stream crossings. For larger streams, such as channels of the Sagavanirktok River, ice road locations would be limited to areas where the streams are shallow and braided." Sections 2.4.4.4 Alternative C: Other Infrastructure and 2.4.5.4 Alternative D: Other Infrastructure of the EIS have the following language: "Module staging pad: Alternative C [D] would require many modules of up to 1,300 tons to complete the CPF. These modules, and any permanent fuel storage tanks, would be sealifted to Prudhoe Bay during the summer open water season but would have to be stored at Deadhorse until the ice road to Point Thomson was installed. The staging area would need to include generators and heaters to prevent the internal instrumentation in the modules from freezing while the modules are staged. Deadhorse does not currently have the storage capacity for that volume of large modules, and a pad would need to be constructed prior to module deliver. The number of modules and subsequent size of the storage pad would be determined during detailed engineering." At this time, engineering of the modules that would be used for Alternative C or D have not been designed. Therefore, the space needed for storage and any potential infrastructure improvements in the Deadhorse area due to the size of the modules is not known. The assumption has been made that through design of the modules infrastructure improvements would be kept to a minimum. During the 404(b)(1) Guidelines analysis, the Corps will consider practicability (which includes cost and logistics), along with the project purpose, public interest determination, and mitigation options when making its final decision. 312 The Corps conducted a review of impacts associated with alternative components and determined that a pipeline extending all the way to Endicott Spur would have higher environmental impacts than a pipeline connecting at Badami and, thus, would not be a likely component of the final project, if the project is permitted. For that reason, this suggested analysis was not conducted.

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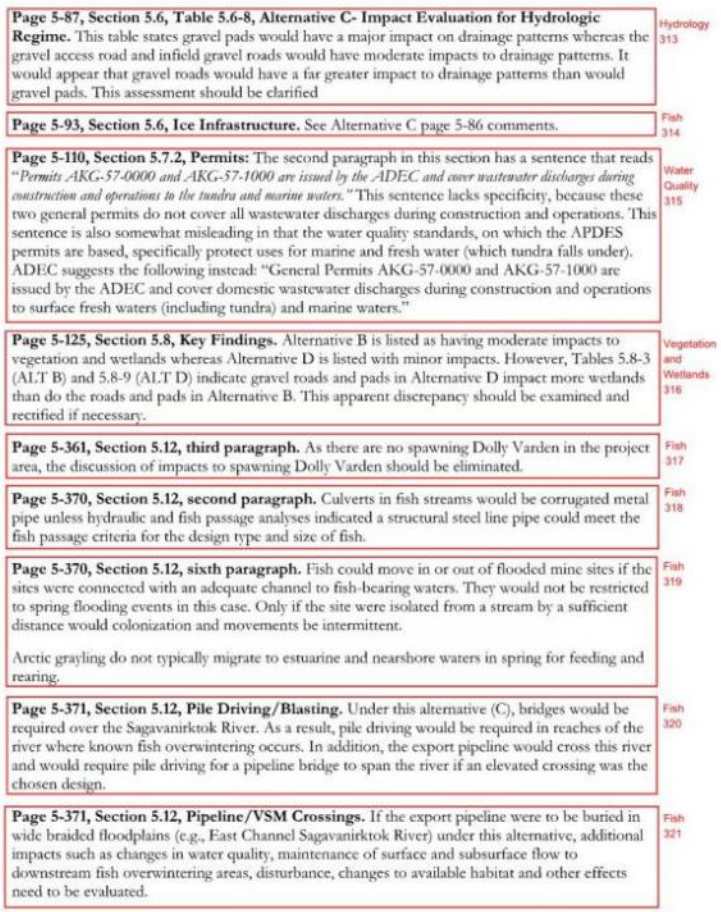	313 The impact determinations are based on the impact criteria. The gravel pads would have a major impact on drainage patterns because there would be no drainage through the pads. The gravel roads would be constructed with culverts and bridges to allow drainage, therefore impacts would be moderate. However, the impacts of the gravel access road in Alternative C would cover a larger area and therefore the geographic extent of the impacts are "extensive" as compared to the "local" extent of impacts from the gravel pads. 314 See response to Comment 312. 315 The text in Section 5.7.2, Permits, has been modified as suggested by ADEC. 316 The impact evaluation defined an impact based on the percentage of a type of wetland/vegetation type, which sometimes did not correspond with the greatest overall amount of wetlands fill or impact. The Key Findings has been revised in the Final EIS to clarify this. 317 The sentences discussing Dolly Varden spawning in Stream 24 were removed from the referenced paragraph in the Final EIS. 318 The referenced paragraph was revised in the Final EIS to clarify that corrugated multiplate culverts would be used for fish bearing streams. 319 The analysis of gravel mine sites for the gravel access road under Alternative C did not assume that channels would be constructed to connect floodplain gravel mine sites to stream channels. The sentence discussing fish movements was revised in the Final EIS to clarify that arctic grayling migrate through drainages while Dolly Varden migrate through nearshore habitats. 320 Text in Section 5.12.4.1, Alternative C: Construction, of the Final EIS was revised to state that documented overwintering areas in the East Channel Sagavanirktok River may be within impact areas for pile driving during bridge construction. 321 The Corps conducted a review of impacts associated with alternative components and determined that a pipeline extending all the way to Endicott Spur would have higher environmental impacts than a pipeline connecting at Badami, and, thus, would not be a likely component of the final project, if the project is permitted. For that reason, this suggested analysis was not conducted.

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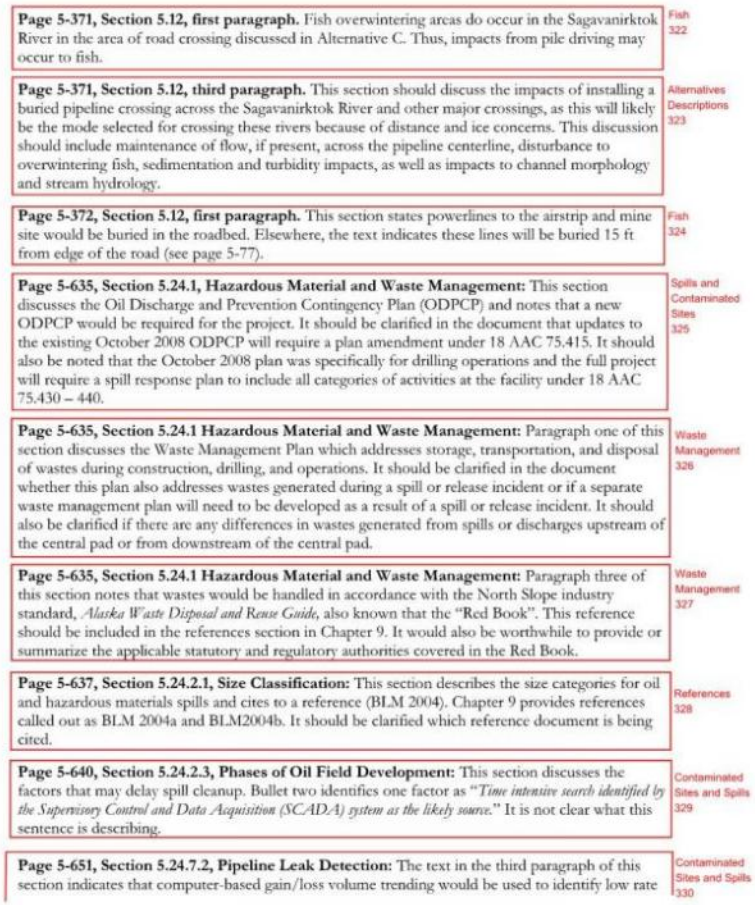	322 The referenced paragraph was revised in the Final EIS to state that pile driving for road bridges may be located within the impact area for overwintering fish. 323 The Corps conducted a review of impacts associated with alternative components and determined that a pipeline extending all the way to Endicott Spur would have higher environmental impacts than a pipeline connecting at Badami, and, thus, would not be a likely component of the final project, if the project is permitted. For that reason, this suggested analysis was not conducted. 324 Placement of the power line varies based on the alternative. Chapter 2 of the Draft EIS (page 2-64) states for Alternative C, "Airstrip and water source power would be distributed from cables buried within the infield gravel road to the airstrip and water source." The text on page 5-77, in Section 5.6, Hydrology, regarding a trenched power line is under the analysis for Alternative B. 325 The Draft EIS text in Section 5.24.1, Hazardous Material and Waste Management, regarding the ODPCP has been modified as follows: "The Applicant prepared an ODPCP prior to drilling the current wells at the PTU-3 pad that covered only drilling activities. This October 2008 plan was approved by the ADEC in March 2009 and is provided in Appendix U. It also provides relevant information for the current assessment of the risk of produced fluid spills for the proposed project. Because this existing ODPCP only addresses drilling operations, a plan amendment would be required under 18 AAC 75.415. The ODPCP for the proposed project would need to include all categories of activities at the facility under 18 AAC 75.430-440." 326 Management of waste associated with spill response would be addressed in the Spill Prevention Control and Countermeasure (SPCC) Plan. The following sentence from the SPCC Plan description in Section 5.24.1: "This plan would contain spill prevention measures such as fluid storage and transfer guidelines, secondary containment requirements, and cleanup procedures if a spill were to occur" has been changed to: "This plan would contain spill prevention measures such as fluid storage and transfer guidelines, secondary containment requirements, and cleanup procedures (including management of associated wastes) if a spill were to occur." The following sentence was added to the end of Section 5.24.2.2, Types of Materials Spilled: "Spills upstream (in a processing context) of the Central Pad Facility could include natural gas condensate, oil, saltwater, and drilling mud, whereas downstream of the facility, spills from the export pipeline could include natural gas liquids and oil." 327 A reference citation has been added to the following sentence in Section 5.24.1, Hazardous Material and Waste Management: "Wastes would be handled in accordance with the North Slope industry standard, Alaska Waste Disposal and Reuse Guide (Red Book) (ARCO and BPXA, 2000), in full compliance with federal, state, and NSB regulatory requirements." The reference has been added to Chapter 9. The following text was added to Section 5.24.1: "The Alaska Waste Disposal and Reuse Guide provides a set of best waste management practices for

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	the majority of routine waste streams generated by oil and gas exploration and production operations in Alaska. The guide contains disposal/reuses tables for various waste streams and products. These tables are based on regulations and policy guidelines of the EPA, ADEC, and AOGCC." 328 The citation in the text has been updated to indicate reference to BLM 2004a. 329 Bullet two under Operation in Section 5.24.2.3, Phases of Oil Field Development, has been changed to "Locating the leak may require significant time searching the area identified by the Supervisory Control and Data Acquisition (SCADA) system as the likely source." 330 The Corps has replaced the following text in Section 5.24.7.2, Pipeline Leak Detection, "The Applicant would also incorporate computer-based accumulated gain/loss volume trending to assist in identifying low rate or seepage releases below the 1.5- to 2-percent-by-volume detection threshold bounded by flow measurement equipment." The new text states, "The Applicant would install two independent leak detection systems. The primary system would detect a leak as small as 1 percent of the daily flow rate, as required by 18 ACC 75.055(a)(3). This system would use meters on the inlet and outlet of the export pipeline, with a state-of-the-art computational system that would perform real-time monitoring for pipeline leaks and be continually updated via the SCADA system. A proprietary leak detection system using different technology would provide another level of protection."

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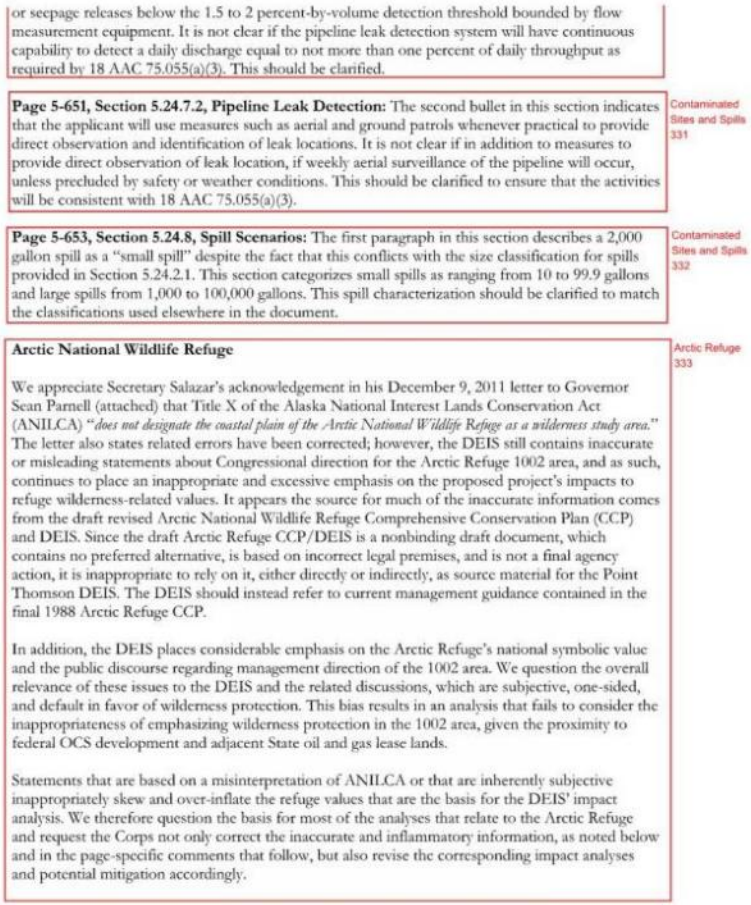 or seepage releases below the 1.5 to 2 percent-by-volume detection threshold bounded by flow measurement equipment. It is not clear if the pipeline leak detection system will have continuous capability to detect a daily discharge equal to not more than one percent of daily throughput as required by 18 AAC 75.055(a)(3). This should be clarified. **Page 5-651, Section 5.24.7.2, Pipeline Leak Detection:** The second bullet in this section indicates that the applicant will use measures such as aerial and ground patrols whenever practical to provide direct observation and identification of leak locations. It is not clear if in addition to measures to provide direct observation of leak location, if weekly aerial surveillance of the pipeline will occur, unless precluded by safety or weather conditions. This should be clarified to ensure that the activities will be consistent with 18 AAC 75.055(a)(3). Contaminated Sites and Spills 331 **Page 5-653, Section 5.24.8, Spill Scenarios:** The first paragraph in this section describes a 2,000 gallon spill as a "small spill" despite the fact that this conflicts with the size classification for spills provided in Section 5.24.2.1. This section categorizes small spills as ranging from 10 to 99.9 gallons and large spills from 1,000 to 100,000 gallons. This spill characterization should be clarified to match the classifications used elsewhere in the document. Contaminated Sites and Spills 332 **Arctic National Wildlife Refuge** We appreciate Secretary Salazar's acknowledgement in his December 9, 2011 letter to Governor Sean Parnell (attached) that Title X of the Alaska National Interest Lands Conservation Act (ANILCA) "*does not designate the coastal plain of the Arctic National Wildlife Refuge as a wilderness study area.*" The letter also states related errors have been corrected; however, the DEIS still contains inaccurate or misleading statements about Congressional direction for the Arctic Refuge 1002 area, and as such, continues to place an inappropriate and excessive emphasis on the proposed project's impacts to refuge wilderness-related values. It appears the source for much of the inaccurate information comes from the draft revised Arctic National Wildlife Refuge Comprehensive Conservation Plan (CCP) and DEIS. Since the draft Arctic Refuge CCP/DEIS is a nonbinding draft document, which contains no preferred alternative, is based on incorrect legal premises, and is not a final agency action, it is inappropriate to rely on it, either directly or indirectly, as source material for the Point Thomson DEIS. The DEIS should instead refer to current management guidance contained in the final 1988 Arctic Refuge CCP. In addition, the DEIS places considerable emphasis on the Arctic Refuge's national symbolic value and the public discourse regarding management direction of the 1002 area. We question the overall relevance of these issues to the DEIS and the related discussions, which are subjective, one-sided, and default in favor of wilderness protection. This bias results in an analysis that fails to consider the inappropriateness of emphasizing wilderness protection in the 1002 area, given the proximity to federal OCS development and adjacent State oil and gas lease lands. Statements that are based on a misinterpretation of ANILCA or that are inherently subjective inappropriately skew and over-inflate the refuge values that are the basis for the DEIS' impact analysis. We therefore question the basis for most of the analyses that relate to the Arctic Refuge and request the Corps not only correct the inaccurate and inflammatory information, as noted below and in the page-specific comments that follow, but also revise the corresponding impact analyses and potential mitigation accordingly. Arctic Refuge 333	331 The following sentence has been added prior to the last sentence in Section 5.24.7.2, Pipeline Leak Detection, "Visual inspections of the export and infield pipelines would be conducted weekly during operations via aerial surveillance, unless precluded by safety or weather conditions." 332 The following sentence in Section 5.24.8, Spill Scenarios: "For example, a small spill of 2,000 gallons into an interconnected tundra wetland system in late spring where thousands of migrating waterfowl are getting ready to nest could cause substantial impacts, whereas a very large spill of 210,000 gallons onto a frozen, snow-covered dry tundra in winter…" has been changed to: "For example, a spill of 2,000 gallons into an interconnected tundra wetland system in late spring where thousands of migrating waterfowl are getting ready to nest could cause substantial impacts, whereas a spill of 210,000 gallons onto frozen, snow-covered dry tundra in winter…" 333 **Errors regarding 'wilderness study area.'** In preliminary drafts, the Draft EIS stated that the 1002 Area was designated by ANILCA as a wilderness study area. As indicated in Secretary Salazar's letter, the Department of Interior has indicated that is not the case. Not all instances of such language were corrected for the DEIS (most notably in Appendix N) but have been corrected for the Final EIS. See also responses to comment 336 regarding use of the word "wilderness." **Inappropriate and excessive emphasis.** As indicated in Secretary Salazar's letter, the 1002 Area does possess wilderness qualities, and disclosure of impacts is the aim of an EIS. Therefore, disclosure of impacts to the refuge (including its wilderness qualities) is appropriate. See also response to Comment 125. **Sources of Refuge information.** Information for the EIS did not come from the draft revised CCP; information came from the existing 1988 plan and Refuge staff. See also Comments 335 and 345 regarding citations that have been added. **National/symbolic values**. The EIS explains the national values of the 1002 Area, both for oil and gas development and for protection of the wild/natural landscape, and describes the Refuge's current management of both the designated unit of the National Wilderness Preservation System and nondesignated lands. Wilderness values, including the Refuge's symbolic value, are relevant because they are the background that explains why development of Point Thomson, within sight of the refuge but on adjoining nonrefuge land, creates an impact. See also response to Comment 356.

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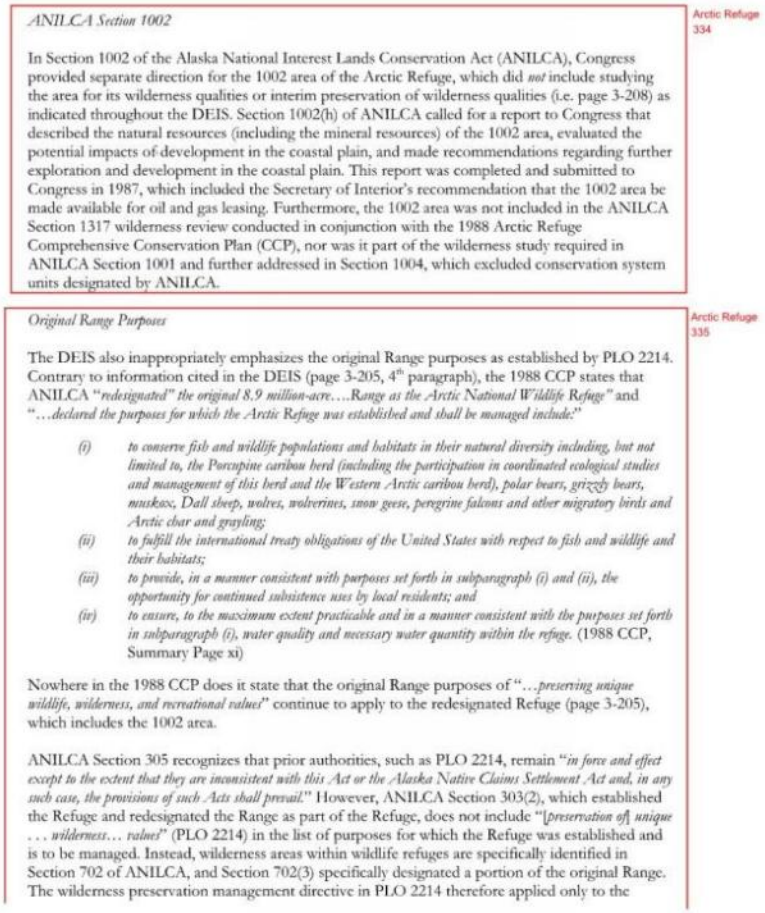 *ANILCA Section 1002* Arctic Refuge 334 In Section 1002 of the Alaska National Interest Lands Conservation Act (ANILCA), Congress provided separate direction for the 1002 area of the Arctic Refuge, which did *not* include studying the area for its wilderness qualities or interim preservation of wilderness qualities (i.e. page 3-208) as indicated throughout the DEIS. Section 1002(h) of ANILCA called for a report to Congress that described the natural resources (including the mineral resources) of the 1002 area, evaluated the potential impacts of development in the coastal plain, and made recommendations regarding further exploration and development in the coastal plain. This report was completed and submitted to Congress in 1987, which included the Secretary of Interior's recommendation that the 1002 area be made available for oil and gas leasing. Furthermore, the 1002 area was not included in the ANILCA Section 1317 wilderness review conducted in conjunction with the 1988 Arctic Refuge Comprehensive Conservation Plan (CCP), nor was it part of the wilderness study required in ANILCA Section 1001 and further addressed in Section 1004, which excluded conservation system units designated by ANILCA. *Original Range Purposes* Arctic Refuge 335 The DEIS also inappropriately emphasizes the original Range purposes as established by PLO 2214. Contrary to information cited in the DEIS (page 3-205, 4th paragraph), the 1988 CCP states that ANILCA "*redesignated" the original 8.9 million-acre….Range as the Arctic National Wildlife Refuge"* and "*…declared the purposes for which the Arctic Refuge was established and shall be managed include:*" *(i) to conserve fish and wildlife populations and habitats in their natural diversity including, but not limited to, the Porcupine caribou herd (including the participation in coordinated ecological studies and management of this herd and the Western Arctic caribou herd), polar bears, grizzly bears, muskox, Dall sheep, wolves, wolverines, snow geese, peregrine falcons and other migratory birds and Arctic char and grayling;* *(ii) to fulfill the international treaty obligations of the United States with respect to fish and wildlife and their habitats;* *(iii) to provide, in a manner consistent with purposes set forth in subparagraph (i) and (ii), the opportunity for continued subsistence uses by local residents; and* *(iv) to ensure, to the maximum extent practicable and in a manner consistent with the purposes set forth in subparagraph (i), water quality and necessary water quantity within the refuge.* (1988 CCP, Summary Page xi) Nowhere in the 1988 CCP does it state that the original Range purposes of "*…preserving unique wildlife, wilderness, and recreational values*" continue to apply to the redesignated Refuge (page 3-205), which includes the 1002 area. ANILCA Section 305 recognizes that prior authorities, such as PLO 2214, remain "*in force and effect except to the extent that they are inconsistent with this Act or the Alaska Native Claims Settlement Act and, in any such case, the provisions of such Acts shall prevail.*" However, ANILCA Section 303(2), which established the Refuge and redesignated the Range as part of the Refuge, does not include "[*preservation of] unique . . . wilderness… values*" (PLO 2214) in the list of purposes for which the Refuge was established and is to be managed. Instead, wilderness areas within wildlife refuges are specifically identified in Section 702 of ANILCA, and Section 702(3) specifically designated a portion of the original Range. The wilderness preservation management directive in PLO 2214 therefore applied only to the	334 The last bullet on page 3-208 (Section 3.14.3) was in error and has been removed. See also response to Comment 333. 335 The Draft EIS reflects how the USFWS actually manages the Arctic Refuge today. Information regarding applicability of the original Range purposes came from Refuge staff. This has been clarified and two staff citations added. The following quote from the 1987 Legislative EIS "The entire 1002 area meets these criteria" (criteria of the Wilderness Act) has been paraphrased and added to the text in the third paragraph of 3.13.5.3 and a citation added. That paragraph now reads: "A 1987 Secretary of the Interior EIS and report to Congress acknowledged that the entire 1002 Area met the criteria of The Wilderness Act, which would qualify it for designation as part of the National Wilderness Preservation System, but recommended authorization of full oil and gas leasing of the 1002 Area because of the importance of the oil and gas resource to the nation (Clough et al., 1987). Although opening the 1002 Area to oil and gas development has been proposed multiple times in both houses of Congress, the issue of development versus preservation has been highly charged among the public, and a final decision that would either open the area to oil and gas drilling or include it in the National Wilderness Preservation System has not been made."

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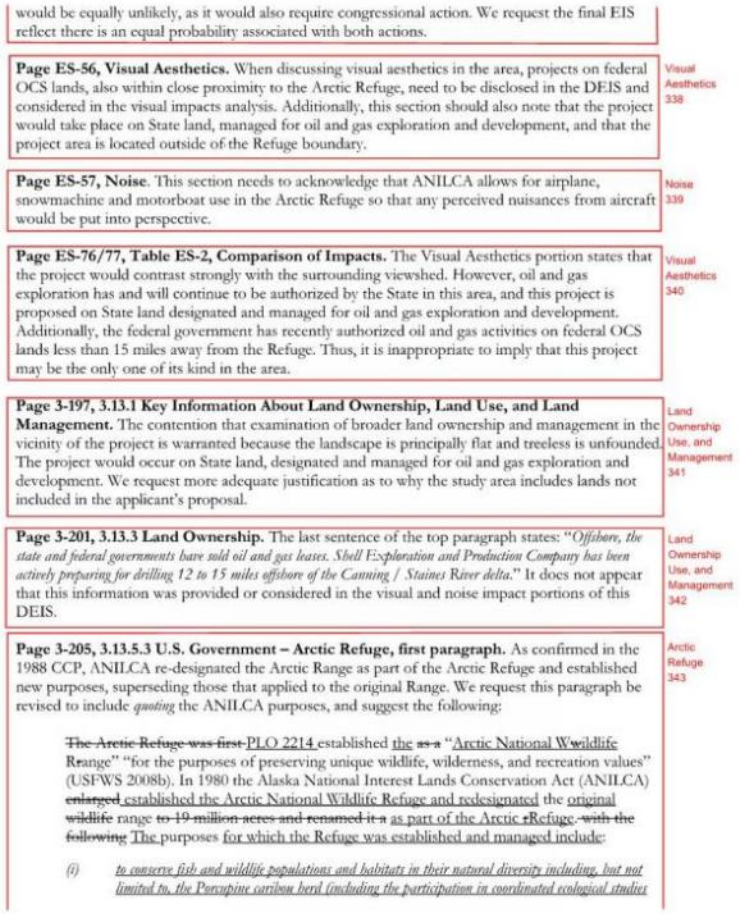
 original Range, and has been superseded by the formal wilderness designation of the original Range in ANILCA section 702(3), which does not include the 1002 area. As such, not only has the wilderness directive in PLO 2214 been superseded by the formal wilderness designation in ANILCA section 702(3), but it cannot be read into the management intent for the rest of the Refuge, which is set forth in ANILCA Section 303(2). In fact, wilderness preservation is pointedly absent from the list of purposes for which the Refuge was established and should not in any way be used as the basis for analyzing project impacts to the Refuge. *Appendix N, Visual Resource Assessment* The Visual Resource Assessment is a prime example of how this misinformation is being inappropriately applied in the DEIS. As stated above, the 1002 area was not included in the ANILCA Section 1001 wilderness study, or the 1988 Section 1317 Arctic Refuge wilderness review, therefore, statements included in the Appendix, such as "*ANILCA indicated that, until Congress determined otherwise, the 1002 Area was to be administered to maintain presently existing wilderness character and potential for inclusion in the National Wilderness Preservation System*" (page 3 and 23) and "*The 1002 Area of the Arctic Refuge is a "minimal management" wilderness study area*" (page 25) are inaccurate, as is applying the term "*de facto wilderness*" to Refuge non-designated wilderness. Only Congress can designate Wilderness and "de facto" wilderness violates that authority. Using BLM manual guidance to designate the 1002 Area as a "Special Area" on that basis for the purposes of this analysis is also inappropriate. As such, the very basis for the "high" sensitivity rating applied to the 1002 area is flawed. The Appendix also includes ample discussion of the scenic values that are located *within* the Refuge for which the Refuge is managed; however, the purpose of the analysis is to determine the visual impacts of the proposed project, which is located *off* refuge lands. The scenic values of the refuge would not be impacted by the proposed project, which is located outside the refuge boundary; therefore, it is unreasonable to expect mitigation for facilities that are merely being viewed by visitors within the Refuge. Given the proposed project is located outside the refuge boundary, adjacent to lands that have similar potential for oil and gas development, and ample refuge lands (approximately 19 million acres) remain available *without* the potential for such visual impacts, the proposed mitigation on page 97, which requires "*creating greater distance between corridors or view points and industrial facilities…*" is unreasonable and must be eliminated from consideration. ANILCA established clear boundaries for conservation system units (CSU) and did not include "buffers" for further protection. Treating surrounding lands as a "buffer" for this CSU is inappropriate, especially considering the management intent for the surrounding lands has been apparent since statehood. We suggest the Refuge instead advise interested visitors that development occurring outside the refuge boundary may be visible during certain conditions and to plan their visit accordingly. The State of Alaska should not be expected to manage its oil and gas lease lands as though they were within a refuge. Visual Aesthetics 336 **Page-Specific Comments: Arctic National Wildlife Refuge** **Page ES-5, Proximity to Arctic Refuge**. The Executive Summary states that opening the 1002 Area to oil and gas development is not considered reasonably foreseeable at this time and is not an issue that will be addressed in this DEIS. However, in many places of this DEIS contrary statements are made. Page specific examples follow. In addition, a wilderness designation in the 1002 area Arctic Refuge 337	336 **Wilderness definition.** To help minimize confusion, the Final EIS has been revised to use "National Wilderness Preservation System" or "Mollie Beattie Wilderness" consistently when referring to formally designated unit of the National Wilderness Preservation System. Where wilderness, as defined in the dictionary, is the subject of discussion, the text has been revised to indicate "wilderness qualities" or to specify "nondesignated wilderness." (See also Comment 359.) References to wilderness study area status were in error and have been removed. **Visual sensitivity rating in Appendix N.** The H-M-L ratings are appropriate, and reference to the 'wilderness study area' has been removed. The focus is on relative public interest in these areas (highest public interest and sensitivity for refuge land, which is a conservation system unit managed in part for its wilderness qualities and natural scenic values; moderate for state land along the coastal corridor and refuge boundary; and low for state lands farther inland). That refuge lands and views by refuge users would be rated as more sensitive than views from state lands is consistent with the common perception in the area and with sentiment expressed in this comment (336) about distinctions between the two areas. **Project not located on refuge lands.** The intent is to determine the visual impacts of the proposed project on viewers as seen from sensitive viewpoints, some of which are within the Refuge. **Mitigation.** Mitigation examples listed at the end of Appendix N are examples, as stated in the text, not proposed mitigation or requirements. Proposed mitigation is provided in the body of the EIS. 337 The Executive Summary has been revised for the Final EIS to indicate that neither opening the 1002 Area to oil and gas exploration and development nor permanently closing it by formal designation as part of the National Wilderness Preservation System is considered a reasonably foreseeable future action.

Comment	Response
	338 OCS development is discussed in the EIS under cumulative impacts as a reasonably foreseeable future action and briefly discussed in the Draft EIS Executive Summary under Key Impacts/Issues. The Executive Summary discussion of visual aesthetics focuses primarily on the coastal corridor, which includes state lands and waters closest to the project. Management for oil and gas development does not preclude the potential for visual impacts that are appropriately analyzed in an EIS. See also responses to Comments 340 and 342. 339 This section of the Executive Summary is a summary of the main findings of the noise impact analysis, which does not discuss ANILCA or permitted uses. Section 3.18.3, Recreation in the Study Area, discusses the permitted activities in the study area and in the Arctic Refuge, including airplane, snowmachine, and boat use. 340 As discussed in the main text of the EIS, if the Point Thomson Project is built, it would be the first effectively permanent oil and gas production facility in the eastern ACP landscape. Any future nearby projects would have incremental, additive impacts but would not create as much visual contrast once the first industrial project is in place and part of the visual environment. Other oil and gas activities are discussed under cumulative impacts. See also responses to Comments 338 and 342. 341 The "flat and treeless" reference is indication that the project may be seen and heard from areas beyond the immediate project site. The sentence has been modified for clarity: "Examination of broader land ownership and management in the vicinity of the project is warranted because there is potential for impacts to a broader area. The landscape is principally flat and entirely treeless, so refuge lands used for recreation and subsistence, and as habitat for wildlife (which move across the refuge boundary), are within the area potentially affected by the project." See also the response to Comment 125. 342 Offshore oil and gas plans, including the Shell Exploration project, are included as reasonably foreseeable future actions in the cumulative impacts section of Chapter 4, and are thus considered in the cumulative impacts sections of the visual (Section 5.19.7) and noise (Section 5.20.10) sections of the EIS. See also responses to Comments 338 and 340. 343 See response under Comment 335. The text has been clarified.

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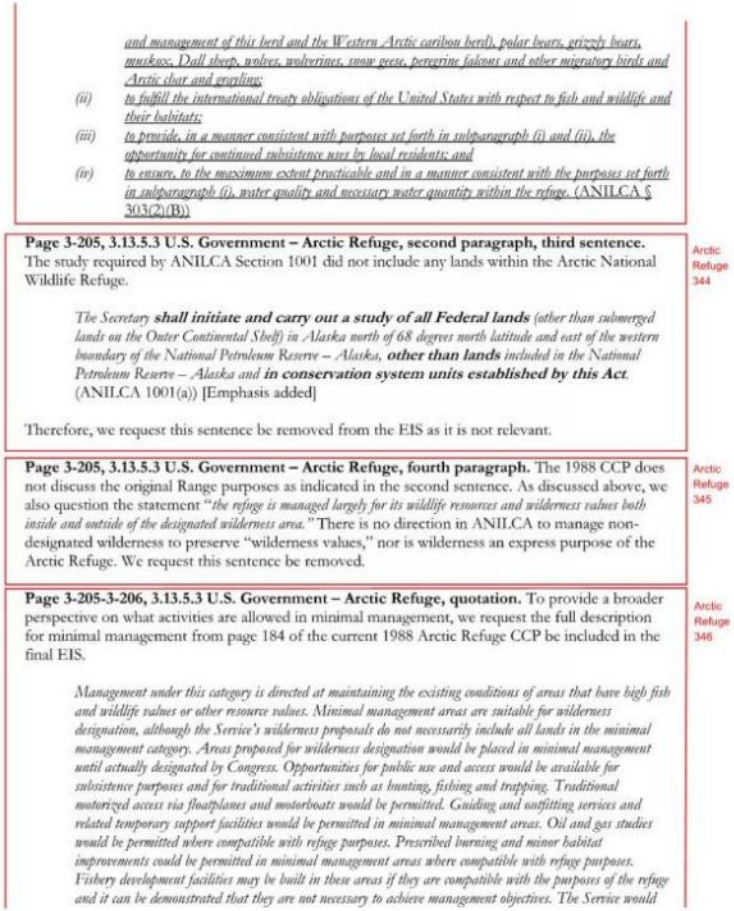 *and management of this herd and the Western Arctic caribou herd), polar bears, grizzly bears, muskox, Dall sheep, wolves, wolverines, snow geese, peregrine falcons and other migratory birds and Arctic char and grayling;* *(ii) to fulfill the international treaty obligations of the United States with respect to fish and wildlife and their habitats;* *(iii) to provide, in a manner consistent with purposes set forth in subparagraph (i) and (ii), the opportunity for continued subsistence uses by local residents; and* *(iv) to ensure, to the maximum extent practicable and in a manner consistent with the purposes set forth in subparagraph (i), water quality and necessary water quantity within the refuge.* (ANILCA § 303(2)(B)) **Page 3-205, 3.13.5.3 U.S. Government – Arctic Refuge, second paragraph, third sentence.** The study required by ANILCA Section 1001 did not include any lands within the Arctic National Wildlife Refuge. *The Secretary* ***shall initiate and carry out a study of all Federal lands*** *(other than submerged lands on the Outer Continental Shelf) in Alaska north of 68 degrees north latitude and east of the western boundary of the National Petroleum Reserve – Alaska,* ***other than lands*** *included in the National Petroleum Reserve – Alaska and* ***in conservation system units established by this Act.*** (ANILCA 1001(a)) [Emphasis added] Therefore, we request this sentence be removed from the EIS as it is not relevant. Arctic Refuge 344 **Page 3-205, 3.13.5.3 U.S. Government – Arctic Refuge, fourth paragraph.** The 1988 CCP does not discuss the original Range purposes as indicated in the second sentence. As discussed above, we also question the statement "*the refuge is managed largely for its wildlife resources and wilderness values both inside and outside of the designated wilderness area.*" There is no direction in ANILCA to manage non-designated wilderness to preserve "wilderness values," nor is wilderness an express purpose of the Arctic Refuge. We request this sentence be removed. Arctic Refuge 345 **Page 3-205-3-206, 3.13.5.3 U.S. Government – Arctic Refuge, quotation.** To provide a broader perspective on what activities are allowed in minimal management, we request the full description for minimal management from page 184 of the current 1988 Arctic Refuge CCP be included in the final EIS. *Management under this category is directed at maintaining the existing conditions of areas that have high fish and wildlife values or other resource values. Minimal management areas are suitable for wilderness designation, although the Service's wilderness proposals do not necessarily include all lands in the minimal management category. Areas proposed for wilderness designation would be placed in minimal management until actually designated by Congress. Opportunities for public use and access would be available for subsistence purposes and for traditional activities such as hunting, fishing and trapping. Traditional motorized access via floatplanes and motorboats would be permitted. Guiding and outfitting services and related temporary support facilities would be permitted in minimal management areas. Oil and gas studies would be permitted where compatible with refuge purposes. Prescribed burning and minor habitat improvements could be permitted in minimal management areas where compatible with refuge purposes. Fishery development facilities may be built in these areas if they are compatible with the purposes of the refuge and it can be demonstrated that they are not necessary to achieve management objectives. The Service would* Arctic Refuge 346	344 The sentence referring to Section 1001 has been removed. 345 Most of the fourth paragraph of Section 3.13.5.3 has been reworded, and a refuge staff citation has been added. The text now reads: "Under the existing plan, most of the refuge, including those lands nearest to the proposed project site, is managed for its wildlife resources and wilderness values under the CCP management category 'Minimal Management' (Seim 2010; Reed 2010; USFWS 1988). The Mollie Beattie Wilderness is managed under the CCP management category 'Wilderness Management' and, as a Congressionally designated unit of the National Wilderness Preservation System, is subject also to the Wilderness Act and ANILCA. Until Congress acts to determine a definitive management direction for those portions of the refuge that are closest to the proposed Point Thomson Project (the western edge of the 1002 Area), 'Minimal Management' applies. The CCP defines Minimal Management as follows: ..." See also the response under Comment 335 regarding original purposes of the range/refuge. 346 In response to this comment, the full quotation has been included in the Final EIS, followed by the following text: "According to the USFWS as a cooperating agency for this EIS, currently, the portion of the refuge nearest to the project site is not managed to provide for prescribed burns, oil and gas studies, or structures associated with guiding or fisheries development; however, in accordance with existing law and policy, these activities remain available as management tools. Regarding management studies and survey/inventory programs, a wildlife research camp is established most summers on the Canning River delta."

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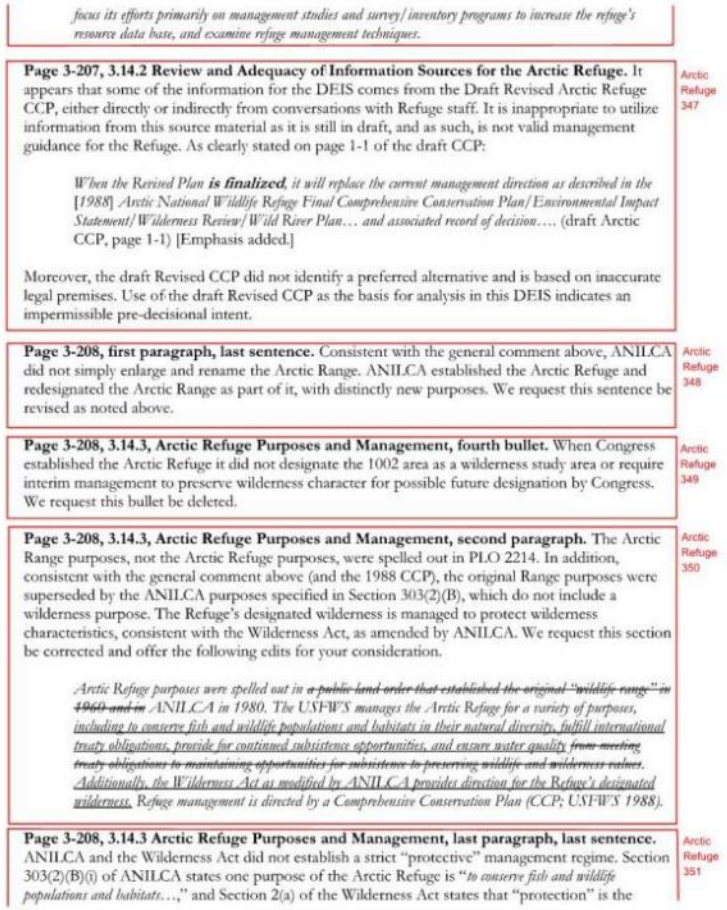	347 The existing 1988 CCP and discussion with refuge staff were the key sources of information for how the refuge is managed. The revised CCP/EIS draft was not referenced and was not used as the basis for analysis in the Draft EIS. 348 Text has been deleted. 349 The last bullet was in error and has been removed. 350 This comment has been addressed primarily by cross reference back to the Land Management section. The beginning of the second full paragraph in Section 3.14.3 now reads: "The Land Management section (3.13.5.3) addresses refuge purposes. Refuge management is directed by a CCP (USFWS 1988), also addressed in 3.13.5.3." 351 The sentence regarding "preserving" has been deleted from this paragraph. Text has been rewritten in select other instances. "Protection" has been changed to "conservation."

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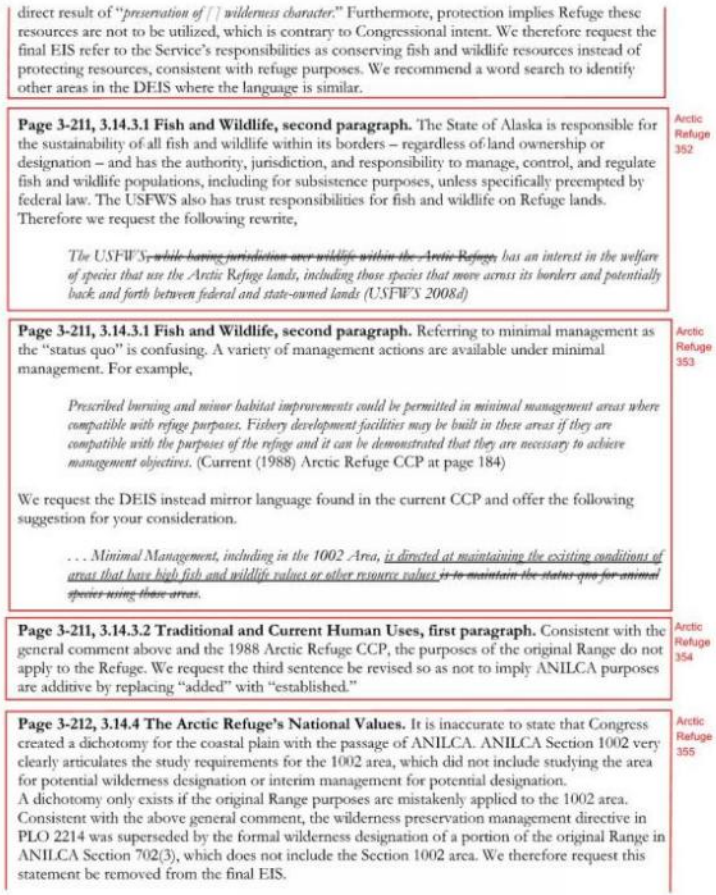	352 The second half of the paragraph has been rewritten to read as follows: "The USFWS shares responsibility for wildlife management within the Arctic Refuge with ADF&G, and has an interest in the welfare of species that move across its borders and potentially back and forth between federal and state-owned lands (USFWS 2008d). ADF&G manages wildlife populations within Alaska, regardless of land ownership." 353 This sentence has been revised as suggested: "...the focus of USFWS wildlife management in Minimal Management areas, including the portion of the refuge nearest to the project site, is 'maintaining existing conditions of areas that have high fish and wildlife values or other resource values.'" (See also the response to Comment 346.) 354 The use of the term "added" is from USFWS. No change made. 355 The word "dichotomy" has been removed in both instances but the intended meaning has not been altered. The first paragraph under 3.14.4 now reads: "Congress made the 1002 Area a study area for potential future oil and gas development and reserved decisions about long-term management of the area to itself. Congress has repeatedly considered opening the 1002 Area to oil and gas development, and has seen at least one bill proposing to designate the area as part of the National Wilderness Preservation System. Congress has not made a final decision, and the result has been the prominence of the Arctic Refuge in an ongoing national debate." The bottom of the sixth paragraph of Section 3.18.3 of the Final EIS now reads: "Because the Arctic Refuge has these wild qualities and because there has been an ongoing tension in the public between the national interest in tapping large oil and gas reserves in the refuge and the national interest in designation of the refuge's ACP as part of the National Wilderness Preservation System, the Arctic Refuge has garnered international attention and visitation."

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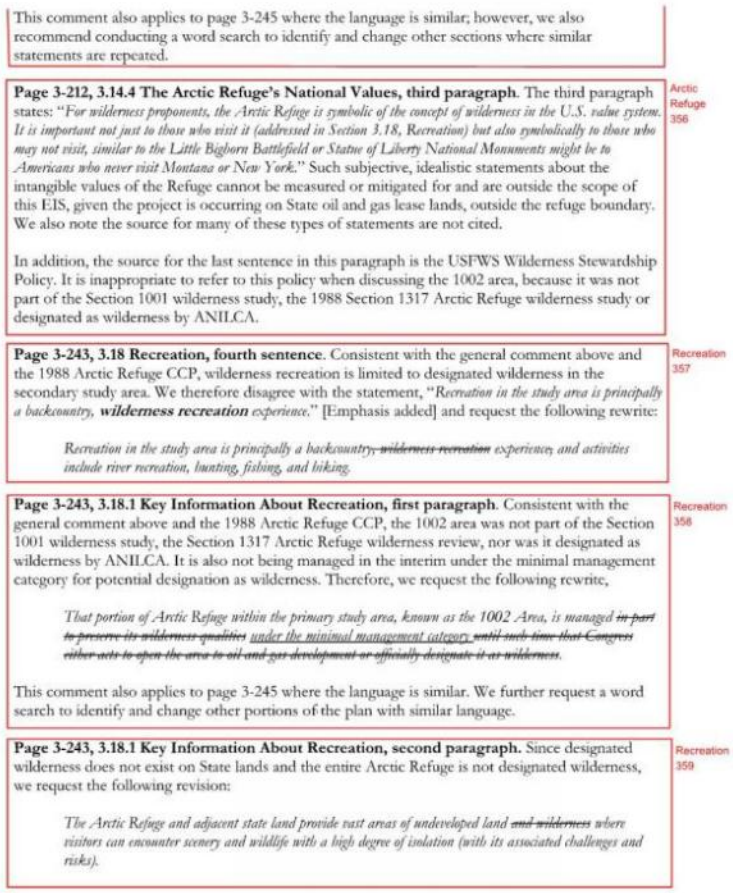	356 Intangible values can be measured in surveys, can be mitigated for, and are legitimate impact topics regardless of the management of adjacent state land. Further reading on the intangible values of wilderness nationally and in Alaska is in multiple publications, including in the book Wilderness and the American Mind (Nash 2001) and in government policy, both cited in this subsection of the Draft EIS. The citation of USFWS wilderness policy is appropriate because the policy addresses what are considered wilderness values and is relevant to what those seeking a "wilderness experience" might be seeking, whether or not such an experience is within a unit of the National Wilderness Preservation System. 357 Here, "wilderness" is used as defined in the dictionary. See response to Comment 336. The sentence has been revised to read: "Recreation in the study area is principally a backcountry recreation experience, and activities include river recreation, hunting, fishing, and hiking in an area with high wilderness qualities." 358 In Section 3.18.1, the sentence has been rewritten as follows: "The study area is generally undeveloped and, in the secondary study area, includes a portion of federally designated Mollie Beattie Wilderness of the Arctic Refuge. That portion of Arctic Refuge within the primary study area is managed in part for its wilderness qualities and for recreation suited to such an area." In Section 3.18.3, the middle of the fifth paragraph in the Final EIS has been rewritten as follows: "Whether on state or federal land, the recreation environment is similarly undeveloped and wild without communities or permanent habitations along the coast from Bullen Point to Kaktovik, a stretch of nearly 80 miles, and for much greater distances inland. There is no unit of the National Wilderness Preservation System in the primary study area. The closest corner of the Mollie Beattie Wilderness of the Arctic Refuge is 30 miles from the coast, measured from Point Thomson. The Arctic Refuge manages its land in the primary study area under its minimal management category in part for its wilderness values and for recreation in such an environment, although the area is not designated wilderness." 359 This text has been revised as follows: "The state land of the project site and the adjacent Arctic Refuge provide vast areas of principally undeveloped land where visitors can encounter wildlife and natural scenery with a high degree of isolation (and associated challenges and risks). Although these areas are not designated as part of the National Wilderness Preservation System as defined in federal law (16 USC 23) or part of a 'wilderness park,' as defined in state law (AS 41.21.990), the qualities of the recreation resource are currently the same 'wilderness qualities' found in designated areas. " See also the response to Comment 336.

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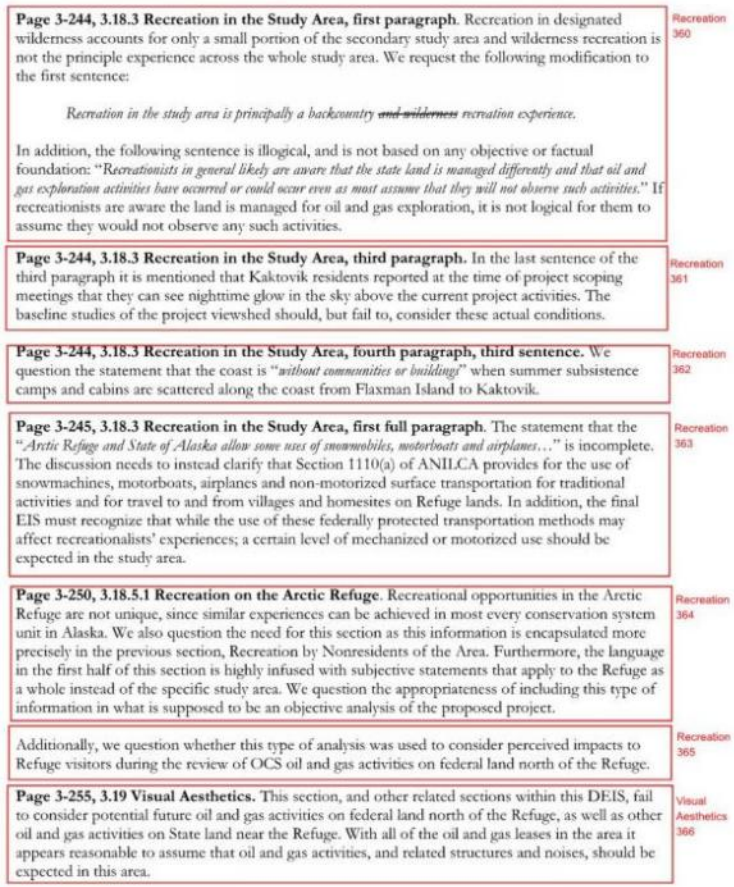	360 The text in question was added to the EIS in response to comments on the Preliminary Draft EIS to help clarify that there is a different management intent between state and federal land. The text has been revised as follows: "Despite management of state land specifically for oil and gas development, and despite widely-spaced oil and gas exploration activities in the past, most of the time both federal and state lands in the area appear quiet, remote, and wild. Regardless of the Point Thomson Project, further oil and gas activities could occur in the future and alter the recreation experience, especially on state lands." (See also the response to Comment 336.) 361 The visual baseline is explained in Section 5.19, Visual Aesthetics, and the Visual Assessment technical report is based on 2009 conditions without the lights and industrial activity proposed under the Applicant's 2010 permit application. See also the response to Comment 393. 362 The text has been changed to "without communities or permanent habitations." 363 Starting with the 4th sentence of this paragraph, the text has been modified for clarity: "Although the Arctic Refuge and State of Alaska allow some uses of snowmobiles, motorboats, and airplanes on their lands, the recreational attraction is that the area is undeveloped, quiet, and wild. ANILCA provides for motorized uses for traditional activities and for travel to and from villages and homesites on Refuge lands. The State of Alaska restricts motorized overland travel except for subsistence. Observation of aircraft, boats on the ocean, and snowmobiles occurs at low levels." 364 The specific landscape is important to these types of recreational experiences. This section is a subsection of Recreation by Nonresidents of the Area and is appropriately in its own subsection in order to discern differences between recreation on the different types of managed lands within the project area. Establishing the existing conditions and uses are important for the impacts analysis discussed in Chapter 5. 365 The approach to evaluation of impacts for any given project is unique for each project. The effects of OCS activity would be 12-15 miles offshore from the refuge coast and different than onshore activity 2-8 miles away from the refuge border. 366 See responses to Comments 338, 340, and 342.

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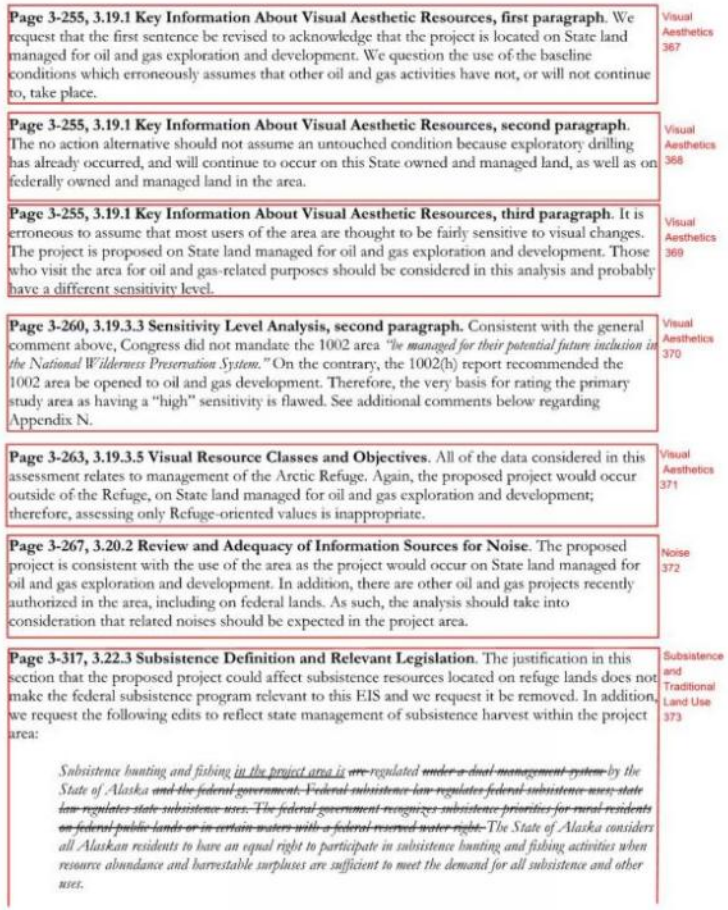	367 The first sentence of Section 3.19.1 has been revised to read: "The project is located on state land, managed for oil and gas development, and is in a minimally developed and uninhabited area." Regarding previous and future activities, see also responses to Comments 338 and 340. 368 Regarding previous and future activities, see responses to Comments 338, 340, and 342. Gravel pads that still exist from prior exploration are visually of low contrast and are considered in the No Action Alternative. Visually, from the key observation points, it is the long-term and permanent structures and associated lights, plumes, etc. that are a visual issue. 369 The cited paragraph is a summary of the rest of the visual section, which in turn is a summary of the visual technical report (Appendix N). The visual analysis acknowledges the presence of industrial workers in Section 3.19.3.3 of the EIS, and the sentence has been further clarified to read: "Sensitivity is based on…types of users (primary users are local residents and visiting recreationists, who are thought to be fairly sensitive viewers, and industrial workers who are likely to be less sensitive)." The technical report in Appendix N more fully describes differences in sensitivity levels among user types, including industrial workers, in Section 3.3.1.3. 370 The first sentence of the second paragraph has been rewritten as follows: "Arctic Refuge lands in the primary study area are rated 'high' sensitivity because the refuge manages the land, in part, to maintain its existing natural visual environment and because refuge lands are more sensitive among the public than nearby state lands." The sensitivity rating is retained. See also the discussion under responses to Comments 396 and 336. It is not the entirety of the primary study area that has a "high" sensitivity rating; it is the refuge portion. 371 The cited section addresses both Refuge lands and state lands explicitly. The project would be visible from refuge lands; therefore the Refuge is addressed. Refuge visual values are given space in the text and State visual values are not, because the refuge has some visual management guidelines and the State does not. The visual values associated with a principally undeveloped visual landscape occur also on state lands, regardless of management. 372 The consistency of the project with land use and management is discussed in Section 3.13, Land Ownership, Land Use, and Land Management, where it is noted that the project would be located on land that is managed by the State of Alaska for oil and gas development. The noise impact analysis uses the existing noise levels measured at six different sites in the study area to determine a baseline condition. The existing condition does not include other potential uses in the area. However, the potential effects to noise from reasonably foreseeable future actions, including future oil and gas exploration in the study area, are discussed in the cumulative impacts analysis for noise, Section 5.20.10.2. 373 The purpose of the discussion of federal subsistence regulations in Section 3.22.3, Subsistence Definition and Relevant Legislation is to describe the baseline

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	conditions for subsistence in the study area communities, not to suggest that federal regulations apply to the project area. The discussion is intended to provide an understanding of subsistence on the North Slope.

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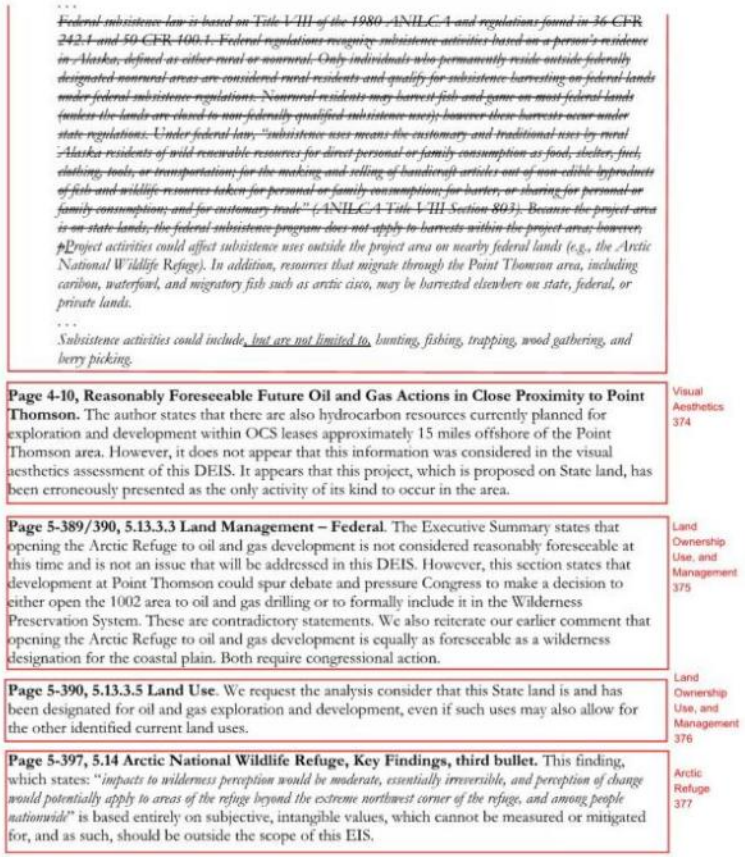	374 See responses to Comments 338 and 340. Reasonably Forseeable Future Actions are addressed in relation to visual resources in the cumulative impacts analysis, Section 5.19.7.2 of the Draft EIS. 375 The following text has been added "or designation of the 1002 Area as part of the National Wilderness Preservation System." The potential for heightened debate is a potential impact of the proposed project. A decision by Congress (an action) to either open the 1002 Area for O&G development or include it in the NWPS, is not a reasonably foreseeable future action based simply on the definition of reasonably foreseeable future actions in Section 4.2 of the Draft EIS "RFFAs are those that are likely or reasonably certain to occur." See also the response to Comment 378. 376 The cited section is specifically meant to address land use. The immediately preceding section addresses land management. The cited section already states the land use on state land could change to oil and gas development, "which is consistent with the state's certification order and the intent of the oil and gas and gas-only lease program." Further clarification has been added in the first two paragraphs to indicate industrial uses are "consistent with the state's management intent." 377 See the response to Comment 356.

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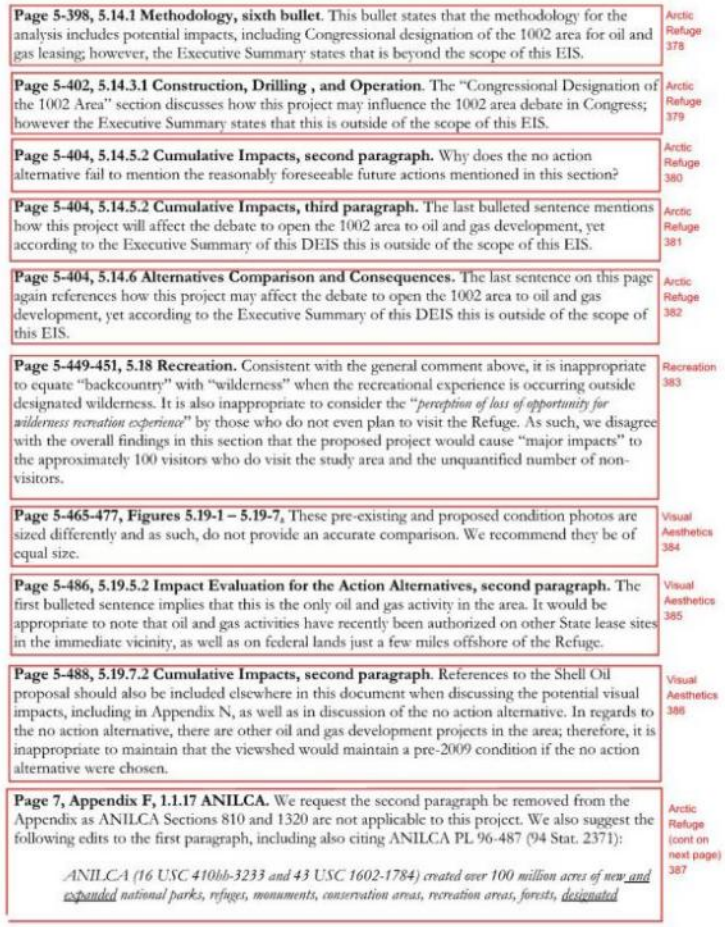	378 The sixth bullet is part of a list of "types of impacts" that "could include" impacts such as changes to designation of the 1002 Area. However, such impacts were found not reasonably foreseeable. Page ES-5 in the Executive Summary of the Draft EIS indicates that impacts of opening the 1002 Area to oil and gas development are not addressed in this EIS because opening the 1002 Area is not a reasonably foreseeable future action; however, that does not preclude mention of the potential for the heightening of debate. See also responses to Comments 375, 379, and 380. 379 The text was clarified as follows: "The Corps acknowledges that approval of any of the development alternatives could become another point of discussion in the debate concerning opening the 1002 Area to oil and gas leasing versus formal designation of the area as part of the National Wilderness Preservation System. Although the outcome of any such debate is unknown, the Corps acknowledges the potential that approval of any of the action alternatives could result in heightened debate in Congress that could spur a decision. Because there is no way to know whether Congress would change the 1002 Area status—and if changed, whether it would lean toward preservation of wilderness qualities or toward development of hydrocarbons—impacts of this decision cannot be evaluated in this EIS. " 380 Direct and indirect (or secondary) impacts of the No Action Alternative are addressed in Section 5.14.2. Under NEPA, reasonably foreseeable future actions are addressed as part of cumulative impacts assessment but not assessment of direct or indirect impacts, based on the definition of cumulative impacts. As defined in Chapter 4, cumulative impacts are those that combine impacts of the proposed action with other past, present, and reasonably foreseeable future actions. Cumulative impact assessment generally focuses on action alternatives, not on the No Action Alternative.. 381 See responses to Comments 342 and 375. The last portion of the bulleted sentence--"...which would result in impacts..."--has been removed. 382 See the responses to Comments 342 and 378. 383 The term "wilderness" as defined in the dictionary is appropriate for discussion of state and federal lands in this area that are not part of the National Wilderness Preservation System. Regarding the opportunity for a recreation experience with high wilderness qualities and values, creation or loss of opportunity are appropriate effects to address in an EIS. The loss of a recreation opportunity affects a wide range of potential visitors, from those actively planning a trip to those who might like to visit someday in the indeterminate future. Many may never physically visit, but the opportunity itself is valuable. See also responses to Comments 336 and 357. 384 The images have been made equal in size and put on individual pages for the Final EIS. 385 The text says "As the first major development in the study area...," which implies there may be other major developments in the future. See also the response to

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	Comment 340. 386 The cumulative impacts section of the EIS discusses reasonably foreseeable future actions and is the section that discusses other developments that may occur and that may create impacts of their own. Note that Appendix N addresses only direct impacts of this project and does not address cumulative impacts. The baseline condition is the point of comparison based on the conditions around the time that the Applicant submitted their DOA permit application. See also responses to Comments 338, 340, and 342. 387 The second paragraph on ANILCA has been removed as not applicable to the Point Thomson Project, and the first paragraph has been rewritten as follows: "ANILCA (PL 96-487) created or expanded more than 100 million acres of national parks, wildlife refuges, monuments, conservation areas, recreation areas, forests, and wild and scenic rivers on federal lands in the State of Alaska for the preservation of 'nationally significant natural, scenic, historic, archeological, geological, scientific, wilderness, cultural, recreational, and wildlife values.' Among these is the Arctic National Wildlife Refuge. ANILCA includes a number of provisions intended to allow for infrastructure and economic growth in general, travel and access in conservation system units, and pursuit of a subsistence lifestyle, while protecting resource values. ANILCA helps provide context for evaluation of potential effects to the Arctic Refuge, but ANILCA provisions do not apply beyond the refuge boundary and do not apply to the State of Alaska lands on which the Point Thomson Project is proposed."

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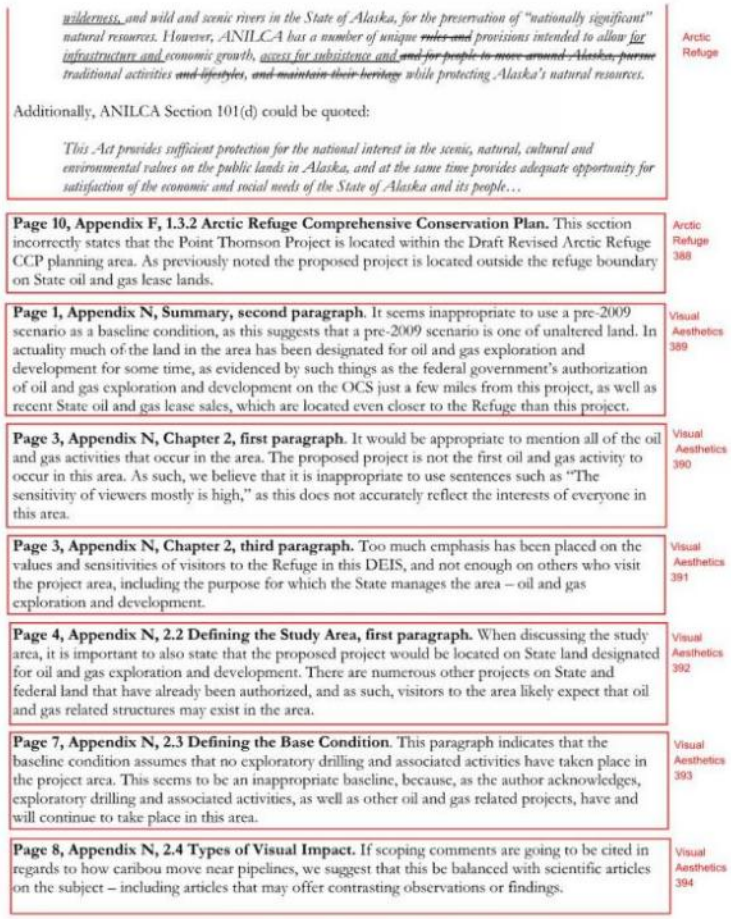
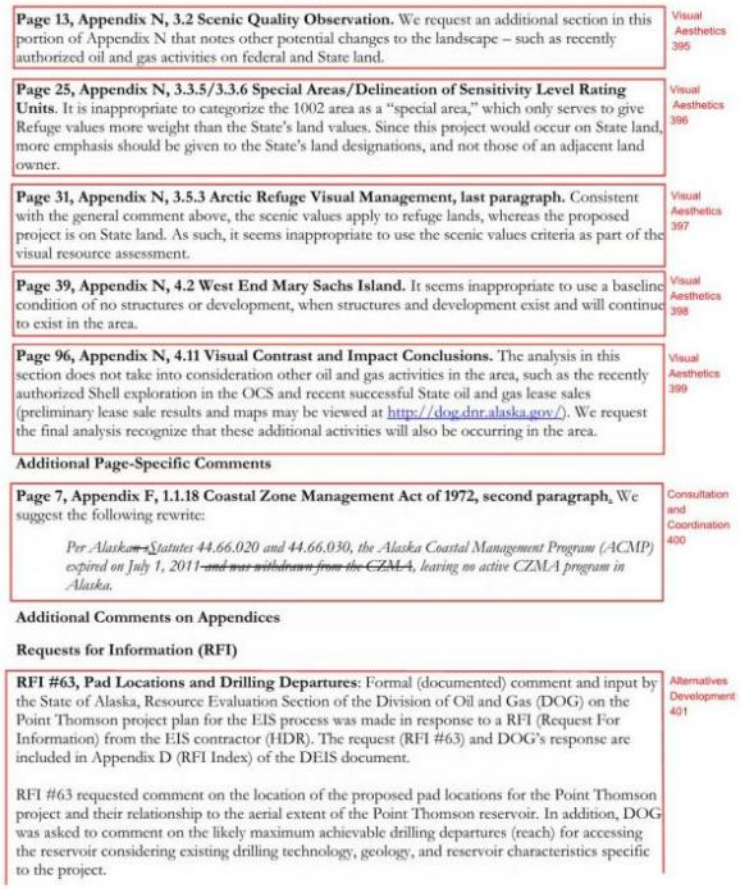
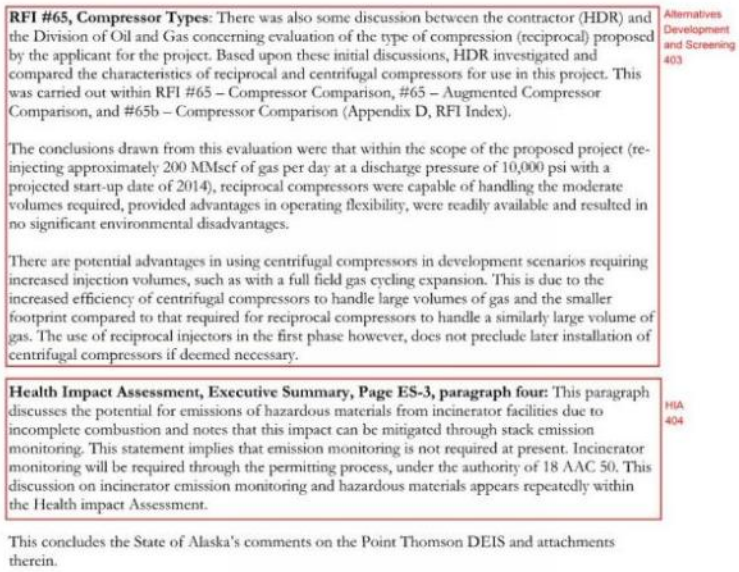
	388 The sentence has been removed and the paragraph rewritten. It now reads: "The Arctic Refuge CCP was developed in 1988 as directed under ANILCA 304(g) to provide a broad management framework for visitor use, development, and resource management. Direction in a CCP is based on 'the purposes of the refuge, its significant values, the activities occurring (on the refuge at the time of publication), and the resolution of any major issues surrounding possible land use conflicts within and adjacent to the refuge.' The USFWS has been revising the CCP and a Draft CCP was released for public comment in August 2011. A Record of Decision is expected by the end of 2012. The CCP helps provide context for evaluation of potential effects to the Arctic Refuge, but its provisions do not apply beyond the refuge boundary and do not apply to the State of Alaska lands on which the Point Thomson Project is proposed." 389 See responses to Comments 340 and 385. The baseline being referenced is not for land management but for the visual resource. As seen from key observation points, the existing condition is gravel pads with minimal equipment as presented in the baseline discussed in Section 2.3 of Appendix N. 390 "Oil and gas exploration activities" was added to the list of activities that occur. Also, the "sensitivity" sentence was clarified as follows: "The sensitivity of most viewers, with the exception of industrial workers, is high." These are introductory and summary paragraphs; details are further explained in Section 3.3.1. 391 The third paragraph regarding wilderness has been rewritten to clarify where formal designation as part of the National Wilderness Preservation System applies and where it does not, and to include state lands: "Discussion of de facto and wilderness as defined in a dictionary and discussion of the National Wilderness Preservation System (federally designated wilderness) recurs in this document because state lands where the project is proposed and adjacent federal lands are principally undeveloped and wild, and because the Mollie Beattie Wilderness, designated by Congress in the Alaska National Interest Lands Conservation Act (ANILCA), occurs within the boundaries of the Arctic Refuge and visual impacts there have been a subject of interest for the land manager. The nearest corner of the Mollie Beattie Wilderness lies about 30 miles from the arctic coast and proposed project site. However, wilderness qualities, including natural scenery, are an important part of the refuge and its management even outside the designated wilderness area." 392 The first paragraph has been revised for clarification as follows: "The proposed Point Thomson Project is located on state lands in a flat landscape that offers views to distant horizons. Also, the project is located in a principally undeveloped environment adjacent to Arctic Refuge lands valued for wilderness qualities. The same qualities exist on state land, although the state's management is focused on oil and gas development. Because the presence of human development in a backcountry or nondesignated wilderness environment may be a determinant of a visual impact (see Section 2.3), and because the area's uninterrupted views may allow visibility of the project from inside the refuge and its designated Mollie

Comment	Response
	Beattie Wilderness, the project area for visual assessment purposes is defined based on the concept of “visibility,” as further described below." 393 Three sentences of clarification have been added at the end of the Base Conditions paragraph: "The baseline condition in the general area is not static, however, as intermittent industrial activity has occurred occasionally over several decades. At these times, activities have temporarily introduced visually contrasting structures, camps, lights, and motion, and such intermittent activity would likely occur in the future even without the project. While these temporary activities are acknowledged, the focus of this visual assessment is on larger, very long-term, year-round visual changes from the proposed project that would be essentially permanent." 394 On page 8 of Appendix N, the intent is to say there was a public concern and the visual assessment will include motion and reflection, which is otherwise not directly addressed in BLM methods. Section 4.10.2 of Appendix N presents discussion of impacts to caribou movement. This visual report briefly addresses the motion and reflection aspects of the project, but leaves it to the wildlife section of the EIS to address biological impacts regarding pipelines

Comment	Response
	395 The EIS discusses the Shell Oil offshore exploration proposal and other reasonably foreseeable future actions in the cumulative impacts analysis in chapter 4. Reference to other potential oil and gas projects in Appendix N would not change the visual contrast of this project when compared with the baseline, which is the purpose the visual assessment contained in Appendix N. See also responses to Comments 340, 342, and 399. 396 The process defined a study area, which included both the state lands of the proposed project site and federal lands at the edge of the Arctic Refuge. As indicated at the opening line of 3.3 in the Appendix N, "sensitivity levels are a measure of public concern for scenic quality. Public lands are assigned high, medium, or low sensitivity levels by analyzing the various indicators of public concern." The BLM visual inventory method indicates that lands like the refuge have greater indication of public concern than state lands, even though visually they are the same at the boundary. Because the land originally was understood to be a formal wilderness study area, the "special area" designation seemed to apply unquestionably. The text has been modified to indicate it is not a wilderness study area. However, the sensitivity rating is based on several factors, and the "measure of public concern for scenic quality" still appears high. See also response to Comment 370. The "Special Areas" paragraph (3.3.5) in Appendix N has been revised as follows: "BLM Manual 8410 describes 'special areas' in part by example, including 'Natural Areas, Wilderness or Wilderness Study Areas, Wild and Scenic Rivers, ' and several others. Manual 8410 also emphasizes management objectives, stating that designation as one of the example types 'does not necessarily mean that these areas are scenic, but rather that one of the management objectives may be to preserve the natural landscape setting.' The '1002 Area' of the Arctic Refuge is a 'minimal management' area that has a high profile among the public nationally, among the land managers, and among elected officials. It is managed in part to maintain the existing natural landscape setting and visual values, which include seeing little or no human development. The 1002 Area is not one of the named examples of 'special areas' in the BLM manual, which is focused on BLM categories, but its 'minimal management' status under the USFWS and its high profile make it similar to a 'special area' as defined and, in any case, more sensitive than the adjacent state land on which the project is proposed. The state land is not included in any special area of this kind. Rather, the proposed project site is managed as an oil and gas lease sale area by the Alaska Division of Oil and Gas." 397 Scenic values apply to *the view from* refuge lands as well as the *view from state* lands, whether or not the view is of like lands or lands managed differently. 398 This comment is specific to the Mary Sachs Island key observation point and the view of the project site from that KOP. The visual simulations were prepared before exploratory drilling was finished, and at that time, the visual assessment team did not have information about well covers. The EIS text updates the Appendix N information with reference to the well covers, including a photograph

Comment	Response
	of the well covers, so that decision makers and the public can see them. The well covers do not substantially influence the analysis, because they have much less mass and height than proposed facilities. There are no existing structures in this view except the well pad and well covers. See also the response to Comment 393. 399 Other oil and gas activities are addressed under cumulative impacts in the EIS. The direct impacts of the Point Thomson Project alone are the subject of Appendix N. See also the response to Comment 395. 400 The correction was made. 401 Comment is continued as Comment 402. See response to Comment 402.

Comment	Response
	402 In the Applicant's Technical Brief #1, they stated that a "Pad location further inland from the coast will increase the throw on all wells and potentially preclude the ability to reach portions of the reservoir necessary for full field development. This may lead to additional pads being needed in the future to reach bottomhole targets that cannot be reached from a pad that has been located further inland." In other words, a trade-off of moving pads inland would be the potential future need for additional pads closer to the reservoir (i.e., along the coast) in order to reach bottomhole targets, given the present 13,000-foot limit of extended-reach drilling.

Comment	Response
 **RFI #65, Compressor Types**: There was also some discussion between the contractor (HDR) and the Division of Oil and Gas concerning evaluation of the type of compression (reciprocal) proposed by the applicant for the project. Based upon these initial discussions, HDR investigated and compared the characteristics of reciprocal and centrifugal compressors for use in this project. This was carried out within RFI #65 – Compressor Comparison, #65 – Augmented Compressor Comparison, and #65b – Compressor Comparison (Appendix D, RFI Index). The conclusions drawn from this evaluation were that within the scope of the proposed project (re-injecting approximately 200 MMscf of gas per day at a discharge pressure of 10,000 psi with a projected start-up date of 2014), reciprocal compressors were capable of handling the moderate volumes required, provided advantages in operating flexibility, were readily available and resulted in no significant environmental disadvantages. There are potential advantages in using centrifugal compressors in development scenarios requiring increased injection volumes, such as with a full field gas cycling expansion. This is due to the increased efficiency of centrifugal compressors to handle large volumes of gas and the smaller footprint compared to that required for reciprocal compressors to handle a similarly large volume of gas. The use of reciprocal injectors in the first phase however, does not preclude later installation of centrifugal compressors if deemed necessary. Alternatives Development and Screening 403 **Health Impact Assessment, Executive Summary, Page ES-3, paragraph four:** This paragraph discusses the potential for emissions of hazardous materials from incinerator facilities due to incomplete combustion and notes that this impact can be mitigated through stack emission monitoring. This statement implies that emission monitoring is not required at present. Incinerator monitoring will be required through the permitting process, under the authority of 18 AAC 50. This discussion on incinerator emission monitoring and hazardous materials appears repeatedly within the Health impact Assessment. HIA 404 This concludes the State of Alaska's comments on the Point Thomson DEIS and attachments therein.	403 The Draft EIS stated that the use of reciprocal compressors did not preclude the use of centrifugal compressors in the future. Section 2.3.1.5, Component: Centrifugal Compression, cites RFI 65b in stating, while centrifugal compression was dismissed from consideration for the current project's gas cycling function, selection of reciprocal compression for condensate production does not preclude the future use of a centrifugal compressor in the event that Point Thomson is developed for natural gas production. 404 The Health Impact Assessment was prepared by the Alaska Department of Health and Social Services and was included in the EIS as supplemental information. Section 5.23, Human Health, of the EIS contains findings of this HIA. The issue regarding stack emissions was clarified in Sections 5.23.3.1 (Alternative B: Construction and Drilling) and 5.23 by stating the following: "While emissions would be regulated through the air permitting process and emissions would likely be rapidly diffused over a wide area,…."

Comment	Response
	Attachment to Comment 0105_Sean.Parnell_SGOV Attachment not coded

STATE CAPITOL
PO Box 110001
Juneau, Alaska 99811-0001
907-465-3500
fax: 907-465-3532

Governor Sean Parnell
STATE OF ALASKA

550 West 7th Avenue # 1700
Anchorage, Alaska 99501
907-269-7450
fax 907-269-7463
www.Gov.Alaska.Gov
Governor@Alaska.Gov

October 31, 2011

The Honorable Ken Salazar
Secretary
Department of the Interior
United States Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Mr. Secretary,

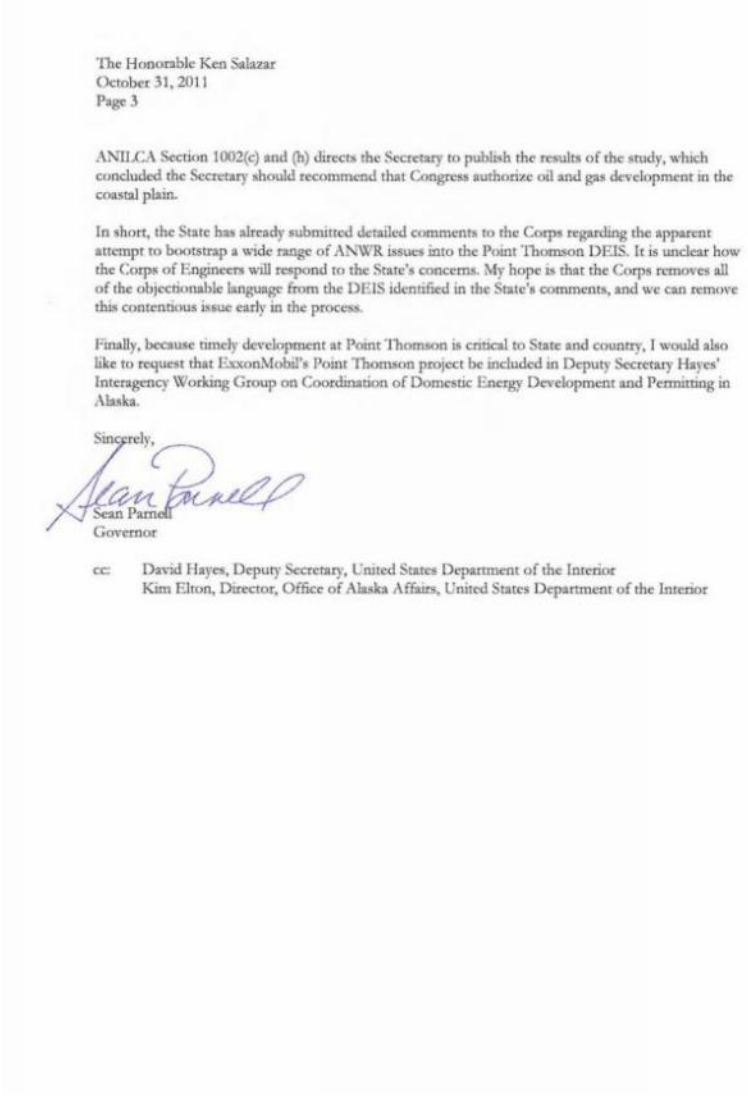
The Obama Administration has taken positive steps on several fronts to increase coordination between the federal government and the State of Alaska, which has improved our working relationship. We appreciate these efforts.

In the spirit of open communication between State and federal government, I am writing to convey my significant concern over the preliminary Draft Environmental Impact Statement (DEIS) for ExxonMobil's Point Thomson development project, which the Corps of Engineers recently circulated to the State and other Cooperating Agencies for comment.

First some background. The Point Thomson field is on State land near the 1002 Area of the Arctic National Wildlife Refuge (ANWR). This field is one of the largest undeveloped oil and gas fields in North America. This area is estimated to have well over 400 million barrels of oil and gas condensates and over eight trillion cubic feet of natural gas. Point Thomson's timely development will provide enormous benefits to the State and country and will lead to more jobs, significant revenue, and enhanced energy security. Furthermore, increased domestic production from Point Thomson will extend the life of the Trans Alaska Pipeline System (TAPS). The field's development is also a necessary prerequisite for a natural gas pipeline from the North Slope. For these reasons, I have taken a personal interest in ensuring that ExxonMobil diligently moves forward with production in a manner that advances the State's interests.

Unfortunately, the Point Thomson DEIS is another example of federal overreach on State lands. It has come to my attention that the Point Thomson DEIS includes ANWR in its evaluation "due to its proximity to the project" and assumes that activities occurring outside refuge boundaries could impact ANWR's "wilderness values." Indeed, based on the Department of the Interior's input, the DEIS spends considerable effort evaluating the potential impacts of the Point Thomson project on refuge "values," including wilderness, aesthetic, and national values, which are very subjective and difficult to quantify.

Comment	Response
The Honorable Ken Salazar October 31, 2011 Page 2 It is disconcerting that the DEIS places so much emphasis on the proposed project's proximity to ANWR and implies that the State should manage its adjacent lands as if they were part of the refuge. We have serious issues with the appropriateness of the DEIS assessing such impacts when the project is located on State lands designated for oil and gas development, well outside refuge boundaries. Moreover, a huge portion of ANWR already includes over eight million acres that are designated as "wilderness", and ANWR also encompasses vast ecosystems that are specifically designed to protect fish, wildlife, and wilderness values. Therefore, there is no reason to extend ANWR's reach beyond its boundaries. The DEIS also conflicts with the Department of the Interior's 1988 "Arctic Refuge Comprehensive Conservation Plan", which stated that the Fish and Wildlife Service has no authority to regulate lands outside of the refuge: > What impact will the comprehensive conservation plan have on impacts from developments on adjacent lands? > This is not a significant issue for the plan. The plan cannot address this question because *the Service has no authority to regulate the use of lands outside the refuge or the activities that occur on those lands.* In all of the alternatives, however, the Service will work with adjacent landowners to minimize the potential for impacts from their activities and developments. If refuge resources are adversely affected by off-refuge development, the Service would have the same remedies under state and federal law that any landowner would have. The Service would cooperate with the appropriate agency(ies) to resolve the problem. The Service will rely on the U.S. Environmental Protection Agency, State of Alaska Department of Environmental Conservation, and other appropriate local, state and federal agencies to enforce compliance with environmental laws and pollution control standards (Page 39). The current Point Thomson DEIS, however, is a backdoor way to allow the Fish and Wildlife Service to regulate oil and gas activities on State lands. Thus, the State has requested, and is still requesting, that the DEIS clarify that the Fish and Wildlife Service's authority to manage the Refuge stops at ANWR's boundary. Finally, the DEIS contains an additional fatal flaw – it inaccurately states that the Alaska National Interest Lands Conservation Act (ANILCA) stipulated the 1002 coastal plain "*was to be managed as a wilderness study area*" (page ES 52). As my administration has repeatedly stated in letters and conversations with your agency, this is not what ANILCA says. ANILCA Section 1002(a) directed the Secretary of Interior to study the ANWR coastal plain "to provide for a comprehensive and continuing inventory and assessment of the fish and wildlife resources of the coastal plain of the Arctic National Wildlife Refuge; an analysis of the impacts of oil and gas exploration, development and production, and to authorize exploratory activity within the coastal plain in a manner that avoids significant adverse effects on the fish and wildlife and other resources."	Attachment to Comment 0105_Sean.Parnell_SGOV Attachment not coded

Comment	Response
	Attachment to Comment 0105_Sean.Parnell_SGOV Attachment not coded

The Honorable Ken Salazar
October 31, 2011
Page 3

ANILCA Section 1002(c) and (h) directs the Secretary to publish the results of the study, which concluded the Secretary should recommend that Congress authorize oil and gas development in the coastal plain.

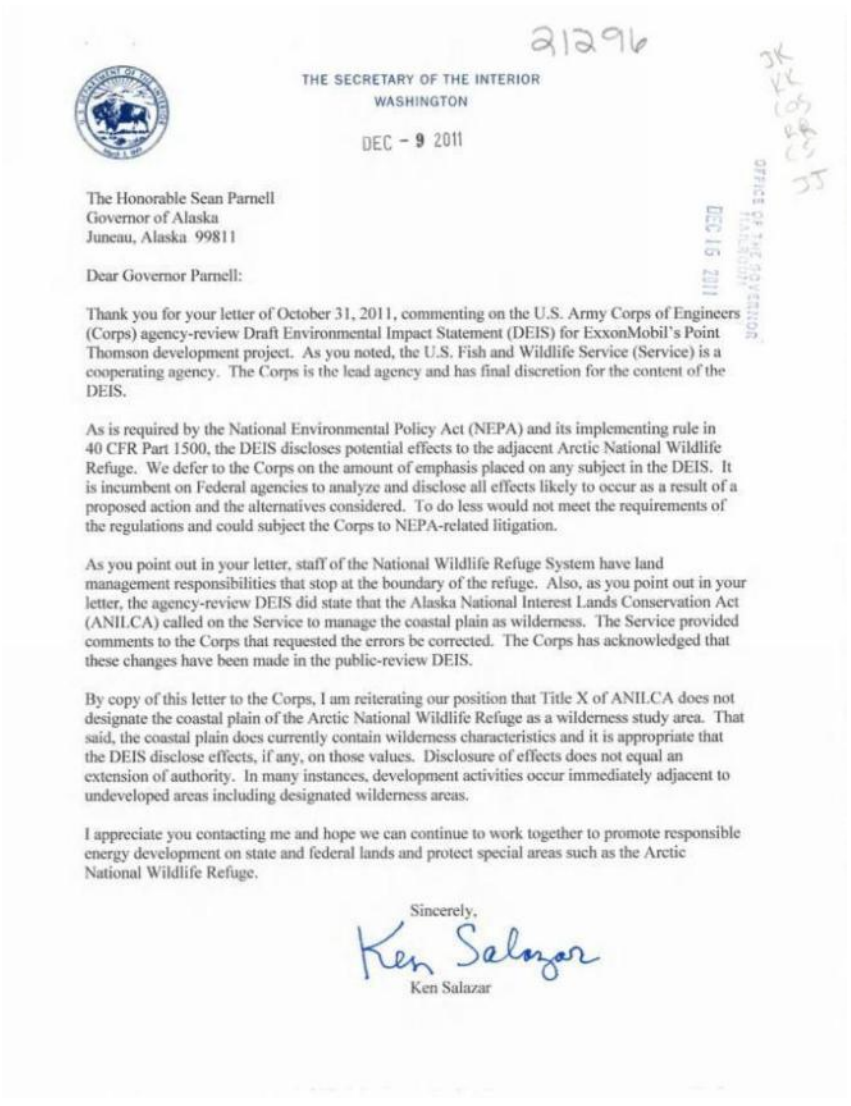
In short, the State has already submitted detailed comments to the Corps regarding the apparent attempt to bootstrap a wide range of ANWR issues into the Point Thomson DEIS. It is unclear how the Corps of Engineers will respond to the State's concerns. My hope is that the Corps removes all of the objectionable language from the DEIS identified in the State's comments, and we can remove this contentious issue early in the process.

Finally, because timely development at Point Thomson is critical to State and country, I would also like to request that ExxonMobil's Point Thomson project be included in Deputy Secretary Hayes' Interagency Working Group on Coordination of Domestic Energy Development and Permitting in Alaska.

Sincerely,

Sean Parnell
Governor

cc: David Hayes, Deputy Secretary, United States Department of the Interior
Kim Elton, Director, Office of Alaska Affairs, United States Department of the Interior

Comment	Response
	Attachment to Comment 0105_Sean.Parnell_SGOV Attachment not coded

21296

THE SECRETARY OF THE INTERIOR
WASHINGTON

DEC - 9 2011

The Honorable Sean Parnell
Governor of Alaska
Juneau, Alaska 99811

Dear Governor Parnell:

Thank you for your letter of October 31, 2011, commenting on the U.S. Army Corps of Engineers (Corps) agency-review Draft Environmental Impact Statement (DEIS) for ExxonMobil's Point Thomson development project. As you noted, the U.S. Fish and Wildlife Service (Service) is a cooperating agency. The Corps is the lead agency and has final discretion for the content of the DEIS.

As is required by the National Environmental Policy Act (NEPA) and its implementing rule in 40 CFR Part 1500, the DEIS discloses potential effects to the adjacent Arctic National Wildlife Refuge. We defer to the Corps on the amount of emphasis placed on any subject in the DEIS. It is incumbent on Federal agencies to analyze and disclose all effects likely to occur as a result of a proposed action and the alternatives considered. To do less would not meet the requirements of the regulations and could subject the Corps to NEPA-related litigation.

As you point out in your letter, staff of the National Wildlife Refuge System have land management responsibilities that stop at the boundary of the refuge. Also, as you point out in your letter, the agency-review DEIS did state that the Alaska National Interest Lands Conservation Act (ANILCA) called on the Service to manage the coastal plain as wilderness. The Service provided comments to the Corps that requested the errors be corrected. The Corps has acknowledged that these changes have been made in the public-review DEIS.

By copy of this letter to the Corps, I am reiterating our position that Title X of ANILCA does not designate the coastal plain of the Arctic National Wildlife Refuge as a wilderness study area. That said, the coastal plain does currently contain wilderness characteristics and it is appropriate that the DEIS disclose effects, if any, on those values. Disclosure of effects does not equal an extension of authority. In many instances, development activities occur immediately adjacent to undeveloped areas including designated wilderness areas.

I appreciate you contacting me and hope we can continue to work together to promote responsible energy development on state and federal lands and protect special areas such as the Arctic National Wildlife Refuge.

Sincerely,

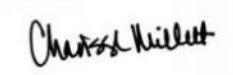
Ken Salazar

Ken Salazar

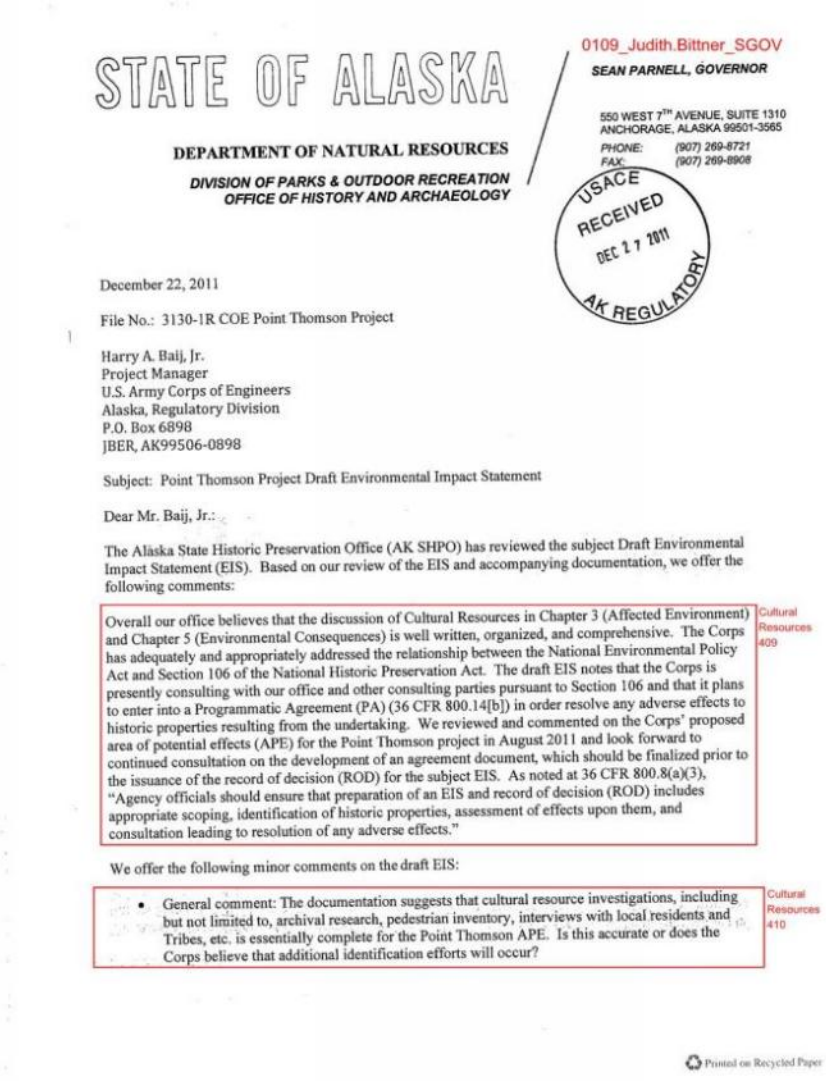
DEC 16 2011

Comment	Response
0106_Charlie.Huggins_SGOV **ALASKA STATE LEGISLATURE** Senate District H 600 E. Railroad Avenue Wasilla AK 99654 907-376-4866 907-373-4724 :Fax State Capitol Juneau AK 99801-1182 907-465-3878 Fax: 907-465-3265 800-862-3878 **Charlie Huggins** **Senator** December 19, 2011 Harry Baij, Jr Department of the Army U.S. Army Engineer District, Alaska Regulatory Division P.O. Box 6898 JBER, Alaska 99506-0898 Dear Mr. Baij, Statement of Support for Alternative B 406 I am writing this letter in regards to the recently released draft Environmental Impact Statement (DEIS) for Exxon Mobil's Point Thomson natural gas condensate project. Alaska is the storehouse for oil and gas that are so vital to our nation's economy and security. Point Thomson is essential to Alaska natural gas commercialization, as its fields contain approximately 25 percent of the North Slopes' known natural gas resources. The DEIS presents five alternatives; of those, I support Alternative B, which I understand will ensure safe and efficient operations and a minimal environmental footprint by incorporating a combination of summer barging, winter ice roads, aviation, and in-field roads. Through Alternative B, Exxon will implement comprehensive mitigation measures to minimize impacts on tundra, wildlife, aquatic resources, and subsistence activities. I believe Alaska and America need the resources and jobs that the Point Thomson project can provide. Of the design alternatives contained within the DEIS, Alternative B provides the safest, most environmentally responsible solution for developing those resources and I encourage your favorable consideration of this matter. Thank you for considering my views. Sincerely, Charlie Huggins Senator Senator_Charlie_Huggins@legis.state.ak.us www.aksenate.org/huggins/	406 Comment noted; no action required.

Comment	Response
0107_Charisse.Millet.SGOV **Alaska Legislature** **Representative Charisse Millett** Session: State Capitol Building, Room 13 Juneau, AK 99801 Phone (907) 465-3879 Fax (907) 465-2069 Toll free (888) 269-3879 Interim: Anchorage LIO 716 W 4th Ave., Room 390 Anchorage, AK 99501 Phone (907) 269-0222 Fax (907) 269-0223 *District 30* January 2, 2012 Mr. Harry Baij Jr. Department of the Army Engineer District, Alaska Regulatory Division P.O. Box 6898 JBER, Alaska 99508-0898 [RE: Alternative B, DEIS Point Thomson] Dear Mr. Baij, Statement of Support for Alternative B 407 The Point Thomson Project is one of the most important new petroleum fields in Alaska because it holds about 25 percent of the known natural gas reserves on the North Slope. It is unlikely any natural gas pipeline could ever be built without development at Point Thomson. ExxonMobil has submitted a development plan and your agency released a draft environmental impact statement with five alternatives. I urge your agency to adopt alternative B because it is the most environmentally sound plan that still allows the resources to be monetized in a cost effective manner. Point Thomson is a challenging project and will be very expensive to develop so it is important to avoid making costly requirements that create little if any environmental protection. ExxonMobil and its partners are taking extensive measures to protect the land, air, sea and wildlife. Subsistence activities will also be protected and respected under Alternative B. The economic benefits to the residents of Alaska are tremendous. New jobs, economic development and state revenue will all be created once the field is in operation.	407 Comment noted; no action required.

Comment	Response
Thank you for taking the time to read my comments on this very important issue and feel free to contact my office if you need any additional information. Sincerely,  Rep. Charisse Millett	

Comment	Response
Davis, Cecile 0108_Karl.Gohlke_Ind **From:** Alcantra, Rosetta M. **Sent:** Tuesday, January 03, 2012 11:03 AM **To:** Davis, Cecile **Subject:** 121911 Karl Gohlke Comment PTDEIS **From:** Baij, Harry A Jr POA [mailto:Harry.A.Baij@usace.army.mil] **Sent:** Saturday, December 31, 2011 9:24 AM **To:** Karl Gohlke **Cc:** Begier, Erin; Alcantra, Rosetta M. **Subject:** RE: Point Thomson Project EIS Public Comment Hi Karl, Thanks for your comments. They will be given full consideration and included in the administrative record. You may comment further until end-of-day Jan. 18, 2012. *Harry A. Baij Jr.* US Army Corps of Engineers, Alaska harry.a.baij@usace.army.mil Office: 907.753.2784 Cell: 907.350.5097 www.poa.usace.army.mil/reg **From:** Karl Gohlke [mailto:karlg@frontierplumbing.com] **Sent:** Monday, December 19, 2011 2:08 PM **To:** Baij, Harry A Jr POA **Cc:** BillV@FrontierSupply.com; aarona@FrontierSupply.com; 'Danielle Vivlamore'; 'Mike Sexton' **Subject:** Point Thomson Project EIS Public Comment Dear Mr. Harry Baij, I support the Point Thomson Project Alternative B for the following reasons: Statement of Support for Alternative B 408 - Alternate B ensures a minimal environmental footprint by incorporating a combination of summer coastal barging, winter ice roads, aviation, and in-field roads. These features are essential to the project's safe and efficient operations. - Alternative B provides the safest, most environmentally responsible solution for developing Point Thomson's resources in a timely, cost-effective manner. - Through Alternative B, ExxonMObil will implement comprehensive mitigation measures to tundra, wildlife, aquatic resources, and subsistence activities. - The point Thomson project will provide wide-ranging benefits to Alaska in the form of new business opportunities, jobs, and revenues. - Direct benefits to the State of Alaska from Point Thomson include training and jobs for Alaskans, new revenues to the state and local governments, increased business activity and revenue for the private sector. - Approval of the Point Thomson Project, as proposed by Alternative B, is critical to developing this world-class resource and securing Alaska's energy future. I look forward to seeing construction movement by the end of 2012 or the beginning of 2013. This is essential to Alaska natural gas commercialization, extending the life of the Trans Alaska Pipeline and the future wellbeing of Alaska. Sincerely, Karl 1	408 Comment noted; no action required.

Comment	Response
	409 A Programmatic Agreement is continuing to be developed with the intent that it will be finalized prior to the issuance of the Record of Decision (ROD) for the EIS. 410 Cultural resource investigations will continue, with additional identification efforts outlined in a Programmatic Agreement, being developed with the SHPO and consulting parties.

0109_Judith.Bittner_SGOV

STATE OF ALASKA

SEAN PARNELL, GOVERNOR

550 WEST 7TH AVENUE, SUITE 1310
ANCHORAGE, ALASKA 99501-3565
PHONE: (907) 269-8721
FAX: (907) 269-8908

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF PARKS & OUTDOOR RECREATION
OFFICE OF HISTORY AND ARCHAEOLOGY

USACE RECEIVED DEC 27 2011 AK REGULATORY

December 22, 2011

File No.: 3130-1R COE Point Thomson Project

Harry A. Baij, Jr.
Project Manager
U.S. Army Corps of Engineers
Alaska, Regulatory Division
P.O. Box 6898
JBER, AK99506-0898

Subject: Point Thomson Project Draft Environmental Impact Statement

Dear Mr. Baij, Jr.:

The Alaska State Historic Preservation Office (AK SHPO) has reviewed the subject Draft Environmental Impact Statement (EIS). Based on our review of the EIS and accompanying documentation, we offer the following comments:

Overall our office believes that the discussion of Cultural Resources in Chapter 3 (Affected Environment) and Chapter 5 (Environmental Consequences) is well written, organized, and comprehensive. The Corps has adequately and appropriately addressed the relationship between the National Environmental Policy Act and Section 106 of the National Historic Preservation Act. The draft EIS notes that the Corps is presently consulting with our office and other consulting parties pursuant to Section 106 and that it plans to enter into a Programmatic Agreement (PA) (36 CFR 800.14[b]) in order resolve any adverse effects to historic properties resulting from the undertaking. We reviewed and commented on the Corps' proposed area of potential effects (APE) for the Point Thomson project in August 2011 and look forward to continued consultation on the development of an agreement document, which should be finalized prior to the issuance of the record of decision (ROD) for the subject EIS. As noted at 36 CFR 800.8(a)(3), "Agency officials should ensure that preparation of an EIS and record of decision (ROD) includes appropriate scoping, identification of historic properties, assessment of effects upon them, and consultation leading to resolution of any adverse effects."

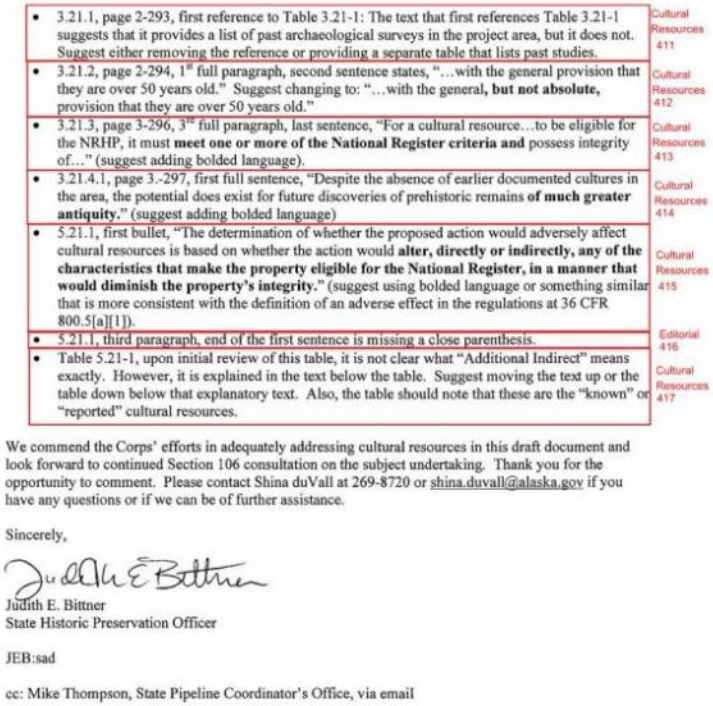
Cultural Resources 409

We offer the following minor comments on the draft EIS:

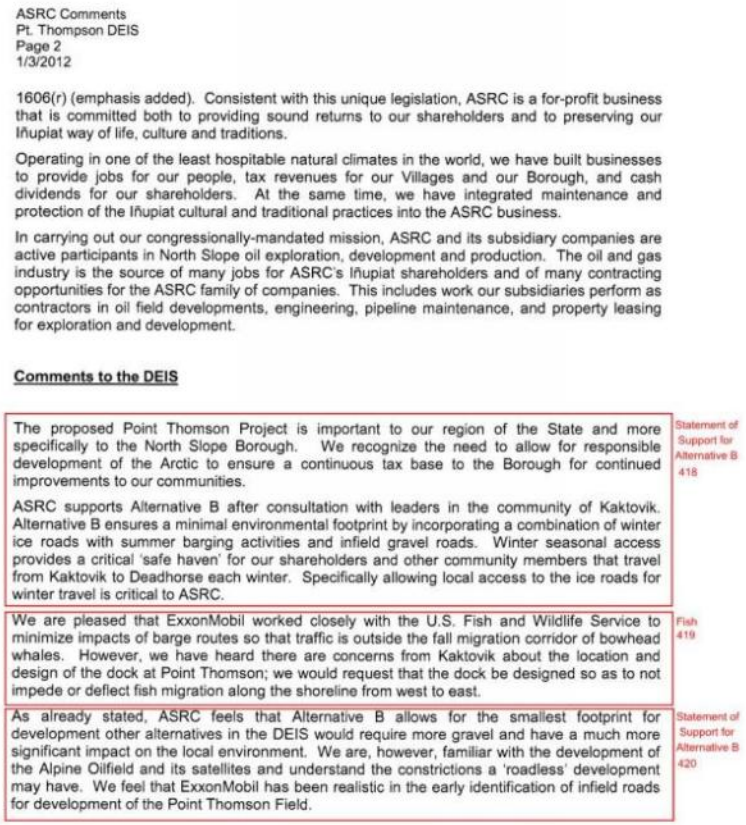
- General comment: The documentation suggests that cultural resource investigations, including but not limited to, archival research, pedestrian inventory, interviews with local residents and Tribes, etc. is essentially complete for the Point Thomson APE. Is this accurate or does the Corps believe that additional identification efforts will occur?

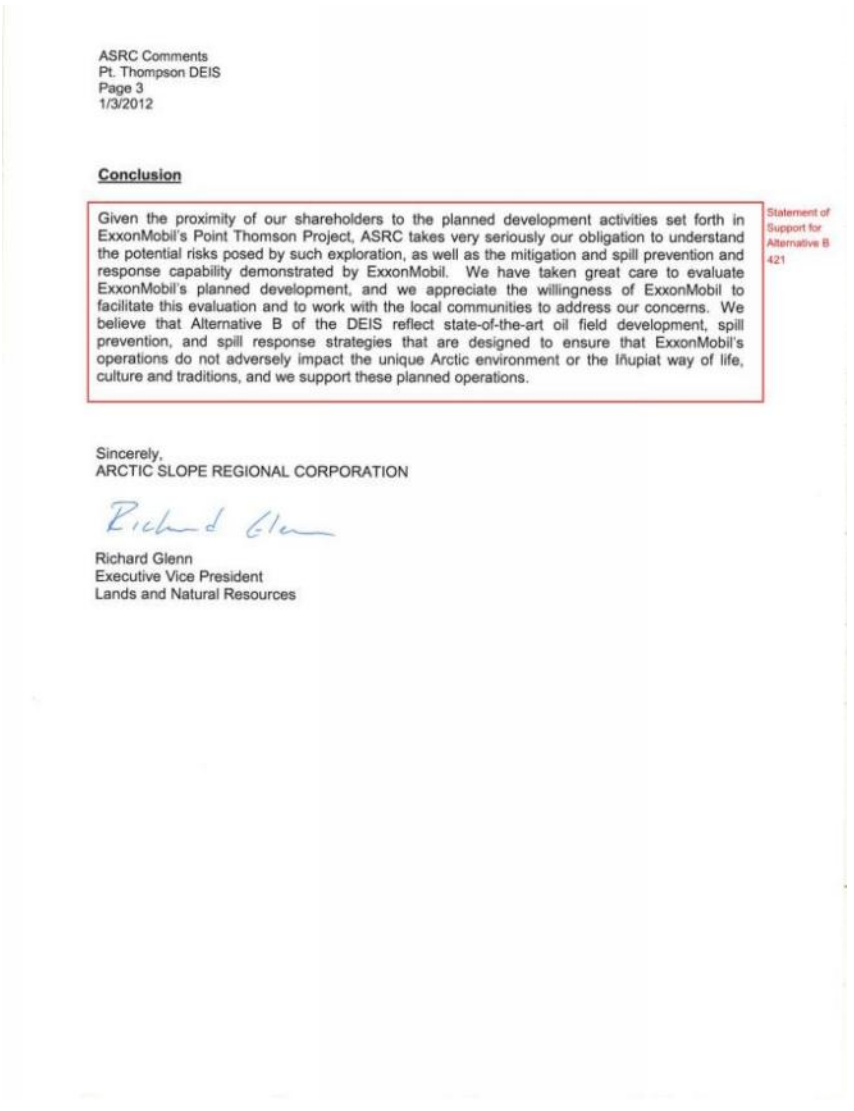
Cultural Resources 410

Printed on Recycled Paper

Comment	Response
	411 The text has been revised in this section to refer to the correct table. 412 The phrasing has been changed to: "…with the general, but not absolute, provision that they are over 50 years old" 413 The suggested text has been added. 414 The suggested text has been added. 415 The suggested text has been added. 416 The text has been corrected in the Final EIS. 417 The table has been moved below the text; all tables in this section have been updated to include the title "Documented Cultural Resources Potentially Affected," to clarify that these sites are identified, documented cultural resources in the project area.

Comment	Response
0110_Richard.Glenn_ACOR Anchorage Office • 3900 C Street, Suite 801 • Anchorage, Alaska 99503-5963 • 907.339.6000 • FAX 907.339.6028 • 1.800.770.2772 arctic slope regional corporation January 3, 2012 Hank Baij, Project Manager U.S. Army Corps of Engineers AK District, Regulatory Division P.O. Box 6898 JBER, Alaska 99506-0898 Phone: (907) 753-2784 **Re: Point Thomson Project Draft Environmental Impact Statement (DEIS)** Dear Mr. Baij: This letter provides Arctic Slope Regional Corporation's ("ASRC") comments in response to the U.S. Army Corps of Engineers ("Corps") request for public comment regarding Point Thomson Project Draft Environmental Impact Statement ("DEIS"). ASRC appreciates the Corp's efforts with respect to ensuring that oil and gas exploration and development in the Arctic, proceeds in a safe and thoughtful manner. ASRC has been involved in reviewing plans and submitting comments with respect to Arctic oil and gas development efforts on the North Slope, and we continue to believe that development of Alaska's petroleum resources can proceed safely and in a manner that protects the Arctic environment as well as the subsistence resource needs and culture of Alaska Natives. **Introduction** ASRC is an Alaska Native regional corporation created by Congress under the terms of the Alaska Native Claims Settlement Act of 1971 ("ANCSA"). *See* 43 U.S.C. § 1606. This landmark legislation extinguished Alaskan aboriginal land rights and authorized and directed Alaska Natives to adopt a western corporate model to manage lands, funds and natural resources. At ASRC, we have been able to successfully manage our assets consistent with our Iñupiat values. Under ANCSA, Iñupiat Eskimos living on the North Slope in 1971 were enrolled as shareholders in ASRC. ASRC has since issued additional shares to their descendants giving ASRC a shareholder base of approximately 11,000 Iñupiat Eskimos, most that reside on Alaska's North Slope. Through ANCSA, Congress created ASRC and directed that we use the North Slope's natural resources to benefit the Iñupiat people financially and culturally. Congress authorized ASRC "to provide benefits to its shareholders who are Natives or descendants of Natives or to its shareholders' immediate family members who are Natives or descendants of Natives to promote the *health, education or welfare* of such shareholders or family members." 43 U.S.C. § Corporate Headquarters • PO Box 129 • Barrow, Alaska 99723-0129 • 907.852.8533 or 907.852.8633 • FAX 907.852.5733	

Comment	Response
	418 Comment noted; no action required. 419 During the Scoping period the residents of Kaktovik expressed concern about the barge bridge impeding the movements of fish in east/west directions along the coast. The Draft EIS evaluated the potential impacts of the barge bridge on fish, determining that the gaps between the barges would allow fish to pass through and that the short-term duration of barge placement would further minimize impacts to fish movement. The sealift bulkhead would be constructed at the water's edge and would not impede fish movements. The coastal barge dock would be constructed by using pilings that would not impede fish movements. 420 Comment noted; no action required.

Comment	Response
	421 Comment noted; no action required.

ASRC Comments
Pt. Thompson DEIS
Page 3
1/3/2012

Conclusion

Given the proximity of our shareholders to the planned development activities set forth in ExxonMobil's Point Thomson Project, ASRC takes very seriously our obligation to understand the potential risks posed by such exploration, as well as the mitigation and spill prevention and response capability demonstrated by ExxonMobil. We have taken great care to evaluate ExxonMobil's planned development, and we appreciate the willingness of ExxonMobil to facilitate this evaluation and to work with the local communities to address our concerns. We believe that Alternative B of the DEIS reflect state-of-the-art oil field development, spill prevention, and spill response strategies that are designed to ensure that ExxonMobil's operations do not adversely impact the unique Arctic environment or the Iñupiat way of life, culture and traditions, and we support these planned operations.

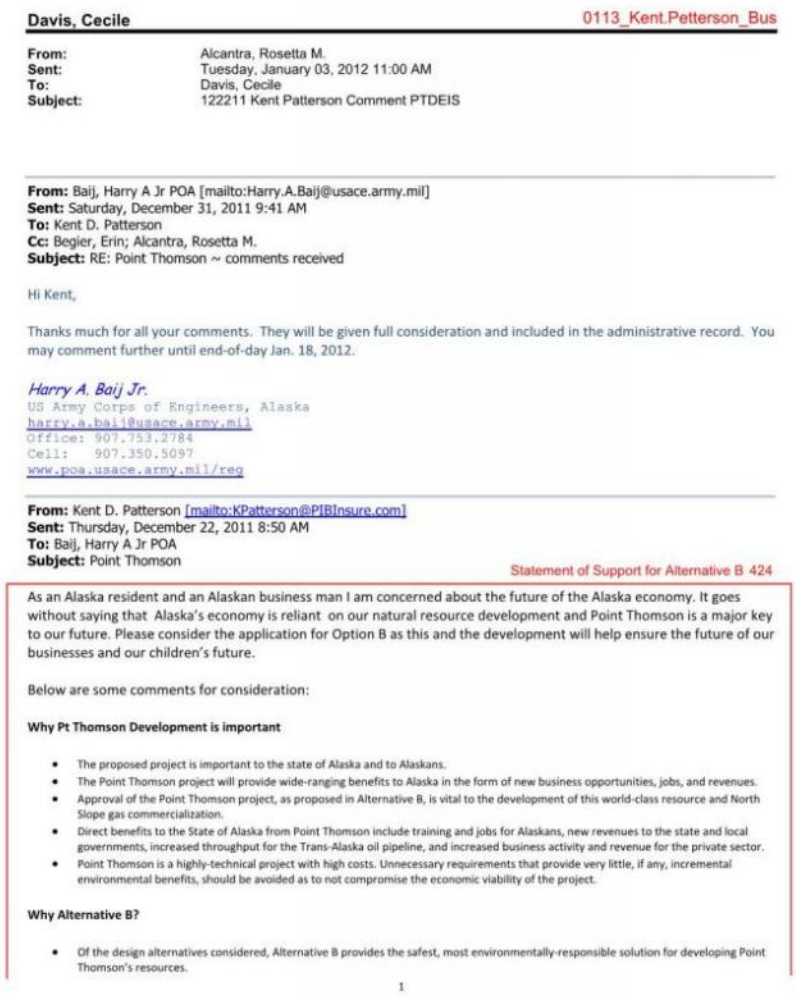
Statement of Support for Alternative B 421

Sincerely,
ARCTIC SLOPE REGIONAL CORPORATION

Richard Glenn
Executive Vice President
Lands and Natural Resources

Comment	Response
Davis, Cecile 0111_Bill.Vivlamore_Bus **From:** Alcantra, Rosetta M. **Sent:** Tuesday, January 03, 2012 11:01 AM **To:** Davis, Cecile **Subject:** 122011 Bill Vivlamore Comment PTDEIS **From:** Baij, Harry A Jr POA [mailto:Harry.A.Baij@usace.army.mil] **Sent:** Saturday, December 31, 2011 9:37 AM **To:** BillV@FrontierSupply.com **Cc:** Begier, Erin; Alcantra, Rosetta M. **Subject:** RE: Point Thomson Project EIS Public Comment ~ comments received Hi Bill, Thank you for your comments. They will be given full consideration and included in the administrative record. You may comment further until end-of-day Jan. 18, 2012. *Harry A. Baij Jr.* US Army Corps of Engineers, Alaska harry.a.baij@usace.army.mil Office: 907.753.2784 Cell: 907.350.5097 www.poa.usace.army.mil/reg **From:** Bill Vivlamore [mailto:BillV@FrontierSupply.com] **Sent:** Tuesday, December 20, 2011 3:16 PM **To:** Baij, Harry A Jr POA **Subject:** Point Thomson Project EIS Public Comment Dear Mr. Harry Baij, I support the Point Thomson Project Alternative B for the following reasons: Statement of Support for Alternative B 422 - Alternate B ensures a minimal environmental footprint by incorporating a combination of summer coastal barging, winter ice roads, aviation, and in-field roads. These features are essential to the project's safe and efficient operations. - Alternative B provides the safest, most environmentally responsible solution for developing Point Thomson's resources in a timely, cost-effective manner. - Through Alternative B, ExxonMobil will implement comprehensive mitigation measures to tundra, wildlife, aquatic resources, and subsistence activities. - The point Thomson project will provide wide-ranging benefits to Alaska in the form of new business opportunities, jobs, and revenues. - Direct benefits to the State of Alaska from Point Thomson include training and jobs for Alaskans, new revenues to the state and local governments, increased business activity and revenue for the private sector. - Approval of the Point Thomson Project, as proposed by Alternative B, is critical to developing this world-class resource and securing Alaska's energy future. I look forward to seeing construction movement by the end of 2012 or the beginning of 2013. This is essential to Alaska natural gas commercialization, extending the life of the Trans Alaska Pipeline and the future wellbeing of Alaska. 1	422 Comment noted; no action required.

Comment	Response
Davis, Cecile 0112_Mike.Huston_Ind **From:** Alcantra, Rosetta M. **Sent:** Tuesday, January 03, 2012 11:01 AM **To:** Davis, Cecile **Subject:** 122211 Mike Huston Comment PTDEIS **From:** Baij, Harry A Jr POA [mailto:Harry.A.Baij@usace.army.mil] **Sent:** Saturday, December 31, 2011 9:39 AM **To:** Mike **Cc:** Begier, Erin; Alcantra, Rosetta M. **Subject:** RE: Point Thompson ~ comments received Hi Mike, Thanks for your comments. They will be given full consideration and included in the administrative record. You may comment further until end-of-day Jan. 18, 2012. *Harry A. Baij Jr.* US Army Corps of Engineers, Alaska harry.a.baij@usace.army.mil Office: 907.753.2784 Cell: 907.350.5097 www.poa.usace.army.mil/reg **From:** Mike [mailto:mikeh@toteminc.com] **Sent:** Thursday, December 22, 2011 8:50 AM **To:** Baij, Harry A Jr POA **Subject:** Point Thompson Statement of Support for Project 423 Sir, as a life long Alaskan I am very aware of the potential for accidents and or misplaced development. The oil industry needs to be well regulated and I believe it is. Having said that the Point Thompson project is long overdue. Please accelerate this project as quickly as possible. Having looked I think alternatives B or C would be good, with B being preferred. Thanks Mike Huston 1	423 Comment noted; no action required.

Comment	Response
	424 Comment noted; no action required.

Davis, Cecile 0113_Kent.Petterson_Bus

From: Alcantra, Rosetta M.
Sent: Tuesday, January 03, 2012 11:00 AM
To: Davis, Cecile
Subject: 122211 Kent Patterson Comment PTDEIS

From: Baij, Harry A Jr POA [mailto:Harry.A.Baij@usace.army.mil]
Sent: Saturday, December 31, 2011 9:41 AM
To: Kent D. Patterson
Cc: Begier, Erin; Alcantra, Rosetta M.
Subject: RE: Point Thomson ~ comments received

Hi Kent,

Thanks much for all your comments. They will be given full consideration and included in the administrative record. You may comment further until end-of-day Jan. 18, 2012.

Harry A. Baij Jr.
US Army Corps of Engineers, Alaska
harry.a.baij@usace.army.mil
Office: 907.753.2784
Cell: 907.350.5097
www.poa.usace.army.mil/reg

From: Kent D. Patterson [mailto:KPatterson@PIBInsure.com]
Sent: Thursday, December 22, 2011 8:50 AM
To: Baij, Harry A Jr POA
Subject: Point Thomson

Statement of Support for Alternative B 424

As an Alaska resident and an Alaskan business man I am concerned about the future of the Alaska economy. It goes without saying that Alaska's economy is reliant on our natural resource development and Point Thomson is a major key to our future. Please consider the application for Option B as this and the development will help ensure the future of our businesses and our children's future.

Below are some comments for consideration:

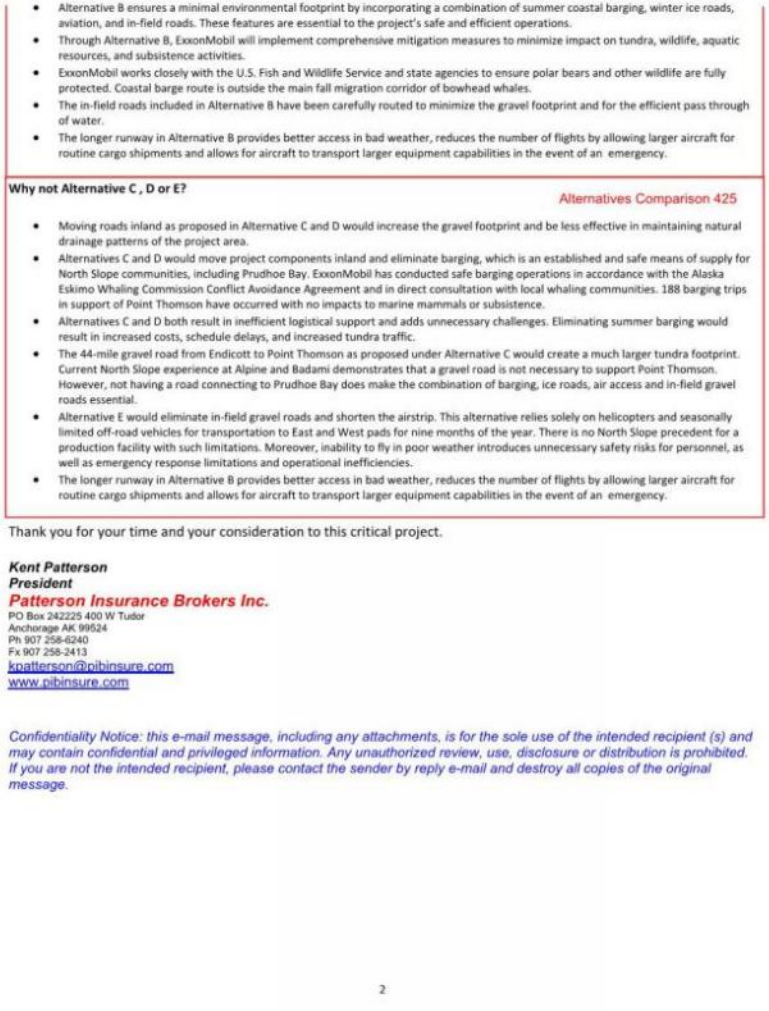
Why Pt Thomson Development is important

- The proposed project is important to the state of Alaska and to Alaskans.
- The Point Thomson project will provide wide-ranging benefits to Alaska in the form of new business opportunities, jobs, and revenues.
- Approval of the Point Thomson project, as proposed in Alternative B, is vital to the development of this world-class resource and North Slope gas commercialization.
- Direct benefits to the State of Alaska from Point Thomson include training and jobs for Alaskans, new revenues to the state and local governments, increased throughput for the Trans-Alaska oil pipeline, and increased business activity and revenue for the private sector.
- Point Thomson is a highly-technical project with high costs. Unnecessary requirements that provide very little, if any, incremental environmental benefits, should be avoided as to not compromise the economic viability of the project.

Why Alternative B?

- Of the design alternatives considered, Alternative B provides the safest, most environmentally-responsible solution for developing Point Thomson's resources.

1

Comment	Response
	425 The Corps will consider multiple factors, such as impacts to the environment identified during the NEPA process, the project purpose, practicability (as part of the 404[b][1] Guidelines analysis), public interest determination, and mitigation options, when making its final permit decision.

- Alternative B ensures a minimal environmental footprint by incorporating a combination of summer coastal barging, winter ice roads, aviation, and in-field roads. These features are essential to the project's safe and efficient operations.
- Through Alternative B, ExxonMobil will implement comprehensive mitigation measures to minimize impact on tundra, wildlife, aquatic resources, and subsistence activities.
- ExxonMobil works closely with the U.S. Fish and Wildlife Service and state agencies to ensure polar bears and other wildlife are fully protected. Coastal barge route is outside the main fall migration corridor of bowhead whales.
- The in-field roads included in Alternative B have been carefully routed to minimize the gravel footprint and for the efficient pass through of water.
- The longer runway in Alternative B provides better access in bad weather, reduces the number of flights by allowing larger aircraft for routine cargo shipments and allows for aircraft to transport larger equipment capabilities in the event of an emergency.

Why not Alternative C , D or E?

Alternatives Comparison 425

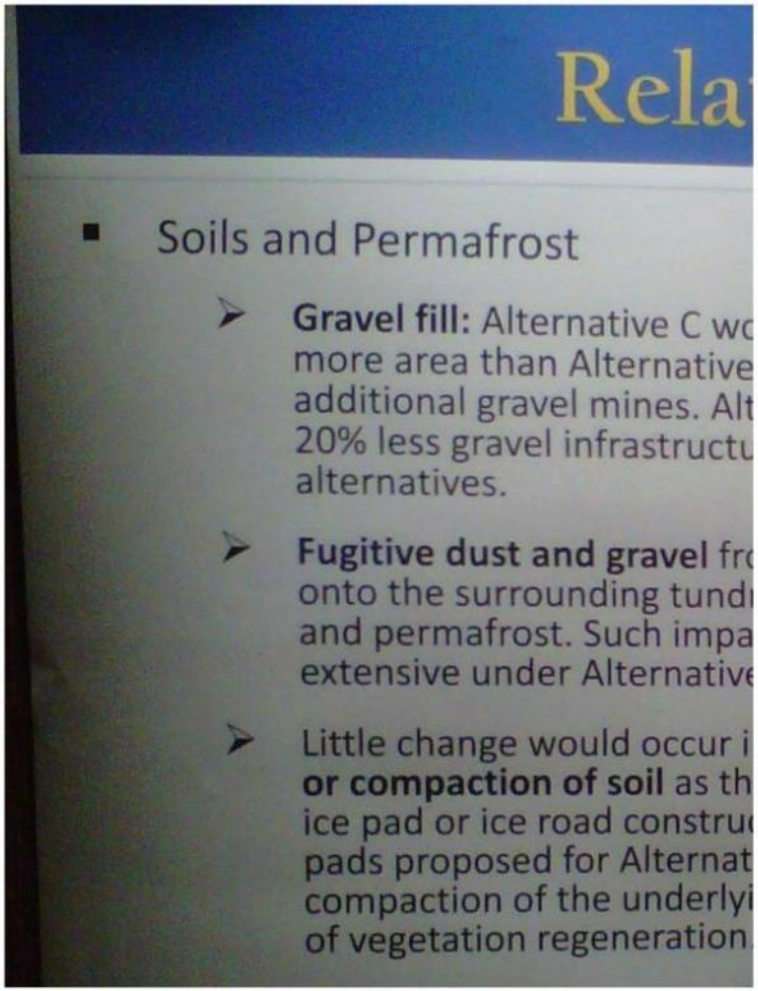
- Moving roads inland as proposed in Alternative C and D would increase the gravel footprint and be less effective in maintaining natural drainage patterns of the project area.
- Alternatives C and D would move project components inland and eliminate barging, which is an established and safe means of supply for North Slope communities, including Prudhoe Bay. ExxonMobil has conducted safe barging operations in accordance with the Alaska Eskimo Whaling Commission Conflict Avoidance Agreement and in direct consultation with local whaling communities. 188 barging trips in support of Point Thomson have occurred with no impacts to marine mammals or subsistence.
- Alternatives C and D both result in inefficient logistical support and adds unnecessary challenges. Eliminating summer barging would result in increased costs, schedule delays, and increased tundra traffic.
- The 44-mile gravel road from Endicott to Point Thomson as proposed under Alternative C would create a much larger tundra footprint. Current North Slope experience at Alpine and Badami demonstrates that a gravel road is not necessary to support Point Thomson. However, not having a road connecting to Prudhoe Bay does make the combination of barging, ice roads, air access and in-field gravel roads essential.
- Alternative E would eliminate in-field gravel roads and shorten the airstrip. This alternative relies solely on helicopters and seasonally limited off-road vehicles for transportation to East and West pads for nine months of the year. There is no North Slope precedent for a production facility with such limitations. Moreover, inability to fly in poor weather introduces unnecessary safety risks for personnel, as well as emergency response limitations and operational inefficiencies.
- The longer runway in Alternative B provides better access in bad weather, reduces the number of flights by allowing larger aircraft for routine cargo shipments and allows for aircraft to transport larger equipment capabilities in the event of an emergency.

Thank you for your time and your consideration to this critical project.

Kent Patterson
President
Patterson Insurance Brokers Inc.
PO Box 242225 400 W Tudor
Anchorage AK 99524
Ph 907 258-6240
Fx 907 258-2413
kpatterson@pibinsure.com
www.pibinsure.com

2

Comment	Response
Davis, Cecile 0114_Steve.Hickman_Ind **From:** Alcantra, Rosetta M. **Sent:** Tuesday, January 03, 2012 11:00 AM **To:** Davis, Cecile **Subject:** 122211 Steve Hickman Comment PTDEIS **From:** Baij, Harry A Jr POA [mailto:Harry.A.Baij@usace.army.mil] **Sent:** Saturday, December 31, 2011 9:47 AM **To:** Hickman, Steve **Cc:** Begier, Erin; Alcantra, Rosetta M. **Subject:** RE: Pt. Thomson ~ comments received Hi Steve, Thanks much for your comments and information regarding dust control. The comments will be given full consideration and included in the administrative record. You may comment further until end-of-day Jan. 18, 2012. *Harry A. Baij Jr.* US Army Corps of Engineers, Alaska harry.a.baij@usace.army.mil Office: 907.753.2784 Cell: 907.350.5097 www.poa.usace.army.mil/reg **From:** Hickman, Steve [mailto:shickman@polarsupply.com] **Sent:** Thursday, December 22, 2011 11:39 AM **To:** Baij, Harry A Jr POA **Subject:** Pt. Thomson Hi Harry, Statement of Support for Alternative B 426 I was at the EIS Public Comments meeting at the Loussac Library the other day. As a long time Alaskan I have watched the process of permitting this project as a concerned citizen and now a materials supplier for our local industries. I can say that without hesitation I have always been for developing this project. It appears to me that option B will have the least environmental impact of the choices. The time is now to move forward with this project. Alaska's oil and gas industry is one of the cleanest groups of this type around the world. Natural gas is one of the cleanest sources of energy. Our country needs projects like this to begin the business of rebuilding our economy. Consumerism alone will not do it. Please permit this project sooner rather than later. Without being too presumptuous maybe I can help you with your decision. I took this picture while I was at the library. 1	426 Comment noted; no action required.

Comment	Response
	

Comment	Response
Mitigation 427 It appears that one of the biggest causes for concern is the environment impact of fugitive dust from the road and pads. The good news is that this problem has already been addressed and evaluated by the Army Corps of Engineers. Polar Supply Company sells a product call EK-35. Please check the 2004 study, "Comprehensive Field Studies to Address Performance of Chemical Dust Palliatives" and the 2006 study, Evaluation of Chemical Dust Palliatives for Helipads", both by John Rushing with the U.S. Army Engineer Research and Development Center in Vicksburg. These studies show the effectiveness of palliatives in general. Additionally the EPA has certified in their Environmental Technology Verification (ETV) Report that EK-35 is environmentally safe and effective for controlling dust. EK-35 and it's companion product Envirokleen are the only products with this verification. Locally EK-35 has been used in Alaska for over 10 years. Reductions in fugitive dust have been dramatic. Our Alaska DOT uses some every year as part of it's maintenance schedule at local airports and roads. We have some interesting third party information proving how effective it is and how much more effective it is verses it's competitors. I would appreciate the opportunity to discuss this further. Please call me at your earliest convenience. Thanks, Steve POLAR SUPPLY COMPANY A Division of Spenard Builders Supply ***Steve Hickman*** **Sales** Polar Supply Company 300 E. 54th Ave. Anchorage, AK 99518 Phone: **907-244-1959** Fax: 907-561-1850 Email address: shickman@polarsupply.com Visit our website at www.polarsupply.com CONFIDENTIALITY NOTICE: This email may contain confidential and privileged material for the sole use of the intended recipient(s). Any review or use by others is strictly prohibited. Any distribution or disclosure by or to others is strictly prohibited. If you have received this communication in error, please notify the sender immediately by e-mail and delete the message and any file attachments from your computer. 3	427 The use of chemical dust palliatives will be considered as a possible mitigation measure to address fugitive dust.

Comment	Response
0115_Pamela.Miller_NGO Conservation's Northern Voice December 22, 2011 Not a Comment on EIS 756 Mr. Harry Baij Jr Department of the Army, U.S. Army Engineer District P.O. Box 6898 JBER, AK 99506-0898 E-mail: harry.a.baij@usace.army.mil Re: Public Comments on Point Thomson Project Draft EIS, and Permit Application POA-2001-1082-MI Dear Mr. Baij Jr., We wish to request a 15-day extension of the public comment period on ExxonMobil's Point Thomson Project Draft Environmental Impact Statement (" DEIS") and U.S. Army Corps of Engineers permit referenced above ("Permit"). The Northern Alaska Environmental Center ("Northern Center") is a regional non-profit conservation organization. This year we celebrated our 40th year of working to protect the environment of Arctic and Interior Alaska through education and advocacy. We request a comment period extension for the following reasons. First, the existing public review period overlaps with three significant federal holidays (Thanksgiving, Christmas, and New Year's), which are some of the busiest travel times of the year for Alaskan residents, including those living on the North Slope. The effectively shortened review period presents a burden for interested parties. Second, a comment period extension is necessary and appropriate due to the size and complexity of the DEIS and Permit as well as the magnitude of proposed impacts to the natural and human environment from this expansion of permanent roads, pipelines, and drill sites in the eastern North Slope. The project vicinity contains significant wetlands and fish and wildlife resources including endangered bowhead whales and threatened species including polar bear's critical habitats, subsistence resources vital to Inupiat residents and use areas for Kaktovik and Nuiqsut residents. Point Thomson Project has close proximity to the Arctic National Wildlife Refuge with facilities planned only 2 miles away from its border, and noise and other impacts that extend into the refuge. Third, the Point Thomson DEIS is a huge, complex document. It has 5,757 pages (main DEIS - 1,504 pages; Appendices - 4,253 pages). However, neither the project Summary nor DEIS documents were sent out to the Northern Center, nor apparently any other interested public who had provided scoping comments, unless requested. Unless one obtained a copy of the 46 page / 21 MB Executive Summary or DVD at the public meeting/hearings, it was necessary to download 36 different files from www.pointthomsondeis.com, 15 for the main DEIS (with the vital Environmental Consequences Chapter having 688 pages in over 88 MB) and 21 files for the Appendices (with the important Appendix K's Wetland Functional Analysis Map Book having 122 MB which takes a long time to download even at broadband speeds). We also note that Appendix A is the 576 page Final DA Permit Application submitted by Exxon dated October 26, 2011. This document was not made available to the public until DEIS release but is the document upon which the Permit will be based. A 501 (C) (3) NOT-FOR-PROFIT ORGANIZATION 830 COLLEGE ROAD, FAIRBANKS, ALASKA 99701 PHONE: (907) 452-5021 • FAX: (907) 452-3100 • WEB: http://www.northern.org	756 Comment noted; the comment period was extended.

Comment	Response
2 Fourth, the project and analyses are complex and involve a number of issues. Issues covered in the documents include wetlands, noise and other modeling, scientific information requiring expert review, and scores of complex Appendices that provide necessary reference materials for the alternatives and environmental impact analysis and Permit review. In particular, the Appendices are an interlocking part of the DEIS as they comprise essential references not otherwise available in published scientific or technical literature and with analysis particular to this project analysis. This DEIS also involves a complex analysis of mitigation measures for project impacts to wetlands functions and values and navigable waters of the United States. Because the project alternatives are presented as a "menu" approach to various ways to reduce impacts and the public was requested to evaluate which components from various alternatives would best avoid or reduce impacts, it is necessary to carefully examine the analyses for four different action alternatives as well as the supporting Appendices. This is the crux of the NEPA analysis and the Corps' decision, and the current short comment period burdens full public participation. Fifth, the Point Thomson review involves cumulative impacts analysis involving controversial projects including the nearby Sivalliq drilling proposed by Shell Oil Inc., new planned Beaufort Sea federal OCS leasing, and others. The DEIS explains that the Point Thomson Project infrastructure is related to OCS leases. *See, e.g.*, DEIS at 4-10. Public comment review periods for these offshore oil and gas projects overlapped with the Point Thompson project comment period, putting an additional burden on communities and organizations seeking to engage in the administrative process. In particular, the Bureau of Ocean Energy Management's OCS Oil and Gas Leasing Program: 2012-2017 Draft Programmatic EIS ("PDEIS") (76 FR 70156) released November 10, 2011 with comments due January 9. The BOEM PDEIS proposed a new lease sale in the Point Thomson project vicinity. Comments on Incidental Harassment Authorization under the Marine Mammal Protection Act for Shell's planned drilling in Camden Bay were due December 7, 2011. (76 FR 68974). In addition, comment periods on various authorizations for Shell's planned Chukchi Sea drilling fell within the Point Thompson project comment period. The overlap also affected participation in public hearings. In Fairbanks, public hearings for Point Thomson DEIS and the OCS Program 2012-2017 PEIS were on concurrent evenings, December 7 and 8, respectively. For our members living in other locations the burden was similar for the Point Thomson and OCS Program 2010-2017 PEIS with two hearings within the week: Kaktovik: December 12 and December 7; Nuiqsut: December 13 and December 6; and Barrow: December 15 and December 16, respectively. Further, no written (hard copy) documents, even a Summary, for the Point Thomson Project, were sent ahead of the hearings, so the meetings were a significant introduction to the EIS for the public who was able to participate during this busy time. We appreciate your consideration of a comment period extension of 15-days or more so that we and other members of the public have sufficient time for review warranted by the considerable analysis contained in the large and complex DEIS. Notification via email at pam@northern.org would be appreciated. Sincerely, Pamela A. Miller Pamela A. Miller Arctic Program Director	

Comment

0116_Carl.Portman_NGO

RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

December 21, 2011

Mr. Harry Baij
Department of the Army
U.S. Army Engineer District, Alaska
Regulatory Division
P.O. Box 6898
JBER, Alaska 99506-0898

Re: Point Thomson Project EIS

Dear Mr. Baij:

The Resource Development Council (RDC) is writing in support of Alternative B of the Point Thomson Draft Environmental Impact Statement (DEIS).

RDC is a statewide organization made up of all resource sectors, business associations, labor unions, Native corporations, tourism providers, local governments and individuals. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

RDC strongly supports the advancement of the Point Thomson project, which is essential to the success of the Alaska gas pipeline project – a major clean-energy priority of the Obama administration. Point Thomson contains an important component of gas volume to be moved by an Alaska gas pipeline and accounts for approximately 25 percent of known North Slope gas reserves. Statement of Support for Project 428

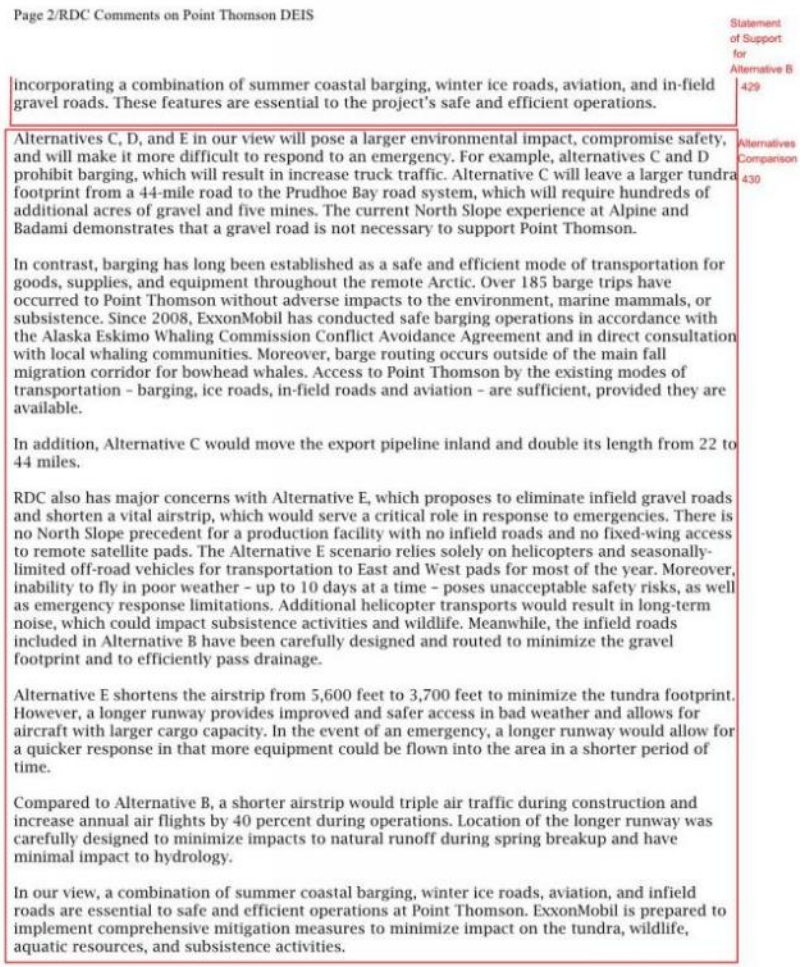
Development of Point Thomson resources will help meet domestic energy needs, reduce dependence on foreign sources, and increase throughput in TAPS, which is currently operating at one-third capacity. In addition, this multi-billion dollar project will provide hundreds of new jobs, additional tax revenues to local, state and federal governments, and help boost the private sector economy in Alaska and the Lower 48. In fact, Point Thomson development and subsequent production will serve as a lasting economic stimulus with virtually no cost to the federal government.

RDC urges the Corps to adopt Alternative B as the preferred alternative. Alternative B provides the safest, most environmentally-responsible option for Point Thomson's development. It minimizes the environmental footprint by

121 West Fireweed Lane, Suite 250, Anchorage, Alaska 99503-2035
Phone: 907-276-0700 Fax: 907-276-3887 Email: resources@akrdc.org Website: akrdc.org

Response

428 Comment noted; no action required.

Comment	Response
	429 Comment noted; no action required. 430 The Corps will consider multiple factors, such as impacts to the environment identified during the NEPA process, the project purpose, practicability (as part of the 404[b][1] Guidelines analysis), public interest determination, and mitigation options, when making its final permit decision.

Comment	Response
With regard to the nearby Arctic National Wildlife Refuge (ANWR), it is disconcerting that the DEIS places so much emphasis on the proposed project's proximity to the refuge and implies that the state land beneath Point Thomson should be managed as if they were part of the refuge. RDC joins the State of Alaska in expressing serious concern with the appropriateness of the DEIS assessing such impacts when the project is located on state lands designated for oil and gas development, well outside refuge boundaries. Moreover, a large portion of ANWR already includes over eight million acres designated as Wilderness and ANWR also encompasses vast ecosystems that are specifically designed to protect fish, wildlife, and wilderness values. Therefore, RDC is opposed to extending ANWR's reach beyond it boundaries. Arctic Refuge 431 With regard to polar bears, the Point Thomson project will not pose a threat to the survival of the species. Polar bear denning habitat is plentiful, widely distributed and undisturbed on the Beaufort Sea coastal plain. It is highly unlikely that denning habitat will become a limiting factor for polar bears, even when all foreseeable development activity is taken into account. We certainly do not see any significant impact from Point Thomson on critical habitat for polar bears. Moreover, ExxonMobil works closely with the U.S. Fish and Wildlife Service and state agencies to ensure polar bears and other wildlife are protected. There are extensive measures in place to minimize incidental encounters and protect bears and personnel, as well as surveys and Forward Looking Infrared Radar to identify and avoid dens. There are also project design and operational features to protect bears and humans. Marine Mammals 432 In conclusion, approval of the Point Thomson project as proposed by Alternative B is critical to the development of this world-class resource. The project will provide direct benefits to the State of Alaska and much-needed revenues to local, state and federal governments, as well as boost the private sector economy in Alaska. Sincerely, Carl Portman Deputy Director	431 Section 3.13, Land Use, Land Ownership, and Land Management, explicitly states that the Point Thomson project area is located on land owned and managed by the State of Alaska. NEPA requires analysis of impacts regardless of land ownership. The EIS includes a separate section on the Arctic Refuge due to its proximity to the project and the Thomson Sand Reservoir. 432 The Corps agrees that the proposed project would not pose a threat to the survival of polar bears as a species. However, project activities may affect individual polar bears, primarily through disturbance. The EIS evaluates these potential impacts. In addition, because polar bears are protected under the Endangered Species Act and Marine Mammal Protection Act, the Corps is consulting with the U.S. Fish and Wildlife Service to evaluate the potential for polar bear "take" under these federal regulations.

Comment	Response
0117_Anna.Fairclough_SGOV **Alaska State Legislature** **Representative Anna Fairclough – House District 17** December 28, 2011 Mr. Hank Baij Project Manager U.S. Army Corps of Engineers Alaska District, Regulatory Division P.O. Box 6898 JBER, Alaska 99506-0898 Dear Mr. Baij, Statement of Support for Alternative B 433 Please accept this letter as comment for the draft Environmental Impact Statement for the Point Thomson Project on the North Slope of Alaska. I am supportive of the Alternative B proposal. This proposal is the safest, most environmentally friendly-responsible solution for developing the resources at Point Thomson. Alternative B would incorporate a combination of summer coastal barges, winter ice roads, aviation, and in-field roads, minimizing the environmental footprint. The barge route proposed under Alternative B is outside the main fall migration corridor of the bowhead whales. The in-field roads have been carefully routed to minimize the gravel footprint and all for efficient pass through of water. The longer runway will provide better access in bad weather, reduce the number of flights into the area by allowing larger aircraft to haul large cargo shipments and larger equipment in the event of an emergency. All of this combined are essential to the safe and efficient operation of the project. This project is very important to the state of Alaska, our people, and the United States of America. This project will provide our state and nation with a wide range of benefits, from new business opportunities, to jobs and increased tax revenues. Development of Point Thomson will bring this world-class resource to market and provide security and stability for our state and country. The development and approval of the Point Thomson- Alternative B project will help secure our energy future and provide opportunity for decades to come. Thank you for your consideration of my comments. I will continue to monitor the progress and success of this project. I look forward to a favorable outcome that will benefit the state of Alaska, the United States of American, and our citizens. Sincerely, Anna L. Fairclough Representative Anna Fairclough Alaska State Legislature House of Representatives *Session*: Alaska State Capitol • Juneau, AK 99801 • 907-465-3777 • Fax 907-465-2819 *Interim*: 10928 Eagle River Road, Suite 238 • Eagle River, AK 99577 • 907-694-8944 • Fax 907-694-8945 Representative_Anna_Fairclough@legis.state.ak.us	433 Comment noted; no action required.

Comment	Response
Page 1 of 2 0118_Deborah.Cranswick_FGOV **From:** Alcantra, Rosetta M. **Sent:** Tuesday, January 03, 2012 10:55 AM **To:** Davis, Cecile **Subject:** FW: informal note - information for Point Thomson EIS ~ message received **From:** Baij, Harry A Jr POA [mailto:Harry.A.Baij@usace.army.mil] **Sent:** Saturday, December 31, 2011 10:30 AM **To:** Cranswick, Deborah **Cc:** Begier, Erin; Alcantra, Rosetta M.; Gallagher, Tim; Allwright, Michael C. **Subject:** RE: informal note - information for Point Thomson EIS ~ message received Hi Deborah, Thank you very much for your note and references to supplement the DEIS. If these scientific papers were not used, I will ask they be reviewed. Your message, with no formal comment, will be included in the administrative record. You may provide comments until end-of-day Jan. 18, 2012. I am interested in speaking to you or staff regarding the possible cumulative impacts of off-shore Federal leases in the Point Thomson area. Please contact me when you get a chance. Erin, please send Ms. Cranswick one more set of the NEPA document CDs and 2 computer simulation CDs. *Harry A. Baij Jr.* US Army Corps of Engineers, Alaska harry.a.baij@usace.army.mil Office: 907.753.2784 Cell: 907.350.5097 www.poa.usace.army.mil/reg **From:** Cranswick, Deborah [mailto:Deborah.Cranswick@boem.gov] **Sent:** Friday, December 30, 2011 9:59 AM **To:** Baij, Harry A Jr POA **Subject:** informal note - informaion for Point Thomson EIS Hi. I am the Chief of the Environmental Analysis Section I, Alaska Region, Bureau of Ocean Energy Management (BOEM, formerly MMS, then BOEMRE). My section was asked to review the EIS. Staff commented that the EIS was well done and complete. The BOEM Alaska Region has no formal or official comment. This note is not a comment on the DEIS, although it is appropriate to include in the record. I offer the following information on our agency name change and recent studies FYI. We had another name change October 1, 2011. BOEMRE was divided into 2 agencies: the Bureau of Ocean Energy Management (BOEM) and the Bureau of Safety and Environmental Enforcement (BSEE). The correct agency continuing the Bowhead Whale Aerial Survey Program (BWASP) surveys and studies (cited in Section 3.11.2) is now BOEM. Editorial 434 BOEM (and its predecessors) funded the following studies that you might consider to supplement the studies file://C:\Documents and Settings\cedavis\Desktop\Point Thomson\Draft EIS Comments\FW... 1/4/2012	434 The name has been corrected in the Final EIS.

Comment	Response
	435 The Corps reviewed each of the studies listed in this comment. Thorsteinson et al. 1991 provides study area-specific information that has been incorporated into the Final EIS (see Section 3.12.3 and Figure 3.12-1). Gradinger and Bluhm 2005 provides information on the importance of sea ice to algae and invertebrates in the shallow waters of the Beaufort Sea and the affect of sedimentation on productivity. Reference to this study has been added to the discussion of invertebrates and other trophic levels in Section 3.12.7, Invertebrates and Other Lower Trophic Levels, of the Final EIS. Murphy et al. 2007 provides a synthesis of existing publications and reports on arctic cisco and includes the perspective of local knowledge for the Colville River and importance of the species for subsistence harvest. Because the Draft EIS discusses and references studies synthesized in Murphy et al. 2007, the 2007 report was not incorporated into the Final EIS. The potential impacts to subsistence harvest of arctic cisco from the Point Thomson Project is discussed in Section 5.22. Logerwell et al. 2008 is an important current study of offshore marine fish; however, it was not incorporated into the Final EIS because its focus is offshore, while the potential impacts to marine fish from the Point Thomson Project would mostly be in nearshore areas and because the study area for the report was far west of the Point Thomson Project study area (Cape Simpson to Cape Halkett).

Comment	Response
Davis, Cecile 0119_Michelle.Holland_Ind **Sent:** Thursday, December 29, 2011 11:28 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Michelle Holland Email: Michelle@hollandroofingco.com Address: 8716 Elmore Rd City: Anchorage State: AK Zip: 99507 Contact Phone: 908-344-9911 Statement of Support for Alternative B 436 Comments: After reviewing the information I feel that of the five design alternatives considered, Alternative B provides the safest, most environmentally-responsible solution for developing Point Thomson's resources in a timely, cost-effective manner. I support Alternative B.	436 Comment noted; no action required.

Comment	Response
Davis, Cecile 0120_Mark.Symonds_Ind **Sent:** Thursday, December 29, 2011 7:40 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: mark symonds Email: msymonds@sencoak.com Contact me through email: Yes Address: 877 e dowling rd City: anchorage State: AK Zip: 99518 Contact Phone: 1-907-561-2175 Add me to mailing list: Yes Statement of Support for Project 437 Comments: i am all for this project it will bring jobs to us . i also would like to know who is the contractor that is of record i know the bid was in oct 2011 thank you for your time	437 Comment noted; no action required.
Davis, Cecile 0121_Christina.Hollibone_Ind **Sent:** Saturday, December 24, 2011 1:40 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Christina Hollibone Email: hollibonec@gmail.com Contact me through email: Yes Address: PO Box 84261 City: Fairbanks State: AK Zip: 99708 Contact Phone: Add me to mailing list: Yes Alternatives Comparison 438 Comments: I support Alternate C. This seems to be the most cost effective to be able to truck supplies from Prudhoe Bay to Point Thompson. Airfreight is too costly and not as consistently available in this area. At one million dollars per mile for an ice road that is ONLY good for winter this is not the ideal solution either. Building a road that can be traveled on all year round is the ideal as loads can be consistently delivered all year round.	438 The Corps will consider multiple factors, such as impacts to the environment identified during the NEPA process, the project purpose, practicability (as part of the 404[b][1] Guidelines analysis), public interest determination, and mitigation options, when making its final permit decision.
Davis, Cecile 0122_Judy.McClean_Ind **Sent:** Friday, December 23, 2011 10:08 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Judy McClelan Email: pugslie@gmail.com Contact me through email: Yes Address: 3513 McKenzie Drive City: Anchorage State: AK Zip: 99517 Contact Phone: 907-227-1776 Statement of Support for Alternative B 439 Comments: I am in support of approval of the Point Thomson Project as proposed by Alternative B. This project would create much needed jobs in our state and will help ensure Alaska and the rest of the Country's energy future.	439 Comment noted; no action required.

Comment	Response
Davis, Cecile 0123_Jodi.Dingle_Ind **Sent:** Wednesday, January 04, 2012 9:14 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Jodi Dingle Email: jodi.dingle@ch2m.com Address: PO Box 241863 City: Anchorage State: AK Zip: 99524 Contact Phone: Statement of Support for Alternative B 440 Comments: I attended the public comment session held in December in Anchorage at Loussac Library and support approval of Alternative B.	440 Comment noted; no action required.

Comment	Response
Davis, Cecile 0124_Elke.Joos_Ind **Sent:** Wednesday, January 04, 2012 9:00 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Elke Joos Email: ejoos@conamco.com Contact me through email: Yes Address: 2327 E 86th Court City: Anchorage State: AK Zip: 99507 Contact Phone: 907-830-0823 Statement of Support for Alternative B 441 Comments: I am a 39 year resident of Alaska, born in Palmer Alaska, and I support of plan B! Statement of Support for Project 442 The responsible development of potentially immense oil and gas deposits in the Arctic would significantly boost Alaska's economy, extend the life of the trans-Alaska oil pipeline, improve the economic viability of the proposed natural gas pipeline from the North Slope to the Lower 48, reduce America's reliance on foreign energy, create tens of thousands of new jobs and generate hundreds of billions of dollars in federal, state, and local government revenues. According to a new study by Northern Economics and the University of Alaska, an annual average of 54,700 new jobs would be created and sustained through the year 2057 from the Alaska OCS, with 68,600 during production and 91,500 at peak employment. A total of $145 billion in new payroll would be paid to employees through the year 2057, including $63 billion to employees in Alaska and $82 billion to employees in the rest of the U.S. A total of $193 billion in government revenue would be generated through the year 2057 if oil averages $65 a barrel, with $167 billion to the Federal government, $15 billion to the State of Alaska, $4 billion to local Alaska governments, and $6.5 billion to other state governments. Government revenue would be much higher with higher oil prices. In the Arctic, industry has invested significant resources to develop comprehensive response plans in the event of an oil spill. In Alaska, Shell currently maintains a highly specialized fleet and specialized containment equipment, as well as a large workforce of highly trained people. Deepwater wells are far more technically complex than the shallow-water, low-pressure conditions in the Beaufort and Chukchi Seas. This provides a greater margin of safety in Alaska. Even so, robust well control and oil spill prevention systems have been enhanced with learnings from the Deepwater Horizon tragedy. 1	441 Comment noted; no action required. 442 Comment noted; no action required.

Comment	Response
There has never been a blowout in the Alaska OCS or the Canadian Arctic. Thirty wells have been drilled in the Beaufort and five in the Chukchi – all without incident. These wells were drilled in the 1980s, utilizing older technology. The North Slope and the offshore are now perhaps the most studied energy basins in America. The federal government has spent more than $300 million on studies in Alaska and in the past decade the agency has funded over 250 studies here, with the majority of those focused on the Beaufort and Chukchi Seas. Access to Alaska's OCS resources may be a key element in the economic feasibility of the proposed natural gas pipeline from the North Slope to the Lower 48, one of President Obama's top energy priorities. Additional gas reserves beyond those already discovered are needed to make the project economic. Elke Joos	
Davis, Cecile 0125_Scott.Marler_Ind **Sent:** Wednesday, January 04, 2012 8:47 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Scott A. Marler Email: scott.marler@evergreenak.com Contact me through email: Yes Address: 1936 Merrill Field Drive City: Anchorage State: AK Zip: 99501 Contact Phone: 907-257-1525 Add me to mailing list: Yes Comments: Statement of Support for Alternative B 443 I support Alternative B for the further development of Pt. Thompson.	443 Comment noted; no action required.

Comment	Response
Davis, Cecile 0126_Shell.Schwenn_Ind **Sent:** Tuesday, January 03, 2012 3:01 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Shell Schwenn Email: cosmonullr@gmail.com Address: 8244 Seacliff City: Anchorage State: AK Zip: 99502 Contact Phone: Statement of Support for Alternative B 444 Comments: Please chose Alternative B as it appears the most environmentally sensitive option for development of Pt Thomson.	444 Comment noted; no action required.
Davis, Cecile 0127_John.Ellsworth_Ind **Sent:** Tuesday, January 03, 2012 2:57 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: John Ellsworth Email: john.ellsworth@alaska.com Address: PO Box 224889 City: Anchorage State: AK Zip: 99522 Contact Phone: Statement of Support for Alternative B 445 Comments: • Alternative B ensures a minimal environmental footprint by incorporating a combination of summer coastal barging, winter ice roads, aviation, and in-field roads. These features are essential to the project's safe and efficient operations. • Through Alternative B, ExxonMobil will implement comprehensive mitigation measures to minimize impact on tundra, wildlife, aquatic resources, and subsistence activities. • ExxonMobil works closely with the U.S. Fish and Wildlife Service and state agencies to ensure polar bears and other wildlife are fully protected. Coastal barge route is outside the main fall migration corridor of bowhead whales. • The in-field roads included in Alternative B have been carefully routed to minimize the gravel footprint and for the efficient pass through of water. • The longer runway in Alternative B provides better access in bad weather, reduces the number of flights by allowing larger aircraft for routine cargo shipments and allows for aircraft to transport larger equipment capabilities in the event of an emergency.	445 Comment noted; no action required.

Comment	Response
Davis, Cecile 0128_Mike.Murphy_Ind **Sent:** Tuesday, January 03, 2012 2:28 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Mike Murphy Email: mike@eaglesafety.net Contact me through email: Yes Address: 5849 Old Seward Hwy. City: Anchorage State: AK Zip: 99518 Contact Phone: 907-677-6513 Add me to mailing list: Yes Statement of Support for Alternative B 446 Comments: After close review of all of the proposed alternatives I would like to go on record as being in support of EIS Draft Alternative B. For the reasons stated Alternative B is most definitely the best choice.	446 Comment noted; no action required.
Davis, Cecile 0129_Lucas.Olive_Ind **Sent:** Tuesday, January 03, 2012 1:05 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Lucas Olive Email: lucaso@nanuq-afc.com Address: P.O.Box 224889 City: Anchorage State: AK Zip: 99522 Contact Phone: Statement of Support for Alternative B 447 Comments: I support alternative B to help continue to develop our States natural resources.	447 Comment noted; no action required.
Davis, Cecile 0130_David.Chaput_Ind **Sent:** Tuesday, January 03, 2012 12:05 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: David Chaput Email: dave.chaput@alaska.com Address: 6250 S. Airpark Place City: Anchorage State: AK Zip: 99502 Contact Phone: 907-562-5303 Add me to mailing list: Yes Statement of Support for Alternative B 448 Comments: I am in support of the Point Thomson Development Alternative B. I choose this alternative because it provides the safest and most environmentally friendly approach to developing these reserves.	448 Comment noted; no action required.

Comment	Response
Davis, Cecile 0131_Linda.Brown_Ind **Sent:** Monday, January 02, 2012 11:05 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Lou (Linda) S. Brown Email: jonmiller@acsalaska.net Contact me through email: Yes Address: 2630 Home Run City: Fairbanks State: AK Zip: 99709 Contact Phone: 907 479-5629 Comments: Hank Baij, Project Manager U.S. Army Corps of Engineers AK District, Regulatory Division P.O. Box 6898 JBER, Alaska 99506-0898 January 3, 2012 Dear Mr. Baij, Thank you for the opportunity to comment on the Point Thomson Project EIS. I also appreciate the extension of the comment period. I attended one of the public meetings on the Draft EIS on December 7 in Fairbanks and had the opportunity to become somewhat familiar with the scope of the project. Based on that meeting, I would like to make the following comments: Alternatives Comparison 449 • In my view, the east pad of the project will be located too close to the Staines River channel of the Canning River. The Staines is only about two miles from the Canning which, as you know, is the western boundary of the Arctic National Wildlife Refuge. Images contained on the website show caribou in quite high concentrations on the Canning Delta and I believe development so close to the river will disturb their migrations and, therefore, have a negative impact on the purposes for which the Refuge was created. Given the directional drilling capabilities the proposed project will have, I believe that this easternmost pad could be and should be eliminated. Pursuing this option would reduce impacts on wildlife while still meeting the project's purpose and need. Alternatives Comparison 450 • Secondly, I think that the pads as currently described, are too close to the shore and I am concerned that activity so close to the water will disturb both birds and mammals. Moreover, it seems likely that encounters between people and animals such as polar bears could end in poor outcomes for one or both. Indeed, Appendix M of the EIS shows that at least eight confirmed bear dens are found in the Point Thomson area and that a significant amount of bear denning habitat also surrounds and penetrates the proposed development site.To some extent, encounters with bears and other negative impacts on birds and animals could be reduced by moving the pads back from the shore. 1	449 Through the NEPA process, the public interest review, and the 404(b)(1) Guidelines analysis, the Corps will take many factors into consideration, including minimizing impacts, before making a final decision. The Corps is not looking at an alternative that eliminates the East Pad. This alternative (Concept 6) was eliminated from detailed consideration for not meeting the purpose and need of the project. The language in Section 2.2.4.2 has been supplemented to make this decision clearer. Without the ability to drill wells from the vicinity of the proposed East Pad, the Applicant would not be able to access eastern resources that have already been identified in approximately one-third of the Thomson Sand Reservoir. A well from the Central Pad would have to reach more than 30,000 feet, which is technologically infeasible. The State of Alaska independently verified that a 13,000-foot horizontal distance is the present limit of extended-reach drilling. Reduced access to the eastern portion of the reservoir would limit the Applicant's ability to continue evaluation and delineation activities, including fully delineating the eastern edge of the reservoir, testing connectivity with the central portion of the reservoir, and fully evaluating the Thomson Sand oil rim and Brookian Group sandstones hydrocarbons. 450 Inland and coastal pad locations each have trade-offs and environmental impacts. The Corps will consider multiple factors, such as impacts to the environment (e.g., to birds and mammals) identified during the NEPA process, the project purpose, practicability (as part of the 404[b][1] Guidelines analysis), public interest determination, and mitigation options, when making its final permit decision.

Comment	Response
Alternatives Development 451 • Melting permafrost due to global climate change could increase erosion which, in turn could have significant deleterious impacts on the pad foundations. Shifting of the pads could result in spillage of oil or other chemicals and fluids used in the exploration and development of the fields. I urge the Army Corps to require additional protections in the form of, for example, thicker foundation pads and containment structures to guard against such eventualities. As the Corps is no doubt aware, the question is not if a spill will occur, but when. It is within the Corps power to ensure such accidents are minimized in both number and scale. Thank you for considering my thoughts on this matter. Sincerely, Lou (Linda) S. Brown 2630 Home Run Fairbanks, AK 99709	451 North Slope operating procedures set the minimum thicknesses for gravel pads, the Corps does not have jurisdiction over that aspect of the project.
Davis, Cecile 0132_Brett.Ard_Ind **Sent:** Friday, December 30, 2011 7:50 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Brett Ard Email: pennywise_68@hotmail.com Contact me through email: Yes Address: 16510 Centerfield Drive #D7 City: Eagle River State: AK Zip: 99577 Contact Phone: Statement of Support for Alternative B 452 Comments: After reviewing the provided information, I feel that "Alternative B" is the most efficient course of action to progress the development of resources on the North Slope of Alaska. By developing Pt Thomson, we can ensure that more jobs are created for Alaskans and our state economy gets a much needed boost.	452 Comment noted; no action required.

Comment	Response
Davis, Cecile 0133_Chris.Ledgerwood_Ind **Sent:** Friday, December 30, 2011 7:32 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Chris Ledgerwood Email: ledgerwc@yahoo.com Address: 19107 Nunivak Circle City: Eagle River State: AK Zip: 99577 Contact Phone: Statement of Support for Alternative B 453 Comments: I am promoting Alternative B for the Point Thomson development. Alternative B is the most environmentally friendly option to safely access these trapped oil and gas resources in this field. This project is important to Alaskans and it has my full support.	453 Comment noted; no action required.

Comment	Response
0134_Aves.Thompson_APM_Bus POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Statement of Support for Alternative B 92 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska Good evening. My name is Aves Thompson. I'm the Executive Director of the Alaska Trucking Association. The Alaska Trucking Association is a 52-year-old Alaska trade association, comprised of nearly 200 member companies, representing diverse trucking operations in Alaska. In 2010, trucking in Alaska employed over 14,500 persons and paid annual wages of more than $720,000. I'm here today to talk about the Point Thomson Project and the Draft EIS. Of the several design alternatives for Point Thomson, for the Point Thomson project, Alternative B provides the best approach to developing Point Thomson. Alternative B provides for summer coastal barging, winter ice roads, landing strips and in-field roads, all of which are environmentally sound methods of transportation. Approval of the Point Thomson Project, as proposed in Alternative B, is vital to provide direct benefits to the state of Alaska in the form of jobs for Alaskans, throughput for the Trans Alaska oil pipeline, new revenues for the state and local governments, and increased business activity and revenue for the private sector. On behalf of the of Alaska Trucking Association's nearly 200 members, I urge you to move forward with Alternative B. Thank you.	92 Comment noted; no action required.

Comment	Response
0135_Bill.Binford_APM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Statement in Support of Alternative B 93 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska BILL BINFORD: For the record, Bill Binford, 222 E. 7th Avenue, Anchorage. Please accept my testimony in support of Alternative B for the Point Thomson Project. This project is a very important source of energy and jobs for Alaska and the United States. Currently, the United States is importing $2 billion worth of energy products per day. $2 billion per day, think about it; that's a huge number. This project is important for the state and for this nation and can help to turn that tide. It is critical that we move to develop our own resources in this country, relying less on foreign energy, which comes at a high financial and political price. In reviewing the documents, it is apparently that ExxonMobil has done their homework and has prepared a thorough analysis and taken the necessary steps to ensure a safe and environmentally responsible project. I urge you to accept Alternative B and to move ahead with this project in a timely manner. Our state and our nation need it. Thank you.	93 Comment noted; no action required.

Comment	Response
0136_Brad.Osborne_APM_Bus POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska BRAD OSBORNE: Thank you. Statement of Support for Alternative B 95 My name is Brad Osborne; I'm the President of NANA Oilfield Services Company, or NOSI, and an Inupiaq Eskimo. NOSI is a subsidiary of NANA Development Corporation, which was formed following the Alaska Native Claims Settlement Act four decades ago. NANA is owned by 12,700 Inupiaq shareholders, whose roots are in Northwest Alaska. I take pride in being a NANA shareholder and having the opportunity to work for my Alaska Native corporation. I'm here, on behalf of NOSI, to support Alternative B of the Corps' Draft Environmental Impact Statement. This option provides the smallest project footprint and greatest environmental protection. The combination of barging, ice roads and aviation will allow safe, flexible operations on a year-round basis. Barging is part of life in the 90 percent of Alaska that is off the road system. It is normally the safest, most reliable, most cost-effective way to deliver goods. Barge traffic in Alternative B is outside the main travel path of the bowhead whales. NOSI has worked with ExxonMobil and the other producers for years. We appreciate the efforts they take to ensure polar bears, whales and other wildlife are protected. We've been particularly interested in the polar bear program at Point Thomson, which includes wellsite bear monitors, building exit bear cages and implementing the Polar Bear and Wildlife Interaction Plan. It has been very effective, and we know the company will continue that	95 Comment noted; no action required.

Comment	Response
vigilance when production begins. As a shareholder and a manager at NANA, I want to work to provide opportunities for people from my home and my region. I take NANA's mission -- to improve the quality of life for our people by maximizing economic growth, and protecting and enhancing our lands -- seriously. I am here tonight because I believe these things will happen when Point Thomson is developed. Point Thomson development will provide jobs and economic opportunity for all Alaskans. These benefits include new revenues to state and local governments, increased throughput for the Trans Alaska oil pipeline, and increased business activity and revenue for the private sector. Alternative B provides the safest, most environmentally responsible solution for developing Point Thomson's resources. The field contains an estimated eight trillon cubic feet of natural gas, 500 million barrels of condensate and -- perhaps -- more than 600 barrels of oil. It is time to get this resource out of the ground and help move Alaska's economy forward. Thank you for this opportunity.	

Comment	Response
0137_Bryan.Clemenz_APM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska BRYAN CLEMENZ: Thank you. Statement of Support for Alternative B 98 Hello, my name is Bryan Clemenz. I also work at CH2M HILL. I spent a little time with some folks, in one of our conference rooms earlier today, taking a look at all of the facts that are out there and some of the information that's already been presented. I think it's been a remarkable effort by all parties supporting the EIS development: HDR, the leading agency, Army Corps, and ExxonMobil, as well as others, were conscientious, deliberate, thoughtful and thorough in the development of the alternatives being presented. Phenomenal simulations, by the way. I think that was great. HANK BAIJ: Thank you. BRYAN CLEMENZ: I'd like to be more specific with my comments and say that after careful review and consideration of all the alternatives, I believe that Alternative B would provide the most balanced approach to the development of the project. I believe that that maximizes the full potential of the project for all Alaskans and Americans, I think it establishes safe and reliable operations, while minimizing risks that could otherwise result in an event impacting persons, environment or both, due to fact. And logistics are pretty significant with a project like this, and some of those alternatives, if you kind of look a little bit deeper and underneath the surface, you'll find that that may impose some additional risks. And I believe that also it minimizes the impact to the environment, gravel	98 Comment noted; no action required.

Comment	Response
field, wetlands, given all the alternatives that are out there. I encourage that everybody here, whether you're giving verbal testimony or written testimony, to take a closer look at the facts, and as I said earlier, try to get those facts in there. I think there's a lot of information out there, so I encourage everybody to do so. Thank you.	

Comment	Response
0138_Carl.Portman_APM_NGO POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska Statement of Support for Alternative B 103 CARL PORTMAN: Good evening. My name is Carl Portman. I'm Department Director of the Resource Development Council. RDC is a statewide organization made up of all resource sectors, including business associations, labor unions, Native corporations, tourism providers, local government and individuals. RDC's purpose is to encourage a strong diversified sector in Alaska and extend the state's economic base through the responsible development of our natural resources. RDC strongly supports the advancement of the Point Thomson Project, which is essential to the throughput of the Alaska gas pipeline project, a major clean-energy priority through the Obama Administration. Point Thomson contains an important component of gas volume to be moved by an Alaska gas pipeline and accounts for approximately 25 percent of the North Slope gas reserves. Development of Point Thomson resources will help meet domestic energy needs, reduce dependence on foreign sources and increase throughput in TAPS, which is currently operating at one-third capacity. In addition, this multi-billion-dollar project will help provide hundreds of new jobs, additional tax revenues for local, state and federal governments, and help boost the private-sector economy in Alaska and in the Lower 48. In fact, Point Thomson development and subsequent production will serve as a lasting	103 Comment noted; no action required.

Comment	Response
economic stimulus at virtually no cost to the federal government. RDC urges the Corps to adopt Alternative B as the preferred alternative. Alternative B provides the safest, most environmentally responsible option for Point Thomson development. As we have heard this evening, Alternative B clearly minimizes the impacts and environmental footprint by utilizing coastal barging, winter ice roads, aviation and in-field gravel roads. With regard to polar bears, this project will not pose a threat to the survival of the species. Polar bear denning habitat is plentiful, widely distributed and undisturbed on the Beaufort Sea Coastal Plain. It is highly unlikely that denning habitat will become a limiting factor for polar bears even when all foreseeable development activity is taken into account. We certainly do not see any significant impact from Point Thomson on critical habitat for polar. RDC appreciates the opportunity to express its support for the Point Thomson Project and urges the Corps to move forward with Alternative B. RDC will submit more detailed comments on the various alternatives before next month's deadline. Thank you.	

Comment	Response
0139_Charisse.Millett_APM_IND POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska Statement of Support for Alternative B 105 CHARISSE MILLETT: Is it better if I come down? Thank you for the opportunity to testify. My name is Charisse Millett, for the record, and I am an Alaska legislator; I represent House District 30. I'm here representing myself. I'm a lifelong Alaska, an Alaska Native. I have three children and one grandchild. I'm testifying tonight to ensure a bright, vibrant future for them. Resource development in Alaska is what will provide that. A strong economy in Alaska is vital to their future. Throughput is declining at a rate that is depleting energy supplies to Alaskans and to the U.S. Alaska's development of oil and gas could be and will be a part of a secure energy supply for the U.S. and for Alaska for years to come. That is why I support Point Thomson development and the prospects of future production. Alternative B is the route that I would like the EIS to approve. Alternative B ensures minimal environmental footprint by incorporating a combination of summer coastal barging, winter ice roads, aviation and in-field roads. These features are essential to the project's safe and efficient operations. Point Thomson Project will provide wide-ranging benefits to Alaska in the form of new businesses, opportunities, jobs and revenues. Approval of the Point Thomson Project, as proposed in Alternative B, is vital to the development of this world-class resource in the North Slope and gas commercialization.	105 Comment noted; no action required.

Comment	Response
Direct benefits to the State of Alaska from Point Thomson include training for jobs for Alaskans, new revenues to the state and local governments, increased throughput for the Trans Alaska oil pipeline and increased business activity for the revenue of the private sector. I urge you to approve the EIS and move to a Record of Decision. Thank you.	

Comment	Response
0140_Dave.Cruz_APM_Bus POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska Statement of Support for Alternative B 108 DAVE CRUZ: My name is Dave Cruz. I'm CEO of Cruz Companies in Alaska. We are in resource development in Alaska and the Lower 48. I'm here in support of Alternative B: Alaska needs this project, America needs this project; B is for me. Thank you.	108 Comment noted; no action required.

Comment	Response
0141_David.Tetreau_APM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska Statement in Support of Alternative B 110 DAVID TETREAU: For the record, my name is David Tetreau, a graduate of East Anchorage High, a long-time Alaska resident, a long-time resident of Kaktovik. I didn't prepare a written statement; I just came off the Slope today, so I'm doing this off the cuff. I would like to add my support for Option B to the Point Thomson Project. I read the EIS statement. I think that it was well thought out. You guys did your research. I appreciate that. I know my village appreciates that. I'd like to testify to the economic added benefits of this project, to not only Alaskans but our local villages in the surrounding area. I've seen some of the young people perk up and grow, due to Exxon giving them an opportunity to work as subcontractors on the project. They were proud to be out there helping. I was proud, also, to be part of a group that came up there in support of Exxon, as a subcontractor working with them. I was also very encouraged by their commitment to listen to village concerns, as well as solicit information that was passed on year to year for people up there. They listened to what we had to say. And their commitment to the environment is far and above any of the other companies that I've worked with on the Slope in my years of service up there. So I just wanted to come out tonight and show my support. And that's all I have.	110 Comment noted; no action required.

Comment	Response
0142_Eric.Dompeling_APM_Bus POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska Statement of Support for Alternative B 111 ERIC DOMPELING: I think I'll just do it from here, if you don't mind. HANK BAIJ: Sure. THE WITNESS: Good evening. My name is Eric Dompeling. I am a manager for Solsten XP and represent that company here this evening. I'm also a past president of the Alaska Support Industry Alliance. I'm here to support Alternative B proposal as put forth by the ExxonMobil organization as the safest and most environmental-responsibility solution for developing Point Thomson's resources. This project, to take into consideration, minimizes the environmental footprint and also minimizes the impact on the tundra, the wildlife, the aquatic resources, as well as minimizes the impact to subsistence activities. But just as importantly, by incorporating summer coastal barging and the use of winter ice roads, aviation, where necessary for safety reasons, and most efficient use of in-field roads, all these things contribute to safe and efficient operations, which, at the end of the day, should be the point of environmental impact reviews. During the 40-plus years I've lived and worked in Alaska, I have witnessed a significant improvement in the ability of Alaskans to provide for their families. Since the discovery of Prudhoe Bay, in 1968, to the construction of the Trans Alaska Pipeline the projects like the Point Thomson development, many more Alaskans have been able to	111 Comment noted; no action required.

Comment	Response
find good paying, year-round jobs. Ladies and gentlemen, this project is important to the State of Alaska and to Alaskans, because the Point Thomson Project will provide new business opportunities and jobs and revenue. Approval of the Point Thomson Project, as proposed in Alternative B, is vital to the development of this world-class resource and North Slope gas commercialization. Direct benefits to the State of Alaska from Point Thomson include training and jobs for Alaskans and new revenues for the state and to the boroughs. It means increased throughput, for the Trans Alaska Pipeline, and increased business activity and revenue for the private sector. And one more thing: Point Thomson is a highly technical project, even by global standards, and will associate a high cost to extract the resource. Any unnecessary requirement, that provides no incremental benefits but simply adds cost, should be avoided in order to maintain a viable project. The Point Thomson Project, 30 years in the making, likely will provide jobs for Alaskans for the next 30 years. I'd also like to state I support Joe Balash's comments. I wish I had the ability to reread what he said, because it certainly is significant to the State of Alaska that we maintain and we develop these lands. Thank you.	

Comment	Response
0143_Floyd.Damron_APM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska Statement of Support for Alternative B 114 FLOYD DAMRON: Good evening, and thank you for having me here. I'd like to state my name for the record. It's Floyd Damron. I've lived in Alaska for the past 46 years, and I know exactly what it's like to live here prior to having our resource development on the North Slope, and it's much better for me, my family and all of us when the situation is resource development on the Slope. I would like to say I support Alternative B for the Point Thomson Project as the most environmentally responsible way to develop that resource. I'm an East High graduate, University of Alaska Fairbanks graduate; I did quite a bit of research, in the Prudhoe Bay and Deadhorse area, on water resources and water supply. I had the privilege recently of being the manager and leading a project to develop a temporary water supply for the Point Thomson Project, and I can tell you that every step of the way Exxon had an environmental component and was very concerned about each and every issue in the project so that the water resource would be developed most responsibly. I'm an engineer with CH2M HILL, but I'm speaking on behalf of myself tonight, and I believe that development of Alternative B will result in very good jobs for those of us in Alaska; for ourselves, ultimately for family members, our kids and others. Thank you very much for letting us have this opportunity tonight.	114 Comment noted; no action required.

Comment	Response
0144_Gawain.Brumfield_APM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska Statement of Support for Alternative B 119 GAWAIN BRUMFIELD: My name is Gawain Brumfield. I arrived here in Alaska a week ago this -- a year ago this week. After a year in Alaska, I'd say this is my favorite place I've ever lived. I spent the last 12 years living all over the world, and I'd like to speak to that a little bit. Can you hear me okay? Being in the oil and gas industry, I mostly lived in areas where oil and gas are under production and development, and I can say there's no safer, more environmentally friendly place in the world to develop natural resources in 21st Century America. For example, I have lived in places there were refineries. Anything out of the bottom half of the vacuum tower was considered economically undesirable. It was used as unfiltered fuel oils or mix in the roads, or simply dumped. And as long as the United States is getting about 60 percent of their oil from overseas and 20, 15 to 20 percent of their natural gas, we're contributing to that problem. That's why I very strongly support Option B for this project. And I agree with one of the gentleman who spoke earlier. The other options just simply don't make any sense: A much larger environmental footprint; as well -- increased drilling distance just adds unnecessary risk, as well. So I support Option B. Thank you.	119 Comment noted; no action required.

Comment	Response
0145_Ivalu.Eric.Fox_APM_Bus POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska IVALU ERIC FOX: Thank you. Statement of Support for Alternative B 121 Good evening. Thank you for the chance to present my views and the views of NANA Management Services, or NMS, on the U.S. Army Corps of Engineers Draft Environmental Impact Statement for ExxonMobil's Point Thomson natural gas condensate development project. I'm Ivalu Eric Fox, Vice President of Operations for Camp Services at NMS, a NANA Development Corporation subsidiary. NANA Development Corporation is the business arm of NANA Regional Corporation, owned by 12,700 Inupiaq people who originated in Northwest Alaska. I am proud to call myself one of them. I started working for NANA as a security officer almost 20 years ago on the North Slope. My entire professional career has been with NANA, and I take great pride in being an owner, a shareholder, of my employer. Production at Point Thomson will help my company and Alaska. Approval of the Point Thomson Project, as proposed by Alternative B, is critical to developing this valuable resource and helping to secure Alaska's energy future. Of the design alternatives considered, Alternative B provides the safest and best way forward. The in-field roads included in Alternative B have been carefully laid out to create the smallest possible gravel footprint and the most efficient pass-through of water.	121 Comment noted; no action required.

Comment	Response
Alternative C and D would increase the footprint and increase the difficulty in maintaining natural drainage patterns of the project area. They would move project components inland and eliminate barging, which is an established and safe means of supply for North Slope communities, including Prudhoe Bay. ExxonMobil has conducted safe barging operations in accordance with the Alaska Eskimo Whaling Commission Conflict Avoidance Agreement and in direct consultation with local whaling communities. I have a personal and professional stake in this decision and in seeing Point Thomson developed. In simple terms, when there's oil and gas development, several of NANA's companies can compete for this work. When that happens, NANA can help the Alaska economy grow with private sector jobs and move forward in our mission to provide opportunities and employment to our shareholders, the majority of whom live in Northwest Alaska. NMS sees the direct impact from the growth, or lack of growth, of the oil and gas industry in Alaska. With about 2,400 employees, NMS is among the ten largest employers in the state of Alaska. Between a third and a half of our revenues come from providing services to the oil and gas industry. A major part of our mission is to provide employment and career advancement for NANA shareholders. I am an example of NMS's commitment in this area. Camp Services, my division, is more than 20 percent NANA shareholders and 90 percent Alaska hire. Approving Alternative B will move production	

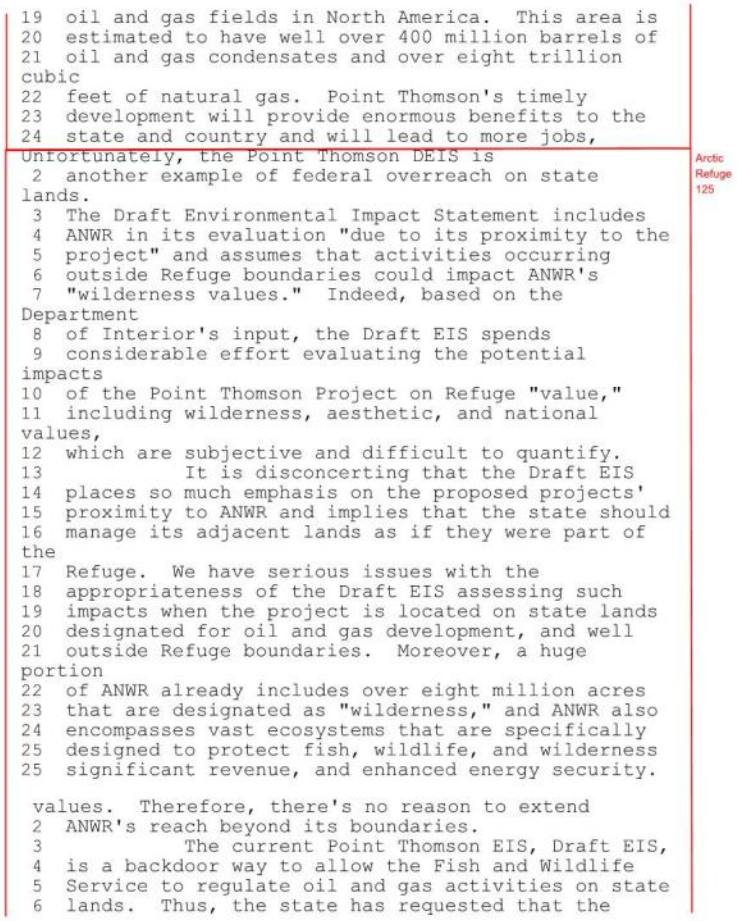
Comment	Response
at Point Thomson in a step closer to production that is good for Alaska, NANA and NMS. Thank you for this opportunity.	

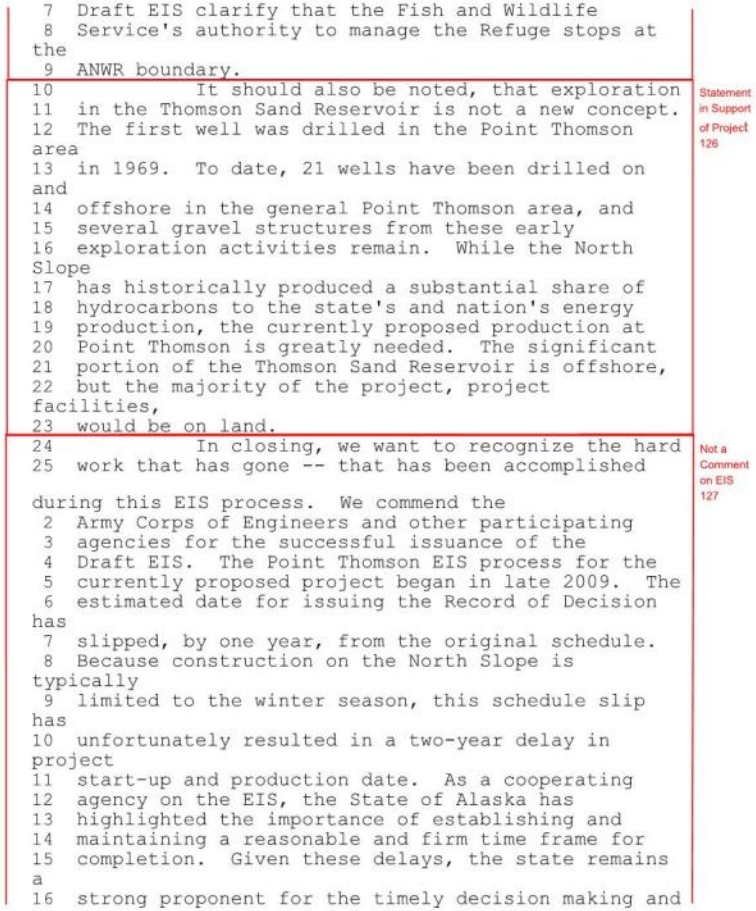
Comment	Response
0146_Jason.Brune_AMP_NGO POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska JASON BRUNE: Thank you, Hank. Statement in Support of Alternative B 122 For the record, my name is Jason Brune. I serve as the President of the Consumer Energy Alliance. I also serve as the co-chair of Governor Parnell's Resources, Energy and Environmental Transition Team. As part of our transition team reports to the Governor, we indicated that filling the pipeline was our number-one priority, and as stated in the report, quote, "Without sufficient new investment Alaska's future ability to provide basic service to its citizens will be impaired." Point Thomson is imperative. The precedence it sets is imperative to the state of Alaska. We must do everything we can to reach the one-million-barrel goal that the Governor has set. With respect to ExxonMobil's activities and proposal, I want to endorse Alternative B. First and foremost, the minimized footprint will, of course, continue to set the standard of Alaska doing it the best in the world, also doing it the safest. No one does it is better than Alaskans do it, and, indeed, in Alaska and in the world, no one does it better than Exxon does. My wife works for the Alyeska Pipeline, and she continues to say that Exxon sets the standard for the industry in the safety and environmental footprint standards that they have. I've also seen this firsthand, having come up here originally as part of a major disaster, the Exxon Valdez oil spill. I've seen the culture shift in Exxon firsthand, and I've seen -- and I've proudly seen how amazing the	122 Comment noted; no action required.

Comment	Response
company has become in focusing on the environment and focusing on protection of the environment. I think there's no better company to do this project than ExxonMobil. In addition, I think it's imperative to note that the amount of information that we know about polar bears today is in large part thanks to the oil industry. Were it not for the oil industry, we wouldn't know and have the funding to do much of the research that's been done on polar bears and other mammals up on the North Slope. Indeed, we've seen the polar bear population triple since the sixties. I sure hope that there will not be any restrictions put on this project because of the polar bear population which are thriving both in size and in number and in distribution. I hope that -- and I think one of the positive impacts of this project, hopefully will -- it will ultimately be to ANWR being opened. This is also imperative to the one-million-barrel goal. And finally, I want to applaud the Obama Administration today. Two years after the decision on CD-5 finally coming to resolution, building a bridge in NPR-A shouldn't have stopped the project for two years. I sure hope the Corps keeps that in mind when they approve Alternative B in an expeditious manner. Thank you.	

Comment	Response
0147_Jim.Gilbert_APM_Bus POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska Statement of Support for Alternative B 123 JIM GILBERT: Thank you for the opportunity to testify on behalf of the Point Thomson Draft Environmental Impact Statement. My name is Jim Gilbert, and I'm President and testifying on behalf of my company, Udelhoven Oilfield Systems Services. Our 800-plus employees provide technical expertise to the oil and gas industry in Alaska, the Gulf of Mexico, Tbilisi, Georgia, and Arakini, Turkey. First and foremost, we want a Point Thomson Project; sooner, rather than later, and with the greatest long-term benefits for the State of Alaska, Alaskan workers, Alaskan businesses and all Alaskans. North Slope gas commercialization holds one of the keys to Alaska's future. Of the design alternatives considered, Alternative B provides the safest, most environmentally responsible solution for developing Point Thomson's resources. Alternative B ensures a minimum environmental footprint by incorporating a combination of summer coastal barging, winter ice roads, aviation, and in-field roads. These features are essential to the projects safe and efficient operations. The Point Thomson Project will provide wide-ranging benefits to Alaska in the form of new business opportunities, jobs and revenues. Thank you very much.	123 Comment noted; no action required.

Comment	Response
0148_Joe.Balash_APM_SGOV POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska JOE BALASH: For the record, my name is Joe Balash, Deputy Commissioner of the Department of Natural Resources. The State of Alaska is pleased that the Point Thomson EIS was issued for public comment. The Point Thomson Project's overall project is to produce liquid hydrocarbons from the Point Thomson Sand Reservoir and further evaluate and delineate the reservoir and evaluate the Brookian Group sandstones. The state continues to fully support production at Point Thomson, which would help offset current declines in the North Slope production and maintain efficiency of the Trans Alaska Pipeline System. Over the past 20 years, North Slope production has steadily declined and is now currently producing about 640,000 barrels per year -- per day, per year. In the face of steadily declining production, Governor Parnell maintains an ambitious goal for Alaska and the country to increase TAPS throughput to one million barrels per day within a decade. Bringing Point Thomson development online will certainly help the state achieve this goal. The fields development is also a likely and necessary prerequisite for a large-diameter natural gas pipeline from the North Slope. For this reason, the state is keenly interested in ensuring that ExxonMobil can diligently and timely move forward with development of this fuel. The Point Thomson field is on state lands near the 1002 Area of the Arctic National Wildlife Refuge. The field is one of the largest undeveloped Statement of Support for Project 124	124 Comment noted; no action required.

Comment	Response
 19 oil and gas fields in North America. This area is 20 estimated to have well over 400 million barrels of 21 oil and gas condensates and over eight trillion cubic 22 feet of natural gas. Point Thomson's timely 23 development will provide enormous benefits to the 24 state and country and will lead to more jobs, Unfortunately, the Point Thomson DEIS is 2 another example of federal overreach on state lands. 3 The Draft Environmental Impact Statement includes 4 ANWR in its evaluation "due to its proximity to the 5 project" and assumes that activities occurring 6 outside Refuge boundaries could impact ANWR's 7 "wilderness values." Indeed, based on the Department 8 of Interior's input, the Draft EIS spends 9 considerable effort evaluating the potential impacts 10 of the Point Thomson Project on Refuge "value," 11 including wilderness, aesthetic, and national values, 12 which are subjective and difficult to quantify. 13 It is disconcerting that the Draft EIS 14 places so much emphasis on the proposed projects' 15 proximity to ANWR and implies that the state should 16 manage its adjacent lands as if they were part of the 17 Refuge. We have serious issues with the 18 appropriateness of the Draft EIS assessing such 19 impacts when the project is located on state lands 20 designated for oil and gas development, and well 21 outside Refuge boundaries. Moreover, a huge portion 22 of ANWR already includes over eight million acres 23 that are designated as "wilderness," and ANWR also 24 encompasses vast ecosystems that are specifically 25 designed to protect fish, wildlife, and wilderness 25 significant revenue, and enhanced energy security. values. Therefore, there's no reason to extend 2 ANWR's reach beyond its boundaries. 3 The current Point Thomson EIS, Draft EIS, 4 is a backdoor way to allow the Fish and Wildlife 5 Service to regulate oil and gas activities on state 6 lands. Thus, the state has requested that the Arctic Refuge 125	125 Under the National Environmental Policy Act, federal agencies must disclose all impacts of an undertaking, whether those impacts occur on federal land or on land owned by others. The EIS makes clear that refuge management authority does not extend beyond refuge boundaries. However, impacts in several categories extend across the boundaries and into the Refuge, including noise and visual impacts. The lead federal agency is obligated to disclose the impacts.

Comment	Response
 7 Draft EIS clarify that the Fish and Wildlife 8 Service's authority to manage the Refuge stops at the 9 ANWR boundary. 10 It should also be noted, that exploration 11 in the Thomson Sand Reservoir is not a new concept. 12 The first well was drilled in the Point Thomson area 13 in 1969. To date, 21 wells have been drilled on and 14 offshore in the general Point Thomson area, and 15 several gravel structures from these early 16 exploration activities remain. While the North Slope 17 has historically produced a substantial share of 18 hydrocarbons to the state's and nation's energy 19 production, the currently proposed production at 20 Point Thomson is greatly needed. The significant 21 portion of the Thomson Sand Reservoir is offshore, 22 but the majority of the project, project facilities, 23 would be on land. 24 In closing, we want to recognize the hard 25 work that has gone -- that has been accomplished during this EIS process. We commend the 2 Army Corps of Engineers and other participating 3 agencies for the successful issuance of the 4 Draft EIS. The Point Thomson EIS process for the 5 currently proposed project began in late 2009. The 6 estimated date for issuing the Record of Decision has 7 slipped, by one year, from the original schedule. 8 Because construction on the North Slope is typically 9 limited to the winter season, this schedule slip has 10 unfortunately resulted in a two-year delay in project 11 start-up and production date. As a cooperating 12 agency on the EIS, the State of Alaska has 13 highlighted the importance of establishing and 14 maintaining a reasonable and firm time frame for 15 completion. Given these delays, the state remains a 16 strong proponent for the timely decision making and Statement in Support of Project 126 Not a Comment on EIS 127	126 Comment noted; no action required. 127 Comment noted.

Comment	Response
17 collaborative working relationship among cooperating 18 agencies throughout the remainder of the process as 19 well as throughout the potential permitting of this 20 project. We look forward to continue working 21 together with these federal agencies to see continued 22 success in completing the EIS phase for the Point 23 Thomson Project. 24 Thank you.	

Comment	Response
0149_Joe.Mathis_APM_Bus POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska Statement of Support for Alternative B 128 I'm Joe Mathis, Vice President of External Affairs for NANA Development Corporation. Thank you for the opportunity to talk to you today about the U.S. Army Corps of Engineers' draft environmental impact statement on ExxonMobil's Point Thomson natural gas condensate project. I urge you to approve Alternative B, which allows Point Thomson to be developed in a safe, environmentally responsible manner. Once in production, this development will initially add 10,000 barrels of condensates to the Trans Alaska Pipeline each day, helping to sustain an industry that is currently in decline. The other alternatives introduce unnecessary risk, increase the footprint and pose, logistically, challenges that make no sense. I am very familiar with the North Slope, having worked for NANA in several management positions on the North Slope for 17 years and, in Anchorage, over 25 years. I was the founding president of the Alaska Support Industry Alliance back in 1979 and am a current board member of the Alliance. I also keenly understand how critical the oil and gas industry is to the economic health of my community and to my state. Alternative C and D will unnecessarily add cost, lead to poor logistical support and significantly increase the footprint. Summer barging is a proven, safe way to deliver supplies to the communities and industrial operations across the North Slope. Eliminating barging makes no sense and would mean construction of more than a 40-mile road	128 Comment noted; no action required.

Comment	Response
from Endicott to Point Thomson. A road will only grow costs, take more time and significantly increase impact to the tundra. However, not having a road makes the combination of barging, ice roads and air access and in-field gravel roads essential. Under Alternative E, the airstrip could only accommodate helicopters, and in-field roads would be eliminated. This alternative introduces unnecessary safety risks for personnel, creates significant barriers to emergency response and adds to operational inefficiencies. There is no North Slope precedence for a production facility with such dangerous limitations. I am proud of the work we do at NANA. We have a good record of providing employment and opportunities for Alaskans. We see Point Thomson as a way to continue that. NANA has a long history of serving the oil patch in Alaska. We started working on the North Slope not long after the passage of the Alaska Native Claims Settlement Act. NANA Oilfield Services has been in business providing services to the oil industry for about four decades, and NANA Management Services, or NMS, has been serving the industry for over 30 years. And more recently, companies like NANA WorleyParsons have designed and engineered new North Slope facilities, and NANA Construction is building modules for use in Alaska's oil fields. We have recently purchased the Gulf Coast-based Grand Isle Shipyard, or GIS. This is a significant, strategic investment for NANA that highlights our belief in the future of the petroleum industry in Alaska. NANA wants to help Alaska, particularly rural Alaska, see, safe, the benefits, efficient development and production in the oil patch. We see developing Point Thomson as a part of our future and	

Comment	Response
a way to help create more employment opportunities for our shareholders and Alaskans living in the Northwest Alaska. Please approve Alternative B to the U.S. Corps of Engineers' Draft Environmental Impact Statement on ExxonMobil's Point Thomson natural gas condensate development project. Thank you for your attention and you listening.	

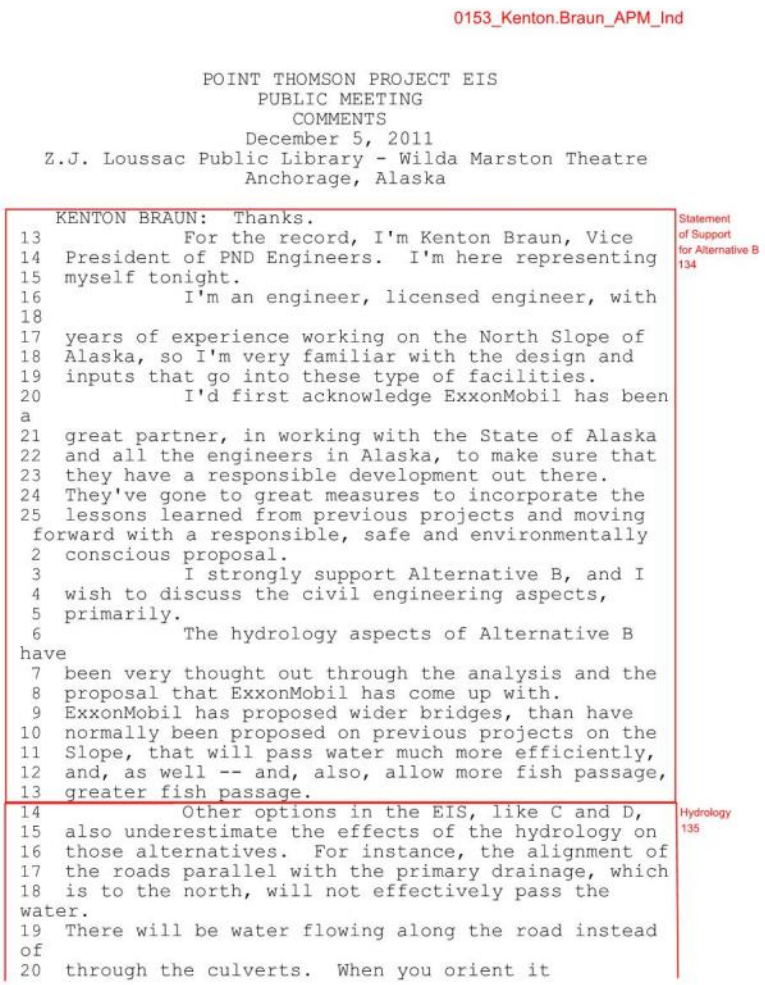
Comment	Response
0150_John.Shively_APM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, AlaskaStatement of Support for Alternative B 129 JOHN SHIVELY: Thank you very much. For the record, my name is John Shively. I'm here to support Alternative B of the Draft EIS. I'm a former commissioner in the Department of Natural Resources. I served in the late '90s. I certainly would like to associate myself with the comments of Joe Balash. Back in the '90s, we were anxious to see if Point Thomson -- if Point Thomson could get going. We had a number of discussions with Exxon, so we're pleased to see the progress that has been made, even if the Draft EIS process has slowed that down some. It's certainly a project that is good for Alaska. It's on state lands. And there are a couple things that Joe said that really struck home with me. One was the delay in the process. We seem, in this country, to be able to delay almost any project, I think, in the process, and that's maybe one of the reasons why our national economy is in such bad shape. Also, it concerns me that people could sit and interpret something that's in the EIS, and that the Fish and Wildlife Service plan to expand its authority beyond the boundaries congress set for it. And lastly I just would like to remind people that the high energy prices, that are driven by the fact that we don't develop our own resources, have an impact on the very poorest Americans, including Alaskans, and in the case of Alaskans, it's	129 Comment noted; no action required.

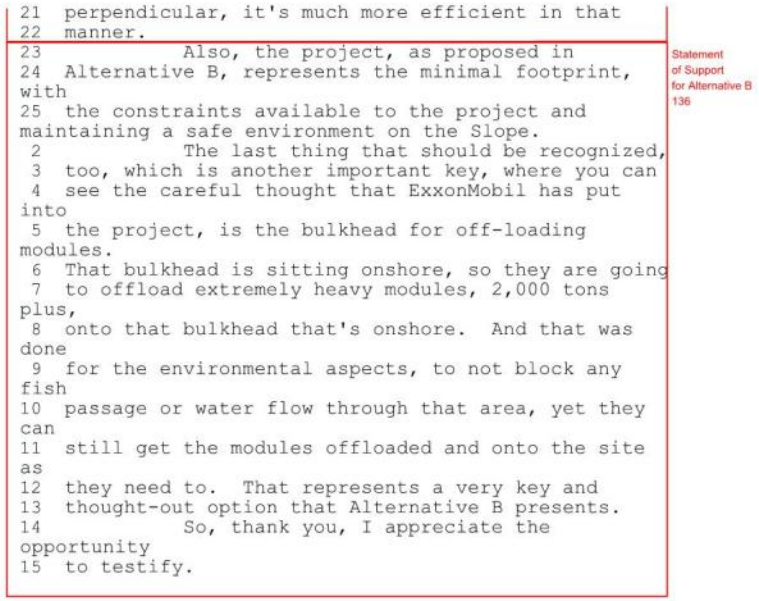
Comment	Response
primarily people in rural Alaska who are paying the very highest energy prices in the country. Although this project may not resolve all those problems, getting this project developed and having the potential to get gas off the North Slope for use in our state would be a positive step forward. Thank you very much.	

Comment	Response
0151_John.Sturgeon_APM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska JOHN STURGEON: Thank you. Statement of Support for Alternative B 130 My name is John Sturgeon. Good evening. I'm a 41-year resident of Alaska. I have worked in the Alaska forest products industry during that entire time. I have two grown children and three grandchildren that live in Alaska. I want a future for Alaska that will have an economy that will provide the same great opportunities I had during those same 42 years. Alaska and America need the resources that Point Thomson field contains. I support Alternative B, because it is the safest, most environmentally responsible solution for developing the Point Thomson area. Thank you for the opportunity to speak tonight.	130 Comment noted; no action required.

Comment	Response
0152_Kate.Williams_APM_NGO POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, AlaskaStatement of Support for Alternative B 133 KATE WILLIAMS: My name is Kate Williams, and I'm the Regulatory Affairs Representative for the Alaska Oil and Gas Association. We appreciate the opportunity to provide testimony tonight on the Draft EIS for the Point Thomson Project. AOGA strongly supports Alternative B, the proposed project. The proposed project is the safest, most environmentally sound and economic option of the action alternatives and should be selected as the preferred alternative in the Final EIS. Alternatives C, D and E all prohibit or require project components which are more harmful to the environment than the proposed project. For example, Alternative C and D prohibit barging, which would necessitate a substantial increase in truck traffic. Instead of barging, Alternative C proposes a 44-mile gravel road from Point Thomson to the Prudhoe Bay road system. This would require an additional 336 acres of gravel and five mines, and create a much large tundra footprint. On the contrary, barging has long been established as a safe means of delivering supplies to coastal communities throughout the state. To date, approximately 188 barge trips have taken place in support of the Point Thomson Project with no adverse impacts to marine mammals or subsistence use. Should the project move forward, barging operation would continue to be conducted in accordance with the Alaska Eskimo Whaling Commission Conflict Avoidance Agreement and in direct consultation with local whaling communities. Alternative E would eliminate in-field gravel roads and shorten the project's proposed	133 Comment noted; no action required.

Comment	Response
22 airstrip by almost 2,000 feet, instead relying solely 23 on helicopters and seasonally-limited off-road 24 vehicles for transportation. This would create 25 unnecessary safety risks as well as emergency response limitations and operational inefficiencies. 2 Compared to Alternative B, the shorter airstrip would 3 triple fixed-wing air traffic during construction and 4 increase air traffic by 40 percent during operations. 5 The in-field roads associated with the proposed 6 project have been routed to minimize the gravel 7 footprint and maintain natural drainage patterns; no 8 new streams would be created, nor would existing 9 streams be eliminated, and bridges would be 10 constructed to ensure anadromous fish passage. In 11 comparison, moving roads inland, as proposed in 12 Alternatives C and D, would increase the project's 13 gravel footprint by 30 percent and have greater 14 impacts on drainage patterns and fish passage. 15 Point Thomson represents approximately 25 16 percent of known North Slope gas resources, holding 17 an estimated eight trillion cubic feet of gas and 200 18 million barrels of gas condensate. Since 2008 alone, 19 ExxonMobil has contracted with 170 Alaska-based 20 firms, investing almost $700 million in Alaska 21 businesses and employment opportunities. Should the 22 proposed project move forward, revenues will flow -- 23 revenues will flow throughout the state. The Point 24 Thomson resources are also a vital component of any 25 effort to commercialize Alaska's gas. Given the proposed project's minimal impacts to the tundra, 2 wildlife, aquatic resources, and subsistence 3 activities, and the benefits the project would 4 provide the State and Alaskans, AOGA urges the Corps 5 to select Alternative B in the Final EIS. 6 Thank you.	

Comment	Response
	134 Comment noted; no action required. 135 Roads oriented parallel to the flow of water would not need to "pass the water" as they would not restrict the flow of water. Portions of the infield gravel roads for Alternatives C and D would be oriented largely perpendicular to flow and some portions would be oriented largely parallel to flow. Where the roads are not parallel to flow, culverts would be used to allow the water to pass through. The number and placement of the culverts would be optimized to prevent or minimize ponding, similar to Alternative B.

Comment	Response
	136 Comment noted; no action required.

perpendicular, it's much more efficient in that manner.

Also, the project, as proposed in Alternative B, represents the minimal footprint, with the constraints available to the project and maintaining a safe environment on the Slope.

The last thing that should be recognized, too, which is another important key, where you can see the careful thought that ExxonMobil has put into the project, is the bulkhead for off-loading modules. That bulkhead is sitting onshore, so they are going to offload extremely heavy modules, 2,000 tons plus, onto that bulkhead that's onshore. And that was done for the environmental aspects, to not block any fish passage or water flow through that area, yet they can still get the modules offloaded and onto the site as they need to. That represents a very key and thought-out option that Alternative B presents.

So, thank you, I appreciate the opportunity to testify.

Statement of Support for Alternative B 136

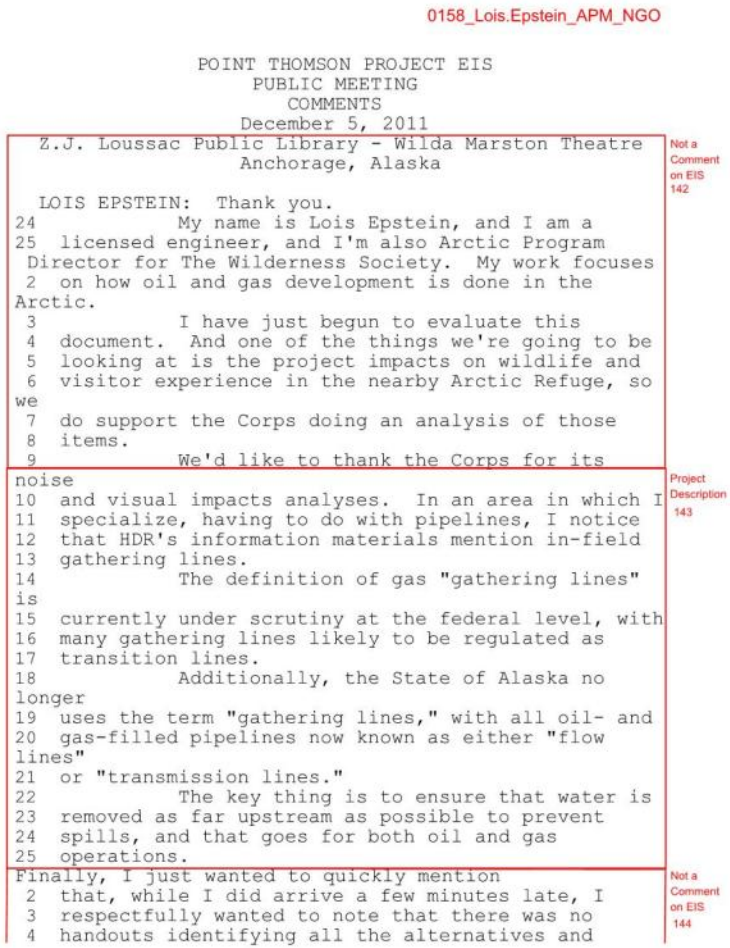
Comment	Response
0154_Keith.Silver_APM_Bus POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska KEITH SILVER: Good evening. Statement of Support for Alternative B 138 My name is Keith Silver. I'm a sole proprietor, owner of the Silver Agency and Allstate Agency, and I have no direct ties to ExxonMobil or any of the other contractors. However, I am in favor of Alternative B and the comments made by Deputy Commissioner Balash. In a deference to the people following me, I'm going to give up the mic. HANK BAIJ: Thank you, Keith.	138 Comment noted; no action required.

Comment	Response
0155_Larry.Houle_APM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska Statement of Support for Alternative B 139 LARRY HOULE: That's how it's pronounced, too. Thank you. I thank HDR and the Corps for this opportunity to comment. My name is Larry Houle, and I am employed by RIM Architects. We are a 25-year-old Alaskan company with offices in Guam, Hawaii and California. We have about 90 employees. I would point out that we don't have any clients in the oil industry, at this time, but we do believe in projects like this, and we think that the oil industry in Alaska represents the best practices in responsible development. A long-time Alaskan, I worked on the Alaska Pipeline; helped put me through college, and I believe projects like Point Thomson will help future generations through college, as well, and enhance their skill sets. I'd like to voice support for Alternative B. We think it's the safest and most environmentally responsible access to Point Thomson. The in-field road plan clearly minimizes the tundra footprint. The longer runway provides the safest - - a safer and more practical access for larger routine cargo transportation. I think, on a personal note, my sons and I, over these last couple decades, have spent literally weeks in the Brooks Range and on the Arctic Slope, so we have an understanding and appreciation of the delicate environment up there. We also think the	139 Comment noted; no action required.

Comment	Response
19 TAPS and Alaska North Slope development represents 20 probably the best practices in the world for 21 responsible development and environmental protection. 22 Therefore, we support Alternative B.	
0156_Leslie.Simmons_APM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska LESLIE SIMMONS: Yes, that's me. Statement of Support for Project 140 10 I'm Leslie F. Simmons. I'm currently a 11 University of Alaska Ph.D. student, and in the past, 12 I worked with the Point Thomson Project as both a 13 regulator and the regulated. 14 The Point Thomson Project does well, with 15 environmental safety and health projects and 16 compliance, and I support the Point Thomson Project 17 for development and moving forward. 18 Thank you. 19	140 Comment noted; no action required.

Comment	Response
0157_Lindsay.Williams_APM_SGOV POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska LINDSAY WILLIAMS: Good evening. Statement of Support for Alternative B 141 My name is Lindsay Williams. I am legislative staff for State Senator Cathy Giessel. Senator Giessel regrets being unable to attend tonight. She is a nurse practitioner and volunteers at a free clinic for homeless citizens on Monday evenings. Senator Giessel's comments on the Point Thomson Project Draft Environmental Impact Statement are as follows: Ladies and gentlemen of the Corps of Engineers, the Point Thomson Project is important to the state of Alaska and to its citizens. The project makes clean energy sources of natural gas and gas condensates available to Alaska and the U.S. It also brings jobs to Alaskans. Tonight I am working at a free health care clinic for homeless Alaskans, many of whom are in this predicament due to the inability to find jobs to support themselves. Alaskans need and welcome jobs in resource development. Of the five alternatives, Option B is clearly the most responsible. Option B requires the least water consumption and transportation activity. Special attention has been paid to stream crossings and preserving fish habitat. Barging schedules and other activities defer to polar bears, bowhead whales, ringed seals and other marine life. The project designers have thought of everything: The thickness of the pipeline is increased to deflect accidental bullet strikes; and even the textured,	141 Comment noted; no action required.

Comment	Response
coated pipeline surface allows it to bend with the environment. Most importantly, Alaskans will have opportunity for jobs and training. To date the project has accrued more than 3.5 million hours without a Lost Time Incident. This, along with accommodations for wildlife and land issues, represents a culture of safety for the environment and people. I support Option B for the Point Thomson development, as outlined in the Project Draft Environmental Impact Statement. Thank you.	

Comment	Response
	142 Comment noted; no action required. 143 The EIS uses the term "gathering lines" to simplify understanding for the general reader to distinguish between all production-related pipelines within the Point Thomson field and the pipeline that would be used to export hydrocarbon liquids to TAPS. 144 Comment noted; no action required.

Comment	Response
describing those alternatives and that the contractor ran out of copies of Executive Summary, and that was a little unfortunate for those of us who are just trying to get up to speed on this issue. Thank you.	

Comment	Response
0159_Lorali.Simon_APM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska Statement of Support for Alternative B 606 THE WITNESS: Good evening. I'm Lorali Simon, and I live in Palmer, Alaska. I support Alternative B outlined in the Point Thomson EIS. Alternative B provides the safest, most environmentally responsible solution for developing Point Thomson and ensures a minimal environmental footprint by incorporating a combination of summer coastal barging, winter ice roads, aviation and in-field roads. Through Alternative B, ExxonMobil will implement comprehensive mitigation measures to minimize impacts on tundra, wildlife, aquatic resources and subsistence activities. Approval of the Point Thomson Project, as proposed in Alternative B, is vital to the development of this world-class resource and North Slope natural gas commercialization. Direct benefits to the state of Alaska from Point Thomson include training and jobs for Alaskans, new revenues to the state and local governments, increased throughput for the Trans Alaska oil pipeline and increased business activity and revenue for the private sector. Point Thomson is a highly technical project with high costs. Unnecessary requirements that provide very little, if any, incremental environmental benefit should be avoided, so as not to compromise the economic viability of this project. Thank you.	606 Comment noted; no action required.

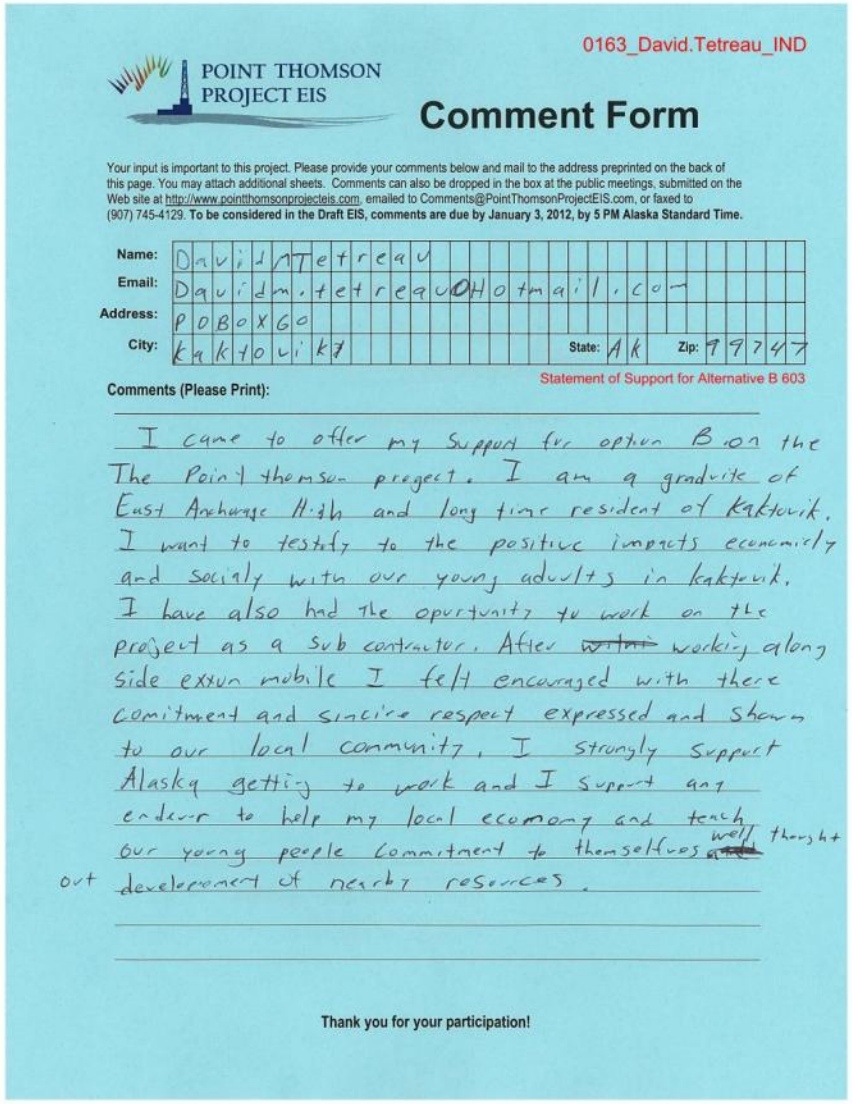
Comment	Response
0160_Maynard.Tupp_APM_SGOV POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska Statement of Support for Alternative B 145 MAYNARD TUPP: Is it all right if I stay seated? MAYNARD TUPP: My name is Maynard Tupp. I'm with the governmental office of the (Indiscernible), which is -- (Reporter requested clarification.) THE WITNESS: My name is Maynard Tupp. I'm the founding member of Hawk Consultants, LLC, which was started in 1985. We're a small business that provides human resources to the oil and gas industry, here in the state of Alaska, and throughout the U.S. Many of our people are classified as recycles or retreads, having worked for the industry for years and sometimes for major oil and gas producing companies. I strongly support the development of Point Thomson by ExxonMobil Corporation using their EIS Alternative B. I absolutely believe the following: It's in the world's and the United States' best interest for the U.S. to have a strong economy, independent from foreign oil and gas supplies within - in countries -- as opposed to in -- in -- located in countries that may -- that agree with our -- agree with our policies and positions of the world. It is in the State of Alaska's best interest to have a strong, trusted contributor, like ExxonMobil, fueling the state's economy in the form of jobs, tax revenues, and adding needed oil to the Trans Alaska Pipeline. Oil is the -- oil is the state's lifeblood and benefits everyone in the state, either directly or indirectly.	145 Comment noted; no action required.

Comment	Response
It is time for the United States, Alaska and its citizens to make our country fuel -- energy independent, so that we must never need to deploy our most valuable human resources in protection of our economy and our way of life. ExxonMobil has a long-standing philanthropic participation in Alaska, in a wide variety of community programs. One in particular is the ANSEP program at UAA. That's the Alaska Native Science and Engineering Program. This program has received special funding from ExxonMobil, supporting the education and development of Alaska Natives in the studies of engineering and science. Because of ExxonMobil's leadership, other companies, like Hawk, similarly support this and other programs. We need to recognize that, over the past 50 years, activity on the North Slope, Alaska, there's been minimal environmental damage relating to the oil and gas production. There's nothing in the oil -- on the North Slope of Alaska that will have any long-term affect on the environment other than the increased animal populations, as exhibited with the increase in caribou population at Prudhoe Bay. At most, we are borrowing time on the North Slope, and in this case, Point Thomson. We leave, after a few years, and it will be difficult or impossible to even know we were there, except for maybe a few roads that the tourists and the scientists use for their purposes. This could be a great legacy for future generations to use for study and enjoyment. For the minimal time we borrow this location, we will help America and Western Civilization stop reasons for the war and benefit the economy and participants in untold ways, positively affecting the citizens of Alaska and the United States. I strongly support EIS Alternative B. Thank you.	

Comment	Response
My name is Maynard Tapp and I am the founding member of Hawk Consultants, LLC, which started in 1985. We are a small business that provides human resources to the oil and gas industry here in the state of Alaska and throughout the US. Many of our people can be classified as "recycled or retreads" having worked in the industry for years and some times for the major oil and gas producing companies. **I strongly support the development of Point Thompson by ExxonMobil corporation using their EIS Alternative B.** I absolutely believe the following:- 1. It is in the world's and United States' best interest for the US to have a strong economy, independent of foreign oil and gas supplies located in countries that may not have interests that align with ours. 2. Is it in the State of Alaska's best interest to have a strong trusted contributor like ExxonMobil fueling the state's economy in the form of jobs, tax revenues, and adding needed oil to the Trans Alaska Pipeline System (TAPS). The oil is the states lifeblood that benefits everyone in the state, either directly or indirectly. 3. It is time for the United States, Alaska, and all its citizens to make our country fuel energy independent, so that we must never need to deploy our most valuable "human resources" in protection of our economy and way of life. 4. ExxonMobil has a long standing philanthropic participation in Alaska in a wide variety of community programs, one in particular, the ANSEP program at UAA. (Alaska Native Science and Engineering Program) This program receives special funding from ExxonMobil supporting the educational development of Alaska Natives in the studies of Engineering and Science. Because of ExxonMobil's leadership, other companies like Hawk similarly support this and other programs. 5. We need to recognize that in the past 50 years of activity on the North Slope of Alaska, there has been minimal environmental damage relating to the oil and gas production. 6. There is nothing on the North Slope of Alaska that will have any long-term effect on the environment other than an increase in the animal populations as exhibited by the increase in the Caribou population in the Prudhoe Bay area. 7. Ultimately, this project and projects like this on the North Slope will have minimal to no impact on 99% of the north slope. 8. At most we are borrowing time on the North Slope and in this case Point Thompson. When we leave, after a few years, it will be difficult if not impossible to even know we were there maybe a few roads that tourists and scientists may use for their purposes. This could be a great legacy for future generations to use for study and enjoyment. 9. For the minimal time we loan/lease this location, we will help protect America and western civilization, stop reasons for war, and benefit the economy and its participants in untold ways, positively effecting the citizens of Alaska and the United States. **In summary I strongly support the development of Point Thompson by ExxonMobil corporation using their EIS Alternative B.** Thank-you for the opportunity to testify. Maynard Tapp 200 W 34th Ave, #809 Anchorage, AK - 99503	Attachment to Comment 0160_Maynard.Tupp_AMP_SGOV Attachment not coded

Comment	Response
0161_Mila.Umanskaya_APM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska Statement of Support for Alternative B146 My name is Mila Umanskaya, and I'm a structural engineer for CH2M HILL, and I'm for Alternative B. And if we want to remain, our young professionals, in the state, we really need to develop our natural resources. Thank you.	146 Comment noted; no action required.

Comment	Response
0162_Moriah.Miles_APM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska Statement of Support for Alternative B 147 Hello, my name is Moriah Miles, and I am working on my master's over here at UAA. I was born and raised in Alaska and have grown up in the life of oil, gas and mining. It is my understanding that currently production and -- (Reporter requested clarification.) THE WITNESS: Hi, my name is Moriah Miles, and I'm working on my master's degree here at UAA. I currently work for CH2M HILL in the recruiting department, so I'm definitely trying to go out there and hire a bunch of those Alaskans. Projects like this could help. I grew up -- born and raised in Hatcher Pass, Alaska, grew up in a lifestyle of oil, gas and mining. My peers have enjoyed that lifestyle with me, as well, throughout the years. It's my understanding that production is at a decline on the Slope and that projects like this could help. And it's also my understanding that to keep that going we need to expedite these types of processes, and as such, I support Alternative B. Thank you very much for your time. I hope I've added relevancy as being a voice for my peer group. Thank you.	147 Comment noted; no action required.

Comment	Response
	603 Comment noted; no action required.

0163_David.Tetreau_IND

POINT THOMSON PROJECT EIS

Comment Form

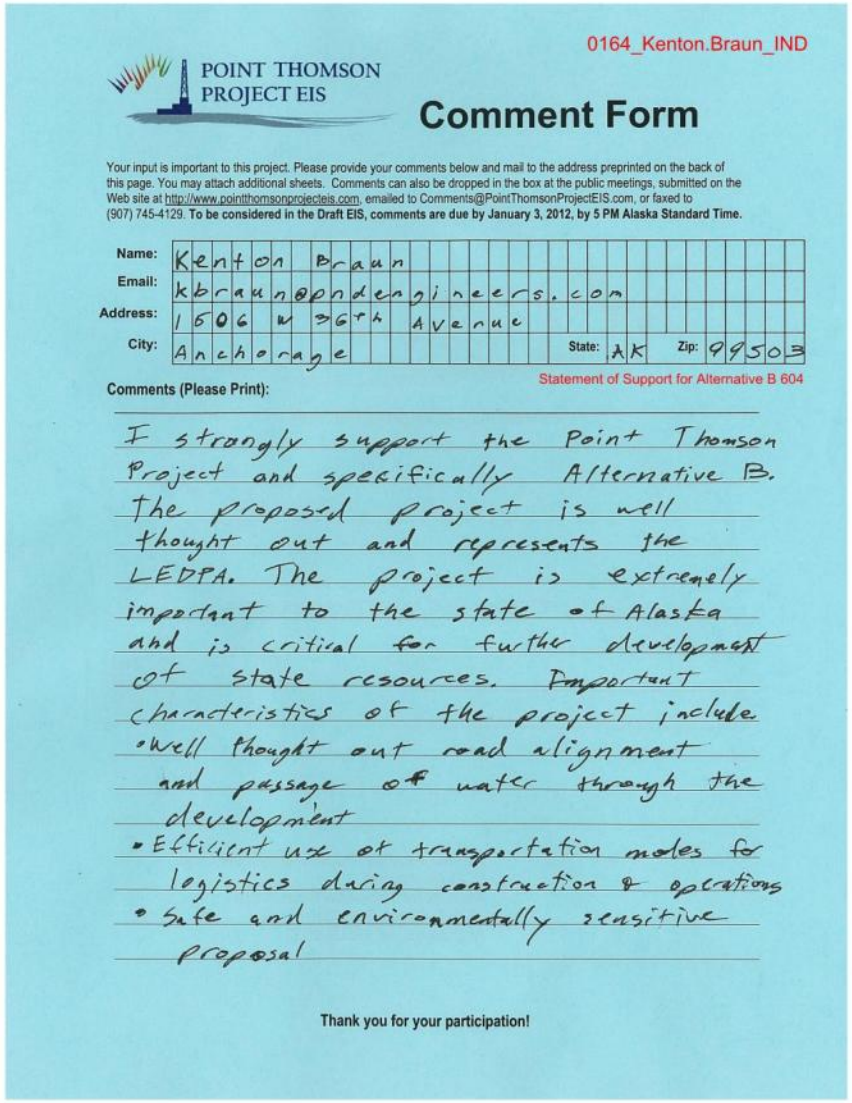
Your input is important to this project. Please provide your comments below and mail to the address preprinted on the back of this page. You may attach additional sheets. Comments can also be dropped in the box at the public meetings, submitted on the Web site at http://www.pointthomsonprojecteis.com, emailed to Comments@PointThomsonProjectEIS.com, or faxed to (907) 745-4129. **To be considered in the Draft EIS, comments are due by January 3, 2012, by 5 PM Alaska Standard Time.**

Name: David Tetreau
Email: David.m.tetreau@hotmail.com
Address: PO Box 60
City: Kaktovik State: AK Zip: 99747

Comments (Please Print): Statement of Support for Alternative B 603

I came to offer my support for option B on the The Point thomson project. I am a graduate of East Anchorage High and long time resident of Kaktovik. I want to testify to the positive impacts economicly and socialy with our young adults in Kaktovik. I have also had the opurtunity to work on the project as a sub contractor. After ~~with~~ working along side exxon mobile I felt encouraged with there comitment and sincire respect expressed and shown to our local community. I strongly support Alaska getting to work and I support any endever to help my local ecomony and teach our young people commitment to themselfves well thought out development of nearby resources.

Thank you for your participation!

Comment	Response
	604 Comment noted; no action required.

0164_Kenton.Braun_IND

POINT THOMSON PROJECT EIS

Comment Form

Your input is important to this project. Please provide your comments below and mail to the address preprinted on the back of this page. You may attach additional sheets. Comments can also be dropped in the box at the public meetings, submitted on the Web site at http://www.pointthomsonprojecteis.com, emailed to Comments@PointThomsonProjectEIS.com, or faxed to (907) 745-4129. **To be considered in the Draft EIS, comments are due by January 3, 2012, by 5 PM Alaska Standard Time.**

Name: Kenton Braun
Email: kbraun@pndengineers.com
Address: 1506 W 36th Avenue
City: Anchorage State: AK Zip: 99503

Statement of Support for Alternative B 604

Comments (Please Print):

I strongly support the Point Thomson Project and specifically Alternative B. The proposed project is well thought out and represents the LEDPA. The project is extremely important to the state of Alaska and is critical for further development of state resources. Important characteristics of the project include
- well thought out road alignment and passage of water through the development
- Efficient use of transportation modes for logistics during construction & operations
- Safe and environmentally sensitive proposal

Thank you for your participation!

Comment	Response
0165_Jeanine.St.John_BUS LYNDEN December 5, 2011 Lynden Incorporated 6400 South Airpark Place, Suite #1 Anchorage, AK 99502 (907) 245-1544 Fax: (907) 245-1744 Department of the Army U.S. Army Engineer District, Alaska Regulatory Division P.O. Box 6898 JBER, Alaska 99506-0898 Via email to harry.a.baij@usace.army.mil, Statement of Support for Alternative B 605 Comments on Point Thomson Project Draft Environmental Impact Statement (Draft EIS) Lynden is a multi-modal transportation and logistics company, with over 700 Alaska employees, a history of scheduled service to Alaska starting in 1954, and extensive activity throughout the state of Alaska, including support for all segments of the economy. Lynden has provided support services for the oil industry including significant logistics support for virtually every oil and gas project in Alaska. In addition to providing transportation and logistics services, one of our companies provides training to industry and government responders at our facility in Fairbanks. Our assessment is that Alternative B (coastal pads with in-field gravel roads) is the appropriate option for the Point Thomson Project. This project is important to the State of Alaska, and as a major transportation and logistics company operating in the State, we have been carefully reviewing the plans from a safety, environmental, and economic standpoint where logistics is an extremely critical component. We believe that the work done to date on the comprehensive logistics needs, including summer coastal barging, ice roads, aviation and in-field gravel roads is not only cost effective, but also essential to establishing the minimum environmental footprint, while ensuring the ability to develop this field. The strict requirements that will be placed on the subcontractors, such as ourselves, indicates the utmost concern for the environment and minimizes the impact on tundra and wildlife, including marine species. We have been working with Exxon and their other contractors, and believe that Alternative B is truly the most effective and appropriate option for this project. Other Key points for consideration and support of Alternative B: • Direct benefits to the State of Alaska from Point Thomson include training and jobs for Alaskans, new revenues to the state and local governments, increased throughput for the Trans-Alaska oil pipeline, and increased business activity and revenue for the private sector.	605 Comment noted; no action required.

Comment	Response
• Point Thomson is a highly-technical project with high costs. Unnecessary requirements that provide very little, if any, incremental environmental benefits, should be avoided as to not compromise the economic viability of the project. • The in-field roads included in Alternative B have been carefully routed to minimize the gravel footprint and for the efficient pass through of water. • Moving roads inland as proposed in Alternative C and D would increase the gravel footprint and be less effective in maintaining natural drainage patterns of the project area. • Alternatives C and D would move project components inland and eliminate barging, which is an established and safe means of supply for North Slope communities, including Prudhoe Bay. ExxonMobil has conducted safe barging operations in accordance with the Alaska Eskimo Whaling Commission Conflict Avoidance Agreement and in direct consultation with local whaling communities. 188 barging trips in support of Point Thomson have occurred with no impacts to marine mammals or subsistence. • Alternatives C and D both result in inefficient logistical support and adds unnecessary challenges. Eliminating summer barging would result in increased costs, schedule delays, and increased tundra traffic. • The 44-mile gravel road from Endicott to Point Thomson as proposed under Alternative C would create a much larger tundra footprint. Current North Slope experience at Alpine and Badami demonstrates that a gravel road is not necessary to support Point Thomson. However, not having a road connecting to Prudhoe Bay does make the combination of barging, ice roads, air access and in-field gravel roads essential. • Alternative E would eliminate in-field gravel roads and shorten the airstrip. This alternative relies solely on helicopters and seasonally limited off-road vehicles for transportation to East and West pads for nine months of the year. There is no North Slope precedent for a production facility with such limitations. Moreover, inability to fly in poor weather introduces unnecessary safety risks for personnel, as well as emergency response limitations and operational inefficiencies. • The longer runway in Alternative B provides better access in bad weather, reduces the number of flights by allowing larger aircraft for routine cargo shipments and allows for aircraft to transport larger equipment capabilities in the event of an emergency. The benefits to our company, our employees, and the State of Alaska are all critical for the future of Alaska. We are standing by with employees, vessels, aircraft, trucks, hovercraft, and all manner of logistics capabilities to assist Exxon in the development of Point Thomson, and we are simply waiting for the permitting agencies to complete their work with a green-light to proceed so we can put Alaskans to work. Sincerely, LYNDEN LOGISTICS Jeanine St. John Vice President	

Comment	Response
0166_Peter.Maxie_APM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska Statement of Support for Alternative B 148 PETER MAXIE: My name is Peter Maxie, I am an employee of a 50-man fabrication shop in Anchorage. Mostly, I want to continue working for a living, so I'm in support of Exxon's continued efforts on the Slope. The company I work for doesn't work solely for the oil company; they work for everyone, so that we can stay in business. Any customer is an exciting event for us, and so we're looking forward to them working here. I'm in favor of Alternative B. I don't know if it's necessarily the most economic alternative, but that doesn't seem to count in a lot of these projects. I think the biggest thing is I'm an Alaskan resident, and I'd like to see a little bit more exploitation of our own resources. I believe the first wells were drilled when I was still a teenager, and I just turned 60, and I'd like to work a little more here. And I wanted to last long enough so that -- this lady did the little peace sign. Thanks for your time.	148 Comment noted; no action required.

Comment	Response
0167_Rachel.Petro_APM_NGO POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska RACHAEL PETRO: Petro. Statement of Support for Alternative B 149 Good evening. For the record, my name is Rachael Petro, and I serve as the President and CEO of the Alaska State Chamber of Commerce. The Alaska Chamber strongly supports oil and gas exploration and production in Alaska, whether on state or federal land. The Alaska Chamber represents hundreds of businesses and thousand of Alaskans, from Ketchikan to Barrow. The proposed Point Thomson is important to the Alaska Chamber members and the state as a whole. Alaska Chamber businesses provide the economic engines of Alaska, providing thousands of jobs to people who want to live and work in Alaska. In order to become a state, Alaska had to prove it could pay its own way, and overwhelmingly Alaskans want to do that. Projects such as the Point Thomson Project are key to making sure Alaska can keep that commitment they made at statehood. Alaskans choose to live and work in Alaska because we love Alaska, and for that reason, Alaska Chamber members don't just support development, but, rather, environmentally responsible development. Many Alaska Chamber members have been here for more than a generation, and they desire an economically healthy, beautiful Alaska for future generations. The Alaska Chamber supports Alternative B as it ensures a minimal environmental footprint by incorporating a combination of summer coastal barging, winter ice roads, aviation and in-field roads. These features are essential to the project's safe and efficient operation. Additionally, Alternative B ensures comprehensive mitigation	149 Comment noted; no action required.

Comment	Response
measures to minimum impacts on tundra, wildlife, aquatic resources and subsistence activities. The Point Thomson Project will provide wide-ranging benefits to Alaska in the form of new business opportunities, jobs and revenues. Approval of the project, as proposed in Alternative B, is vital to the development of this world-class resource and North Slope commercialization, and it is vital to Alaska being able to pay its own way, as promised at statehood. Even federal land management designations allowing for development and access present ample challenges for actual access and/or development. Treatment of the project area, which is on state land as federal wilderness area, is completely unacceptable. Such treatment of state land breaks the federal commitment made at statehood. Thanks for the opportunity to testify this evening, and we encourage you to move as expeditiously as possible, given the already delayed project and to issue an FEIS with Alternative B as the preferred proposal and get this project going. Thank you.	

Comment	Response
0168_Reed. Christensen_APM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska REED CHRISTENSEN: Thank you. Statement of Support for Alternative B 150 My name is Reed Christensen and I'm here to testify in support of the Point Thomson Project. I have many reasons why I'm here before you this evening; four of them are my very own children. I'm concerned about their future in this state. Oil production as well as throughput in the Trans Alaska Pipeline are down. The pipeline is two-thirds empty and getting worse. If we do not do something now, the number of youth in the next generation that will be able to stay in Alaska will be done, as well. I work for a manufacturing company here in Anchorage. I would rather export value-added products instead of exporting our youth. In order to do that, we need a vibrant and growing economy, not a shrinking economy bogged down by never-ending litigation. Alaska, as well as the nation, needs jobs and energy. The development of Point Thomson can successfully contribute to both. The Trans Alaska Pipeline is facing significant technical challenges due to the decline in throughput, combined with the lower temperatures of the oil going through the pipeline. Money from oil funds over 90 percent of the State's entire budget. If the pipeline is shut down, we will all be in serious trouble. That is why Mark Hamilton makes the statement that if you live in Alaska then you are in the oil business. There are not enough people or businesses in this state to be continued on next page	150 Comment noted; no action required.

Comment	Response
continued from previous page taxed to even come close to covering this gap. Whether people like it or not, oil is the lifeblood of our state. In addition to my support of the Point Thomson Project as a whole, I would also like to express my support of Alternative B within this project. We need to keep this project moving forward for the benefit of all Alaskans, as well as for the benefit of the country, as we work to keep our state a great place to live and our country less dependent on oil coming from Third World countries, with little to no regard for the environment. It is in best interest of the environment to develop projects like Point Thomson right in our own backyard where we can see exactly what is going on and where we are putting the investment back into our own economy. Thank you.	

Comment	Response
0169_Sami.Glascott_APM_NGO POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska THE WITNESS: My name is Sami Glascott. I'm with the Anchorage Chamber of Commerce. Today, businessweek.com announced that it ranked Anchorage tenth, as the best city in America; tenth. Based on 16 criteria, we ranked tenth on the number of restaurants, bars and museums per capita, the number of colleges, libraries and professional sports teams -- imagine that -- the income, poverty, unemployment, crime and foreclosure rates, percent of population with bachelor's degrees, public school performance, park acres per 1,000 residents and air quality. Comparatively, we enjoy a very healthy, high-quality way of life, but we must understand that none of these factors would be possible without securing a pipeline of successful resource development projects. The Anchorage Chamber consists of nearly 1,100 businesses that represent over 60,000 of Anchorage's employees. We are the largest business organization in the state and have been here since 1915. Supporting continued development is imperative to our economy and sustaining the quality of life in Anchorage and Alaska. We support Alternative B as the safest, most environmentally responsible solution for developing the Point Thomson resources in a timely, cost-effective manner. Thank you. Statement of Support for Alternative B 151	151 Comment noted; no action required.

Comment	Response
0170_Steve.Connelly_APM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska Statement of Support for Alternative B 152 THE WITNESS: My name is Steve Connelly. I've lived and worked in Alaska, wherever I could, to support my family, for the past 30 years. I agree with all the previous speakers who spoke of the great economic potential for the Point Thomson Project. But, unfortunately, I don't think that carries any weight with the governmental process that we go through here. Safety and the environment should carry weight, and my brief remarks will be regarding that. I believe Alternative B provides the safest, most environmentally responsible solution for developing Point Thomson's resources. It provides for summer coastal barging, winter ice roads, adequate aviation facilities and in-field roads. These features are essential to the project's safe and efficient operations. Point Thomson is a technical project with high costs. Unnecessary requirements that provide very little, if any, incremental environmental benefits should be avoided so as not to compromise the economic viability of the project. Thank you.	152 Comment noted; no action required.

Comment	Response
0171_Tom.Hendrix_APM_NGO POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska TOM HENDRIX: Thank you. Statement of Support for Alternative B 153 Good evening; for the record, my name is Tom Hendrix. I'm the Vice President of Strategic Business Development for Carlile Transportation Systems, and I'm the current president of the Alaska Support Industry Alliance. I'm here tonight to encourage you to approve Alternative B for the Draft EIS for the Point Thomson Project. It is clear, from an objective comparison of proposed alternatives, that Alternative B provides the safest, most environmentally responsible solution for development of this critical resource. From acres of gravel used, to the number of land transport round trips, it's clear that Alternative B ensures a minimal environmental footprint. The number of helicopter transports alone, as proposed in Alternative B, are 80 percent less than the other alternatives provide. As President of the Alaska Support Industry Alliance, it is very clear to me that the benefits of this project are life-changing for -- excuse me -- life-changing for the state of Alaska and the federal government. The commercialization of Alaska's natural gas depends on this project moving forward. Securing long-term, high-paying jobs for Alaskans depends on this project moving forward. Securing a significant revenue for the North Slope Borough and the State of Alaska depends on this project moving forward. And last, but absolutely not least, securing Alaska's energy future depends on this project moving forward. Continued on next page	153 Comment noted; no action required.

Comment	Response
Continued from previous page Please approve the Draft EIS Alternative B: It clearly -- it is clearly a win-win situation; with stringent mitigation measures in place for polar bears and other marine mammals, with a keen focus on protecting subsistence alternatives in the area, as well as increasing jobs and revenue for Alaskans in and the State of Alaska, this is clearly the best path in moving forward. Thank you for your time.	

Comment	Response
0172_Tom.Maloney_APM_Bus POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 5, 2011 Z.J. Loussac Public Library - Wilda Marston Theatre Anchorage, Alaska Statement of Support for Alternative B 154 TOM MALONEY: Good evening. Can you hear me okay? Okay. Good acoustics. My name is Tom Maloney. I'm a long-term resident of Anchorage and Alaska Area Manager for CH2M HILL. CH2M HILL is employee-owned and one of the top private employers in the state of Alaska with over 2,500 current employees. We serve customers in the oil and gas, federal, state and local governments and various other industries. Work scopes for oil and gas customers include engineering and consulting, construction, operations and maintenance and drilling support services. In our company's opinion, Alternative B is the best solution for Point Thomson. We are confident this plan fully incorporates best practices and lessons learned from well over 40 years of North Slope Alaska Arctic experience. ExxonMobil has been active participants on several multi-billion dollar projects on the North Slope. Many of these mega projects were with other Point Thomson owners. These projects include all of the huge gas handling facilities at Prudhoe Bay, the largest oil field in North American history. ExxonMobil has solicited input from numerous contractors and resource owners on drilling, facilities, pipeline, environmental, stakeholder engagement and other project considerations. Several hundred million dollars of drilling results were fully incorporated into the	154 Comment noted; no action required.

Comment	Response
planning process. It is time to get Alaskans and other Americans working on privately financed projects like Point Thomson. We need this critical gas and oil resource to stimulate jobs, tax revenues and consumer confidence. Alaskans need gas to heat their homes, and Point Thomson has 25 percent of the North Slope proven gas reserves. Our Trans Alaska Pipeline System, or TAPS, could also use the oil. Thanks for being in Anchorage and soliciting our input this evening. Thank you.	

Comment	Response
0173_Zeb.Woodman_FPM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 7, 2011 Wedgewood Resort - Taiga Center Fairbanks, Alaska Support for Alternative B 155 ZEB WOODMAN: Hi, my name is Zeb Woodman. I'm a lifelong resident of Fairbanks, Alaska. I'm a 17-year member of Local 942 here in Fairbanks. And today I'm speaking in support of Alternative B. This field, we all know, contains large amounts of natural gas and oil, and approximately 25 percent of the North Slope's known natural gas. If we develop it, we could -- we could possibly get that natural gas into an in-state gas line. That would create jobs that we desperately need, as well as the in-state gas. Alternative B provides the safest, environmentally responsible solution for developing Point Thomson's resources. It incorporates all the different ways that we do construction on the North Slope. I've worked up there quite a bit. The footprint that is needed nowadays has been drastically reduced through the years. Long, directional drills have not only become possible but now are the norm. Winter ice roads, a small airport, and in-field roads, I don't think this is too much footprint to ask for. And it would be -- these would be essential to safe operations of the developing field. At this point, the approval of Point Thomson project Alternative B is vital to the development of our world-class resources and natural gas on the North Slope. There would be direct benefits to the state, including throughput jobs, obviously money, and hopefully a local, in-state gasline. continued on next page	155 Comment noted; no action required.

Comment	Response
continued from previous page If that's 25 percent of the Slope's natural gas and it gets developed, it could spur an in-state line and that would put a lot of Alaskans to work, as well as ease our -- our need for economic fuel source here in Fairbanks and North Pole. Thank you for your time.	

Comment	Response
0174_Warren.Christian_FPM_Bus POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 7, 2011 Wedgewood Resort - Taiga Center Fairbanks, Alaska Statement of Support for Alternative B 156 WARREN CHRISTIAN: Hello, my name is Warren Christian. I've been living in Fairbanks here for many years, most of my life. I'm president of Doyon Associated, a local construction company that does work on the North Slope. I just want to say that I have had the privilege of being able to be part of some of these remote sites that were built up on the North Slope. I've worked up on the North Slope for the last 30 years. I was part of the Alpine project, the North Star project, the Badami project. And I'm very pleased to see that Exxon has gone to great, great lengths to ensure that Alaskans are included in this -- in comment and in the development of this project. I am in support of Alternative B. I also want to compliment Exxon on the work they've done to ensure that they not only select Alaskan contractors to bid on this work, but Alaskan contractors will have a great safety and environmental record, and also Alaskan contractors who hire Alaskans, so regardless of who gets awarded this work, this will be a great, great project for Fairbanks and Alaska. This will -- the contractors use local vendors, both here and throughout the state. So regardless of who wins this, this will be good for Fairbanks. I've never been so pleased to reply to an RFP as I have to this one. I have done several of them in the past and this one here has definitely gone through the extra lengths to ensure that Alaskans are included in the development of this continued on the next page	156 Comment noted; no action required.

Comment	Response
continued from the previous page project. So it is important that we push this project forward and get this oil going and get it into the pipeline. And it will be great for Fairbanks and the State of Alaska. Thank you.	

Comment	Response
0175_Tom.Bundtzen_FPM_Bus POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 7, 2011 Wedgewood Resort - Taiga Center Fairbanks, Alaska Statement of Support for Alternative B 157 TOM BUNDTZEN: Well, I'll make it short. I heard an earlier presentation -- I'm with the Chamber of Commerce, Natural Resource Committee, and I'm Tom Bundtzen. I run a small geological firm, Pacific Rim Geological Consulting here in Fairbanks. I've been in Alaska since 1959. I was just a kid when I came up here, and I watched -- I watched statehood come in as a little kid. And then I watched some uncertain times in the '60s. And then we got lucky and found all that oil on the North Slope. And believe me, without that discovery and development, we would all be poor because it has done so much to the citizens of Alaska. It's really not what I do as a living. I'm a metals geologist. But I have to reference the oil companies that develop the North Slope for the wealth that we all benefit from, including our schools and our -- and our communities and everything. It's so important to us. I support Alternative B. I think ExxonMobil has done an outstanding job of taking a close look at all of the alternatives. And I think they've come up with the alternative that has the least environmental impact on this area. A small airstrip, not so much gravel being used -- we asked that question earlier today -- a minimal amount of water. They took a hard look at how to -- how to develop this resource. I'm looking forward to the development of those gas liquids, in the near term because it's going to do so much good to the Trans Alaska continued on next page	157 Comment noted; no action required.

Comment	Response

continued from previous page

Pipeline. It's going to -- it's going to be a good additive to the pipeline. It's going to reduce corrosion. It's going to -- it's going to help with the paraffin buildups that we're starting to see, and it's kind of a concern now for the operation of the TAPS pipeline.

And certainly, in the near term, that's a good thing. You almost feel like, it's like an additive you put in an older car or something, just to make that -- make that pipeline work a little better. It's not so much it's 10,000 barrels were made initially, but it will add up to 50 or 60,000. But that will do a lot of good, as well as generating increased revenues.

And hopefully, development of Point Thomson will lead the way a bit, a few more years down the road, toward the development of a large -- a large gasline and another -- and another new part of our economy.

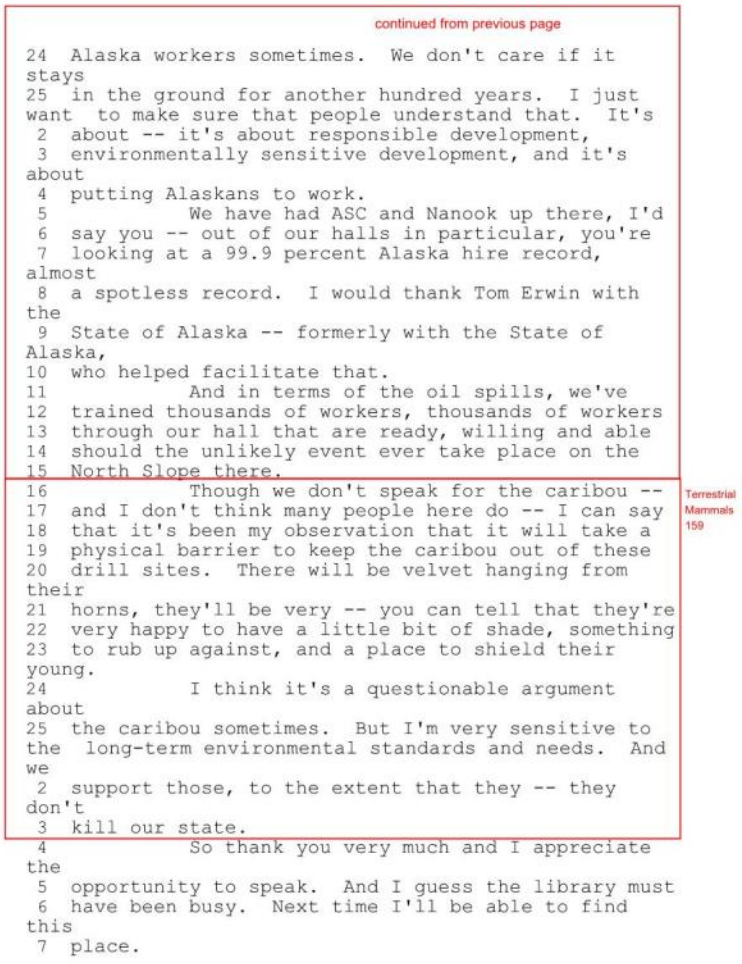
It -- and a reference was made earlier about it's being proximal to the Alaska -- the National Wildlife Refuge. Well, I -- I -- I acknowledge that, it's -- it's -- it's a great Refuge. We should all honor it. But it is next to the 1002 lands which are set aside by the United States Congress to take a look at for potential future development, and the same kind of development.

So I don't really think this is an incompatible thing.

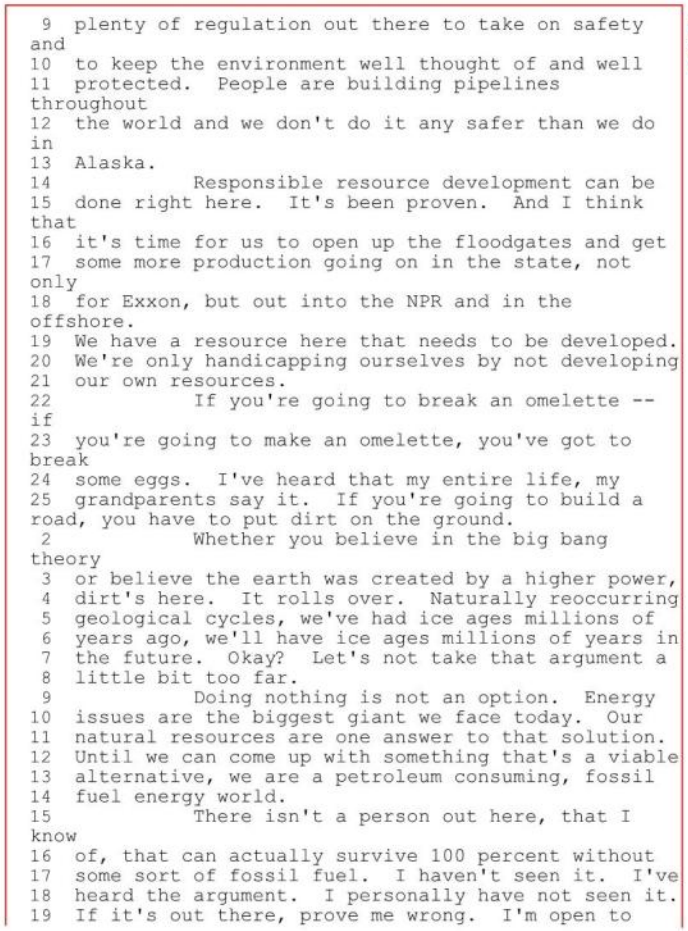
I think the way Exxon has approached this is so -- so -- I just have to congratulate them for minimal impacts. I believe decades from now, when the oil and gas are finally exhausted in that area, which they will be some day, that area will become back to a primitive and wilderness character. And that's really what we all want to see in the long term.

So it's going to be good for Alaska on the short term, and good for Alaska on the long term. And I think I'll leave it at that. Thank you.

Comment	Response
0176_Tim.Sharp_FPM_NGO POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 7, 2011 Wedgewood Resort - Taiga Center Fairbanks, Alaska Statement of Support for Alternative B 158 TIM SHARP: My name's Tim Sharp. I'm the business manager of Laborer's Local 942, about 1,500 Alaskan workers in northern, central and southeastern Alaska. I also represent the Alaska District Counsel of Laborers, about 5,000 statewide members. Here to speak in strong support of Alternative B and applaud Exxon to date on their Alaska hire record. It's been stellar so far, and I want to put everybody at ease that so far they've done a very good job. I'm in favor of Alternative B mainly because it has the necessary environmental safeguards that will ensure, in my mind, responsible development. And right now for us, both in Fairbanks and I think, too, to a certain extent, the United States, it's about work, jobs, and cheaper energy. Further selfish agenda is, we want wages and benefits to stay in Alaska, spend four or five times, help the businesses develop, pay mortgages, build the state, keep our kids here, create and foster the apprenticeship programs that we've created to put Alaskans to work. That being said -- and I want to make sure that I am on record on this -- if we don't have Alaska hire from our end, we don't care if -- and I say Alaska hire, that means workers and that means Alaska contractors, who sometimes have been more -- Alaska contractors have been more overlooked than Continued on next page	158 Comment noted; no action required.

Comment	Response
	159 The use of the Point Thomson Project study area by caribou and the potential impacts of the project on caribou (including caribou use of gravel pads and other infrastructure) are discussed in Chapters 3 and 5 of the EIS.

Comment	Response
0177_Shawn.Lowry_FPM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 7, 2011 Wedgewood Resort - Taiga Center Fairbanks, Alaska SHAWN LOWRY: My name is Shawn Lowry. I'm a business agent with the Operating Engineers. I'm as close to being a lifelong Alaska resident as you can be without actually being born in the state. The pipeline brought my parents up here when I was just a tiny kid, so I've been here my entire life. The oil industry has provided for my family and I hope it continues to provide for my extended family that continues on. I want to applaud Exxon for your -- your manhour safety presented for the work that you've done to this point. Without lost time incident, that's tremendous speaking, and I applaud you for that. As well as your use of Alaskan contractors and Alaskans on your project. I've known, out of our hall, hundreds of people have gone to work for you in the last few years, as you were doing your exploration drilling out there. I also want to applaud you on a very well thought out and well-presented impact statement for the environment today. What you showed today is -- shows that you're thinking within the bounds that you've been constrained in, and I personally applaud that and think this -- it's very well. First off, I want to say, this isn't in the Refuge, so let's leave the Refuge out of the conversation. If you continue to expand the buffer zone, then where does the Refuge end? It won't. So it's not in the Refuge; leave it out of the equation. We're talking about lands that have been set aside, state lands, to be developed. There's Statement of Support for Project 160 Arctic Refuge 161	160 Comment noted; no action required. 161 The EIS acknowledges that the project is on state lands that are managed for oil and gas development activities, and does not make reference to a buffer in the text of the analysis. NEPA requires the federal agency to examine potential impacts to resources affected by a proposed action. Analysis of impacts to the Arctic Refuge are included in the EIS due to its proximity to the proposed project.

Comment	Response
 Statement of Support for Alternative B 162	162 Comment noted; no action required.

plenty of regulation out there to take on safety and to keep the environment well thought of and well protected. People are building pipelines throughout the world and we don't do it any safer than we do in Alaska.

Responsible resource development can be done right here. It's been proven. And I think that it's time for us to open up the floodgates and get some more production going on in the state, not only for Exxon, but out into the NPR and in the offshore. We have a resource here that needs to be developed. We're only handicapping ourselves by not developing our own resources.

If you're going to break an omelette -- if you're going to make an omelette, you've got to break some eggs. I've heard that my entire life, my grandparents say it. If you're going to build a road, you have to put dirt on the ground.

Whether you believe in the big bang theory or believe the earth was created by a higher power, dirt's here. It rolls over. Naturally reoccurring geological cycles, we've had ice ages millions of years ago, we'll have ice ages millions of years in the future. Okay? Let's not take that argument a little bit too far.

Doing nothing is not an option. Energy issues are the biggest giant we face today. Our natural resources are one answer to that solution. Until we can come up with something that's a viable alternative, we are a petroleum consuming, fossil fuel energy world.

There isn't a person out here, that I know of, that can actually survive 100 percent without some sort of fossil fuel. I haven't seen it. I've heard the argument. I personally have not seen it. If it's out there, prove me wrong. I'm open to

Comment	Response
discussion. And the projected throughput that you have mentioned today is promising. For a cold shutdown that we had last January with the line break at Pump Station 1, it almost crippled this entire state. I mean, we're an oil state, whether we like it or not. We are an oil state. The projected throughput from this project, in its beginning phases, should be enough for us to get onboard and get this thing going. I believe that this opportunity to -- well, this -- this Option B provides the best -- the best option that we have right now for this project. It gives you all three of your transportation needs; you have your airstrip that's needed, you have road access during the winter, and you have the barges. All three of those things are essential for a project like this. I feel that this -- that's the best way to go. Need provides the revenue, not only to the state, but it provides income to employees; not only income just for the building phase, but in the project those are jobs that Alaskans can have. And if you look in the long term -- and there's some things that we've, you know, brought workers up from other states -- we can be training people now for those jobs if we know they're coming. We can put Alaskans to work for decades. Okay? Careers, grandchildren's careers, it can all be done if we open up and start developing our own resources. I honestly believe that B has the minimal impact on the environment and I'm fully in support of this project and what it represents to Alaska, what it represents to Alaskans, what it represents to me and to my future family. Not only is it jobs now, but it's jobs for the future. This project is key	

Comment	Response
for us to be able to develop future resource development in this state. I'm all for that. I thank you for the time to speak today and I encourage you to hasten your approval of this project.	

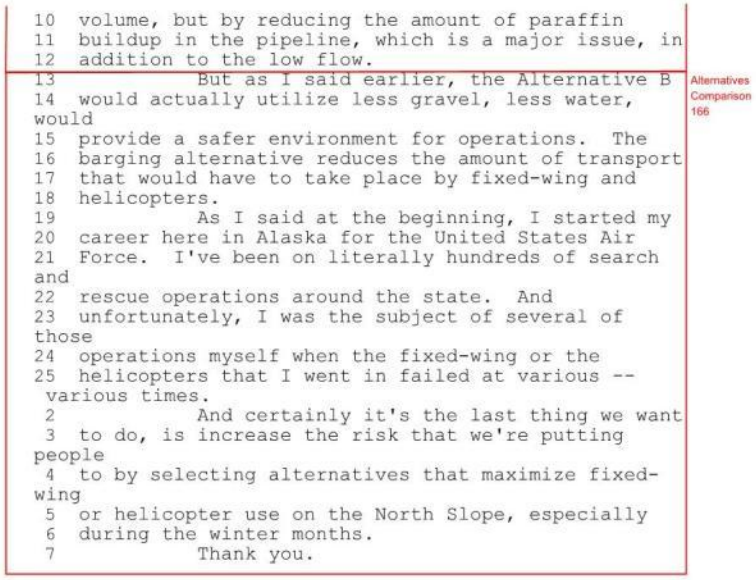
Comment	Response
0178_Scott.Eickholt_FPM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 7, 2011 Wedgewood Resort - Taiga Center Fairbanks, Alaska Statement of Support for Alternative B 163 SCOTT EICKHOLT: My name is Scott Eickholt. I'm an Alaskan resident. I'm a proud Laborer's 942 union member. I work in an industry that serves the construction and maintenance of the petroleum industry, as well as the environmental aspect of the industry; specifically training in spill response, hazardous material handling and cleanup, and other various duties associated with the related hazards. I'm speaking to support Alternative B of the DEIS. This alternative will allow for the most responsible development of the Point Thomson area. Alternative B ensures a minimal footprint by incorporating a number of different access options. While access is essential to the project's safety, efficiency and production, the environmental impact to tundra, wildlife and subsistence activity is minimized under this alternative. Point Thomson will provide great benefits to Alaska and Alaskan residents by way of new business opportunities, jobs, revenue, and most important, an opportunity to create a stable supply of energy. With a healthy source of natural gas, the reality of an in-state pipeline could become realized. This could spark economic development on an unprecedented scale. With throughput in our TAPS decreasing at a significant rate, it's essential to the condition of the infrastructure to increase throughput as soon as possible. It is the responsibility of all parties involved to increase the viability of our infrastructure in our state, as well as the revenues	163 Comment noted; no action required.

Comment	Response
25 that support almost every aspect of how Alaskans live their day-to-day lives. 2 Thanks for the opportunity to testify.	

Comment	Response
0179_Roger.Burggraf_FPM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 7, 2011 Wedgewood Resort - Taiga Center Fairbanks, Alaska Statement of Support for Alternative B 164 ROGER BURGGRAF: I'm Roger Burggraf. Reside at 830 Sheep Creek Road; Fairbanks, Alaska. I've been a resident of Alaska for about 60 years now. My career has -- I've been in banking, I helped work on the Trans Alaska Pipeline and I've been involved in mining for many years now. My degree in college was resource development, wildlife management. And I came to this country because I felt I loved it and I felt it had a great deal of opportunity for a person that wants to go out and make a life for himself. I have reviewed all five alternatives proposed for consideration in the EIS. This is one of the best EIS proposals I've had a chance to review, and I've looked at a lot of them. I support the Alternative B. I feel that it is -- is the best one. It's primarily set up for coastal pads with in-field gravel roads, docking facilities, and I feel that this alternative would be the least environmentally damaging. I feel the pads that are proposed have been researched and they offer the best opportunity for drilling into the reserves. I am not in favor of moving, you know, the East Pad. The project is critical to keeping the Trans Alaska Pipeline operating, and it's not a real large field but it's an important one for getting new oil into the pipeline. It would provide jobs for over 600 people during the construction period, and I was told probably about 50 permanent jobs, once it gets started.	164 Comment noted; no action required.

Comment	Response
It will provide feed stock for the pipeline, which is critical for Flint Hills, the refining company producing diesel. And that refinery is critical for Fairbanks, provides jobs and it also provides fuel for Anchorage, and also for the railroad. So we're looking at something that could help to create jobs for the Fairbanks community and allow us in Fairbanks to be able to survive the period until such time, hopefully, the offshore drilling project gets off the ground and maybe the Alpine project starts producing oil. But oil is our lifeblood, whether we like it or not, and it's important for the community and for the people of Alaska. So basically, I've probably covered the points I wanted to make. Alternative B is the best one, and it's going to -- I feel environmentally it's the most sound, would disturb the least ground, and be environmentally the best project. Thank you very much.	

Comment	Response
0180_Paul.Metz_FPM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 7, 2011 Wedgewood Resort - Taiga Center Fairbanks, Alaska Statement of Support for Alternative B 165 PAUL METZ: My name is Paul Metz. I reside at 3510 Rosie Creek Road; Fairbanks, Alaska. I've been a resident of Alaska since 1968. And I started my career here by supporting activities on the North Slope and -- including the Kaktovik area, for the United States Air Force. I'm a geological engineer by profession. I teach at the University of Alaska Fairbanks, and I'm also chair of the Association of Environmental & Engineering Geologists for the Alaska section. I'm speaking here on behalf of myself, rather than the University or the AEG. I would just like to -- to ratify the comments that the executive director of the Fairbanks Chamber provided you with previously. I'm also the chair of the resources committee for the Greater Fairbanks Chamber of Commerce. Just a few additions to Lisa's comments. When we look at the cumulative consumption of materials, land and water, in support of this economic development -- and this is a significant resource, eight trillion cubic feet of natural gas and 200 million barrels of condensate is not a trivial resource. The -- the eight TC of the gas would be equivalent to about a hundred years of Alaskan consumption at -- at current rates, consumption for the entire state. The -- the condensate would have a very positive impact on the -- the throughput through the Trans Alaska Pipeline by -- by not only adding	165 Comment noted; no action required.

Comment	Response
	166 The Corps agrees that less time in the air equates to less chance of aviation-related incidents and recovery expeditions.

volume, but by reducing the amount of paraffin buildup in the pipeline, which is a major issue, in addition to the low flow.

But as I said earlier, the Alternative B would actually utilize less gravel, less water, would provide a safer environment for operations. The barging alternative reduces the amount of transport that would have to take place by fixed-wing and helicopters.

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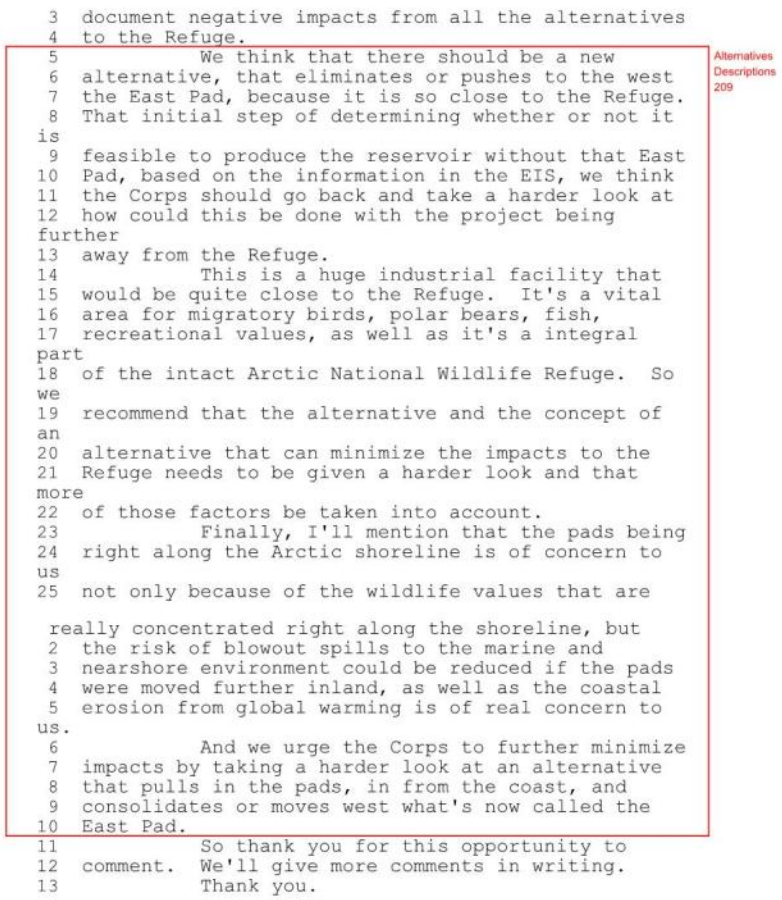
As I said at the beginning, I started my career here in Alaska for the United States Air Force. I've been on literally hundreds of search and rescue operations around the state. And unfortunately, I was the subject of several of those operations myself when the fixed-wing or the helicopters that I went in failed at various -- various times.

And certainly it's the last thing we want to do, is increase the risk that we're putting people to by selecting alternatives that maximize fixed-wing or helicopter use on the North Slope, especially during the winter months.

Thank you.

Comment	Response
0181_Pam.Miller_FPM_NGO POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 7, 2011 Wedgewood Resort - Taiga Center Fairbanks, Alaska PAM MILLER: Will this work? Hello, I'm Pam Miller. Thank you for this opportunity to comment. I'm here today representing Northern Alaska Environmental Center. We're a regional, grassroots conservation group who celebrated our 40th year this year. We appreciate commenting on this proposed Point Thomson gas condensate development on State of Alaska lands. And it includes a drill site two miles away from the Arctic National Wildlife Refuge. For that reason we really appreciate that the Corps of Engineers has recognized a unique characteristic of this project, which is its proximity to the Arctic National Wildlife Refuge. I do also recognize that this is State of Alaska lands, that this is lands that are slated and zoned, in effect, for oil and gas development. So we're taking that as a given. What I'm here to comment on today is aspects of how can environmental impacts from this project be reduced and measures that could minimize project impacts to the wetlands, to the coastal zone and to the nearby national wildlife refuge. To put it in context, we know that 50 years ago, President Eisenhower's interior secretary, at the same time that the Arctic Refuge was designated opened, the lands that are now Point Thomson and Prudhoe Bay and the prize of Prudhoe Bay was given to the state. There was a balance in land use. The	

Comment	Response
18 Arctic Refuge over here, the oil and gas development 19 over here. So that line that's the boundary of the 20 Arctic Refuge is a very important line. 21 We recognize that this reservoir, at least 22 according to the EIS, is outside the Arctic Refuge. 23 We're not talking about activities in the Refuge. So 24 we're acknowledging that, I want to make it clear, 25 that the nature of our comments on this project, because the Refuge is so close to the proposed 2 project, we are looking at some ways that you can 3 minimize impacts. 4 One other thing I wanted to mention, in 5 terms of the context of the project, is that we do 6 know that there's currently still a pending court 7 dispute between the State of Alaska and Exxon 8 regarding the validity of these leases, and that is a 9 fundamental factor of this project. So maybe 10 there is a settlement brewing. That's the rumor, but 11 it is not yet a done deal. 12 Also, this is not the huge national gas 13 development project. This is a very first step. So 14 we're not here to talk about the development of 15 natural gas as a, you know -- that depends on the 16 pipeline down south from Prudhoe Bay. 17 And I also will note that the amount of 18 hydrocarbons that are proposed to be produced from 19 this project are not acknowledged. So to see what's 20 the benefit to State of Alaska and to consumers 21 ultimately from this project, we need more of that 22 information. 23 So to get at the nuts and bolts of my 24 recommendations, we thank the Corps of Engineers for 25 commissioning the noise and visual resources studies that have assessed the potential impacts to the 2 Refuge. This was important research and it did	

Comment	Response
 document negative impacts from all the alternatives to the Refuge. We think that there should be a new alternative, that eliminates or pushes to the west the East Pad, because it is so close to the Refuge. That initial step of determining whether or not it is feasible to produce the reservoir without that East Pad, based on the information in the EIS, we think the Corps should go back and take a harder look at how could this be done with the project being further away from the Refuge. This is a huge industrial facility that would be quite close to the Refuge. It's a vital area for migratory birds, polar bears, fish, recreational values, as well as it's a integral part of the intact Arctic National Wildlife Refuge. So we recommend that the alternative and the concept of an alternative that can minimize the impacts to the Refuge needs to be given a harder look and that more of those factors be taken into account. Finally, I'll mention that the pads being right along the Arctic shoreline is of concern to us not only because of the wildlife values that are really concentrated right along the shoreline, but the risk of blowout spills to the marine and nearshore environment could be reduced if the pads were moved further inland, as well as the coastal erosion from global warming is of real concern to us. And we urge the Corps to further minimize impacts by taking a harder look at an alternative that pulls in the pads, in from the coast, and consolidates or moves west what's now called the East Pad. So thank you for this opportunity to comment. We'll give more comments in writing. Thank you. Alternatives Descriptions 209	209 The Corps is not looking at an alternative that eliminates or moves the East Pad to the west. This alternative (Concept 6) was eliminated from detailed consideration for not meeting the purpose and need of the project. The language in Section 2.2.4.2 has been supplemented to make this decision clearer. Without the ability to drill wells from the vicinity of the proposed East Pad, the Applicant would not be able to access eastern resources that have already been identified in approximately one-third of the Thomson Sand Reservoir. A well from the Central Pad would have to reach more than 30,000 feet, which is technologically infeasible. Reduced access to the eastern portion of the reservoir would limit the Applicant's ability to continue evaluation and delineation activities, including fully delineating the eastern edge of the reservoir, testing connectivity with the central portion of the reservoir, and fully evaluating the Thomson Sand oil rim and Brookian Group sandstones hydrocarbons. Concerning an alternative that pulls the pads back from the coast, the Applicant's Technical Brief #1 stated that a "Pad location further inland from the coast will increase the throw on all wells and potentially preclude the ability to reach portions of the reservoir necessary for full field development. This may lead to additional pads being needed in the future to reach bottomhole targets that cannot be reached from a pad that has been located further inland." In other words, a trade-off of moving pads inland would be the potential future need for additional pads closer to the reservoir (i.e., along the coast) in order to reach bottomhole targets, given the present 13,000-foot limit of extended-reach drilling.

Comment	Response
0182_Lisa.Herbert_FPM_NGO POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 7, 2011 Wedgewood Resort - Taiga Center Fairbanks, Alaska Statement of Support for Alternative B 167 LISA HERBERT: Good evening. My name is Lisa Herbert and I'm Executive Director of the Greater Fairbanks Chamber of Commerce. And I thank you for the opportunity to present testimony on the Draft Environmental Impact Statement for ExxonMobil's Point Thomson natural gas condensate project. I'm here today to speak in favor of Alternative B, as this alternative provides the safest, most environmentally responsible solution for developing Point Thomson's resources in a timely, cost-effective manner. The Fairbanks Chamber represents over 700 businesses and organizations, many here are represented in this room tonight. One of our organization's core values is free enterprise and the Point Thomson project will provide wide-ranging benefits to many of our members in the form of business opportunities, jobs for Alaskans, and revenues. In a time when our nation's facing high unemployment levels, it seems appropriate to move forward on a project that will employ many Alaskans who are highly trained, willing and able to work. The Chamber's number one priority, and of course has been for many years, is reducing the high cost of energy that plagues our residential and business communities. It's stifling our economic development in our area. I would like to emphasize that we became a state only after Congress was convinced that Alaska could support itself economically through development of its vast natural resources.	167 Comment noted; no action required.

Comment	Response
With an estimated eight trillion cubic feet of natural gas and 200 million barrels of condensate, developing Point Thomson is essential to construction of any natural gas pipeline. That would reduce the high cost of energy that we all face in this room today. Furthermore, development of this project will increase throughput in TAPS. ExxonMobil has demonstrated that exploration and development can occur with minimal impact to the environment. And I thank them for their excellent presentation here earlier today. By using long-reach directional drilling technologies from onshore pads to recover offshore resources, Alternative B ensures a minimal environmental footprint with the use of barging, ice roads, aviation and in-field roads. Alternatives other than B, with unnecessary requirements that provide little incremental benefits, should be avoided so that the project can move forward to provide jobs to Alaskans and set the pathway to bring gas to Fairbanks, reducing our energy costs. Responsible resource development can be done in Alaska. It has been done and has been proven. I thank you for your time and for a very comprehensive EIS for us to comment on today.	

Comment	Response
0183_Kevin.Pomeroy_FPM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 7, 2011 Wedgewood Resort - Taiga Center Fairbanks, Alaska Statement of Support for Alternative B 168 KEVIN POMEROY: I'll be brief. My name is Kevin Pomeroy. I recognize more elegant speakers in the audience than myself but, you know, I can't -- picking up where Mr. Lowry left off, I don't think there's anyone in this room, or anyone I can think of, that can halt global warming, can halt coastal erosion and halt the exit of wildlife out of the Refuge. There's a boundary that was set for a reason and what happens outside of that boundary is -- is deemed to be oil and gas development. So that being said, I spent quite a bit of time online and these maps here were quite helpful in being able to see the different proposed alternatives right next to each other. So it just helped kind of solidify my opinion that, well, Alternative B seemed to be the most logical of the alternatives presented. Seems like ExxonMobil has done their homework, their due diligence involving stakeholders that are, you know, could be directly impacted from this. Village of Kaktovik, Nuiqsut, they took public testimony in Anchorage, they're here tonight and seemed like they had a full agenda to get input through all of the planning phases of this project. And I'm sure a lot of that has been taken into account by the Corps of Engineers. So it seemed like, you know, as you take a look at the development over the last several decades	168 Comment noted; no action required.

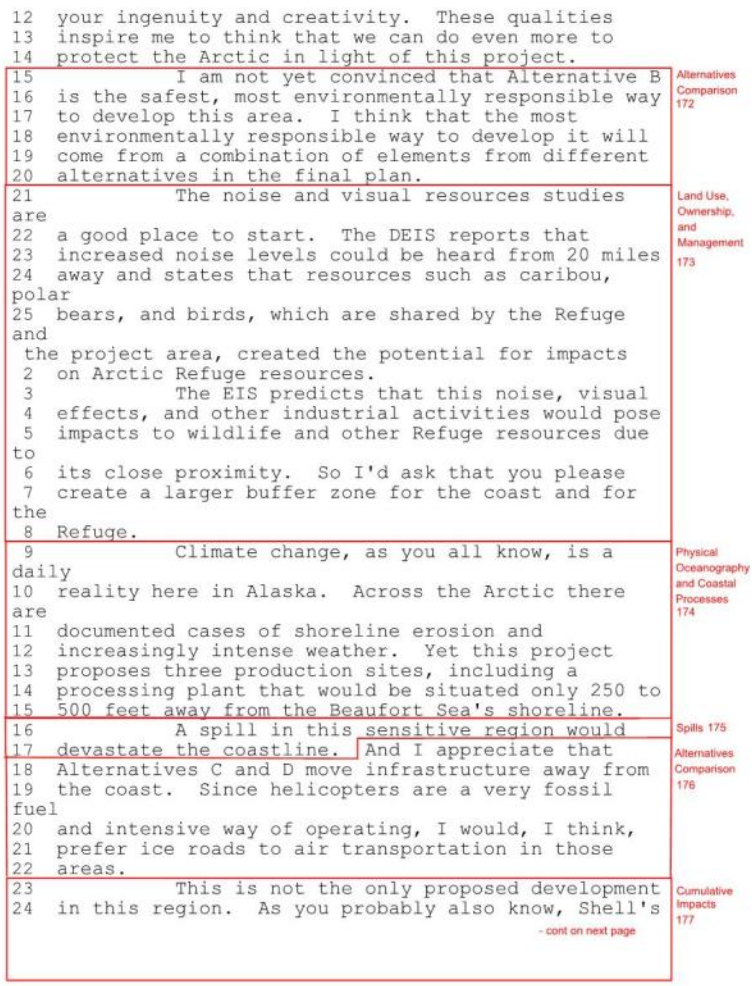
Comment	Response
up on the Slope, we've been able to -- or the producers have been able to responsibly shrink their footprint, minimize and taking into concerns some of the group that, you know, have got environmental concerns. And I'm sure as the technology advances, we'll be able to someday minimize our footprint even more. But of the options presented, in my opinion, I would be in full support of moving forward with Alternative B. Thank you.	

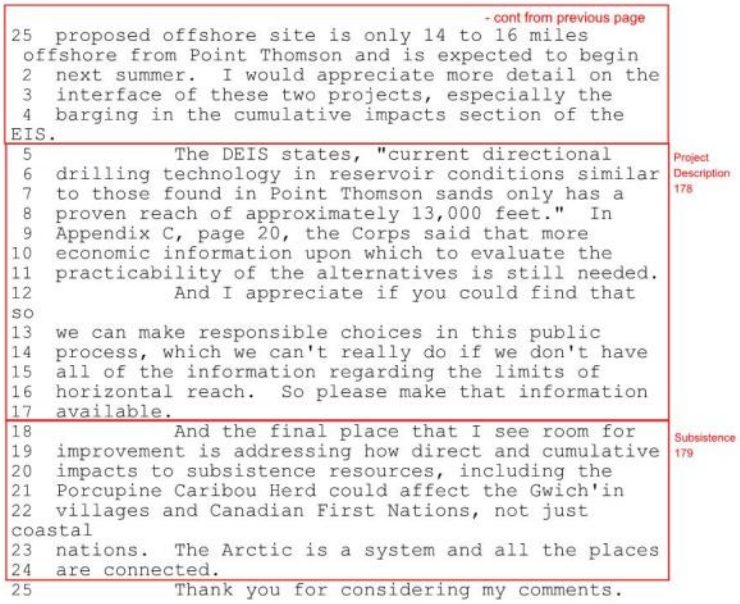
Comment	Response
0184_John.Swortfigeur_FPM_NGO POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 7, 2011 Wedgewood Resort - Taiga Center Fairbanks, Alaska Statement of Support for Alternative B 169 JOHN SWORTFIGUER: Good evening. My name is John Edgar Swortfiguer. I'm here in affiliation with the Laborer's International Union of North America, Local 942, of which I'm a 15 year member. Thank you for this opportunity to voice my support for the implementation of Alternative B, coastal pads with in-field gravel roads for the Point Thomson natural gas condensate development project. It's my strong conviction, based on the Draft Environmental Impact Statement that Alternative B, coastal pads with in-field gravel roads offers the optimum cultural sensitivity and most responsible environmental accountability, while achieving and maintaining the economic viability of the Point Thomson development project. Alternative B ensures that polar bears and other wildlife essential to traditional subsistence lifestyles will be protected by the cooperation and coordination with the U.S. Fish and Wildlife Service and other state agencies. Alternative B allows for a coastal barge route outside the main migration corridor of bowhead whales with close to 200 barging trips relative to the upcoming project already occurring with no impact to marine mammals or subsistence lifestyles. Alternative B creates the smallest environmental footprint and affords features that are the safest and most efficient for conducting operations. Approval of the Point Thomson development	169 Comment noted; no action required.

Comment	Response
project is vital to Alaska and Alaskans. Development of this world-class resource will provide jobs for Alaskans, new revenue to the state and local governments, increased throughput for the Trans Alaska Oil Pipeline and increased business activity and revenue to the private sector, while ensuring protection and respect for traditional subsistence lifestyles and the environment. As a 30-year resident of the great state of Alaska and a proud father of two beautiful daughters of Alaska Native ancestry, I've grown increasingly frustrated and fatigued with the notion that non-development of this state's natural resources is somehow the moral high ground from an environmental standpoint. Nothing could be further from the truth. Allowing these great resources to lie dormant while it's within our reach technologically to develop them, along with implementing the necessary environmental protections and respecting cultural traditions is a forfeiture we can ill afford to endure. Thank you for your time this evening.	

Comment	Response
0185_Jim.Plaquet_FPM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 7, 2011 Wedgewood Resort - Taiga Center Fairbanks, Alaska Statement of Support for Alternative B 170 JIM PLAQUEST: My name is Jim Plaquest. I'm a 38-year member of the International Union of Operating Engineers, Local 302. Of the design alternatives considered, Alternative B provides the safest, most environmentally responsible solution for developing Point Thomson's resources. The petroleum industry is an invaluable component of Alaska's and Fairbanks' economy. With Prudhoe Bay oil reserves in decline, it is essential that new areas be developed. Alternative B ensures a minimal environmental footprint by incorporating a combination of summer coastal barging, winter ice roads, aviation and in-field roads. These features are essential to the project's safe and efficient operations. Point Thomson is a highly technical project with high costs. Unnecessary requirements that provide very little, if any, incremental environmental benefits should be avoided as not to compromise the economic viability of the project. Approval of the Point Thomson project as proposed in Alternative B is vital to the development of this world-class resource and North Slope gas commercialization. Alternative B will provide the needed employment for Fairbanks workers to support their families. The oil industry is a major driver in the Fairbanks economy that many businesses in this town depend on. Thank you for letting me testify.	170 Comment noted; no action required.

Comment	Response
0186_Jenna.Hertz_FPM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 7, 2011 Wedgewood Resort - Taiga Center Fairbanks, Alaska JENNA HERTZ: My name is Jenna Hertz. And this project is of concern to me because, as we've mentioned, it's very close, only two miles from the Arctic National Wildlife Refuge, which is a very important place to me. It's a very big project. It would include: Three production drill sites; the central processing facility would be only 5.5 miles west of the border and located right above the coast; 12 miles of gravel roads; a new mile-long airstrip and staging sites; a major new gravel mine where 2.6 million cubic yards of gravel would be evacuated from 162 acres of tundra wetlands; 282 acres of tundra covered by gravel fill; and a gravel boat ramp and a pier with the dredged area offshore for barge off-loading. These new industrial facilities, like drill rigs, towers, flare stacks, support facilities, air traffic and lighted facilities will be seen across a long viewshed. To contrast that, the coastal plain, the way it is, is flat at this point and treeless and any development this close to the Refuge would be an assault to the wilderness character and values of this incredible piece of the world. So my main message tonight is to thank the Corps of Engineers for the work that you've done in generating that near mountain of a document back on that table and putting together a friendly and helpful public process this evening. I appreciate Arctic Refuge 171	171 The EIS includes a separate resource section on the Arctic Refuge due to its proximity to the project and the Thomson Sand Reservoir. The analysis of impacts to the refuge and the wilderness perception within the refuge is presented in Section 5.14, Arctic National Wildlife Refuge, of the EIS. The Corps will decide on appropriate mitigation to minimize potential impacts from the project.

Comment	Response
	172 The Corps will consider multiple factors, such as impacts to the environment identified during the NEPA process, the project purpose, practicability (as part of the 404[b][1] Guidelines analysis), public interest determination, and mitigation options, when making its permit decision. 173 Modeling of potential noise from the project within the Arctic Refuge predicted very small increases over existing natural conditions within the refuge (up to 20 miles from the western border) and that noise decays with increasing distance from Point Thomson. (See Appendix O, Noise Technical Report and Section 5.20, Noise.) Noise impacts to birds, terrestrial mammals, and polar bears would occur in close proximity to the project, but noise is not anticipated to affect animals within the Arctic Refuge. As noted in Section 5.14, Arctic National Wildlife Refuge, impacts to wildlife and other Arctic Refuge resources were determined to be minor in magnitude, possible or unlikely, and limited in extent. Mitigation measures have been proposed in order to lessen impacts to wildlife resources and habitats within and near the project area and the refuge. The State of Alaska holds title to the project area and land west up to the Arctic Refuge approximately 2 miles away from the Point Thomson Project, including submerged lands under ocean waters up to 3 miles. The state has designated this area for oil and gas development and general public uses (See Figure 3.13.1). No buffer zones have been proposed by the state or federal government for this area, and the Corps does not have legal authority to impose a buffer for the refuge. Mitigation measures have been designed for the Point Thomson Project to minimize potential impacts. 174 The Applicant conducted a coastal engineering assessment (Draft Metocean Design Criteria Study; PND 2009a), which addresses long-term coastal erosion forecasts relative to the project design. Additional information from this report has been added to the discussions of shoreline erosion relative to the Central, East, and West Pads under Section 5.5.3.1, Alternative B: Construction and Operation. Additionally, Figure 5.5-1 has been added to this section to show the historical and projected shoreline changes with time. 175 Comment noted; no action required. 176 Comment noted; no action required. 177 The Draft EIS acknowledged the presence of the offshore development and discussed the cumulative impacts to the extent information on the other projects was known. The Corps was notified by Shell during the Draft EIS comment period of their interest in making use of the Point Thomson export pipeline. Shell also provided the Corps with additional general information regarding their anticipated OCS exploration activities. The additional information provided by Shell has been incorporated into the Chapter 4 description of potential OCS activity. The Corps believes that, even with this additional general information, the cumulative impact discussion in the EIS concerning barging is sufficient, based on best available information.

Comment	Response
	178 The horizontal reach of 13,000 feet is still a valid distance. Information available on drilling technology has not changed since the publishing of the Draft EIS. The appendix referred to (Appendix C) is the Draft Section 404 (b)(1) Guidelines Evaluation. This evaluation is part of the Corps' permit process that is related to, but not the same as this NEPA process. As recommended by CEQ, the Corps has determined that it will not include certain confidential information, such as cost data, in the NEPA process. However, the Corps can use confidential information to inform the 404(b)(1) process, and ultimately the Corps' permit decision. 179 As noted in the Draft EIS, Section 5.10, Terrestrial Mammals, impacts to caribou, regardless of the herd, were determined to be minor to moderate in magnitude and ranged from less than 1 percent of caribou potentially disturbed under Alternatives B and E to 14 percent under Alternative C due to the gravel access road. The impacts under Alternative C would primarily occur in the western portion of the study area and would mainly affect the Central Arctic and Teshekpuk Herds. The Porcupine Caribou Herd is defined as calving east of the Canning River and their overall range typically overlaps with a very small portion of the eastern part of the study area (see Figure 3.10-6). Therefore, impacts to the Porcupine Herd would likely be even less than 1 percent of the herd disturbed. The subsistence impact analysis considered the conclusions of the biological analysis that the project would not result in large scale changes in migration and that impacts would primarily be limited to local in geographic extent. Therefore, the majority of impacts for subsistence users would occur for residents who travel to the project area for caribou hunting and could experience reduced success in that area. According to available data, Kaktovik is the primary community that uses the project area for caribou harvesting activities. The conclusions of the terrestrial mammals impact analysis (Section 5.10) do not indicate that the project would result in changes to the migration of the Porcupine Herd or Central Arctic Herd, and therefore impacts for subsistence users outside the project area, such as those from Nuiqsut, Anaktuvuk Pass, or Arctic Village, would not occur.

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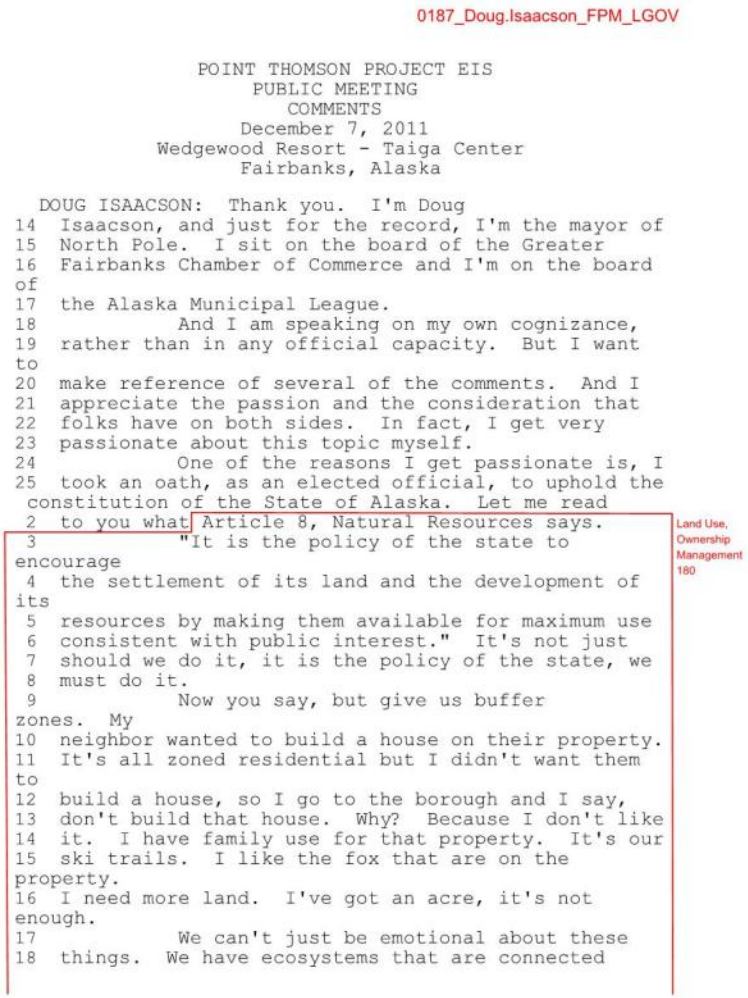	180 There is not a buffer zone around the Refuge, nor has a buffer zone been proposed in the EIS. The EIS includes a separate resource section on the Arctic Refuge due to its proximity to the project and the Thomson Sand Reservoir.

0187_Doug.Isaacson_FPM_LGOV

POINT THOMSON PROJECT EIS
PUBLIC MEETING
COMMENTS
December 7, 2011
Wedgewood Resort - Taiga Center
Fairbanks, Alaska

DOUG ISAACSON: Thank you. I'm Doug Isaacson, and just for the record, I'm the mayor of North Pole. I sit on the board of the Greater Fairbanks Chamber of Commerce and I'm on the board of the Alaska Municipal League.

And I am speaking on my own cognizance, rather than in any official capacity. But I want to make reference of several of the comments. And I appreciate the passion and the consideration that folks have on both sides. In fact, I get very passionate about this topic myself.

One of the reasons I get passionate is, I took an oath, as an elected official, to uphold the constitution of the State of Alaska. Let me read to you what Article 8, Natural Resources says.

"It is the policy of the state to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with public interest." It's not just should we do it, it is the policy of the state, we must do it.

Now you say, but give us buffer zones. My neighbor wanted to build a house on their property. It's all zoned residential but I didn't want them to build a house, so I go to the borough and I say, don't build that house. Why? Because I don't like it. I have family use for that property. It's our ski trails. I like the fox that are on the property. I need more land. I've got an acre, it's not enough.

We can't just be emotional about these things. We have ecosystems that are connected

Land Use, Ownership Management 180

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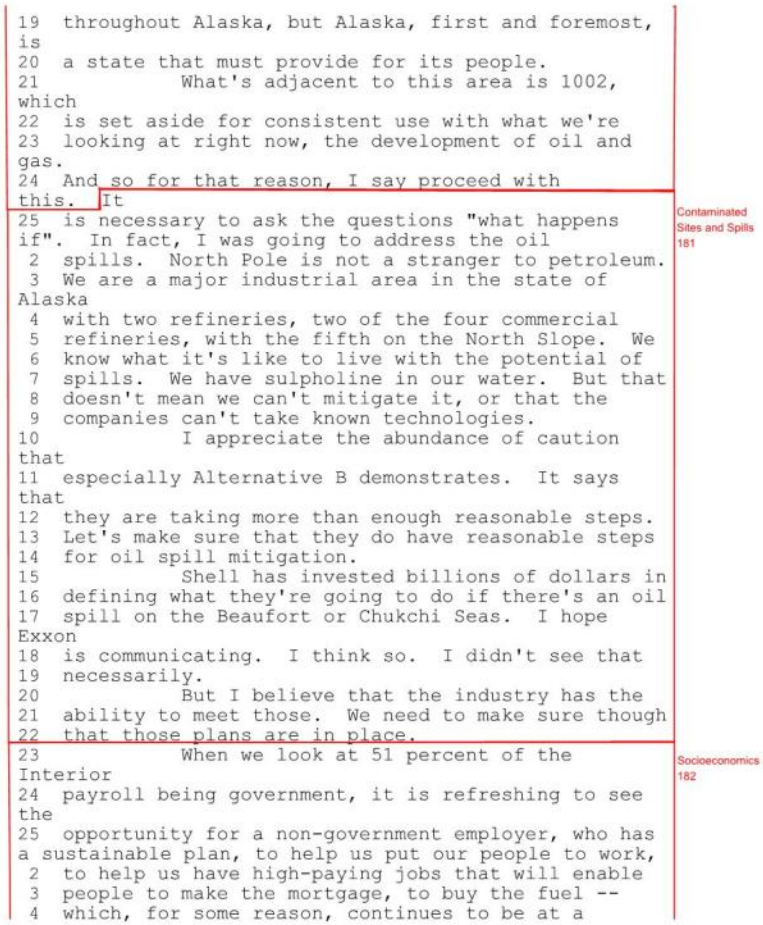
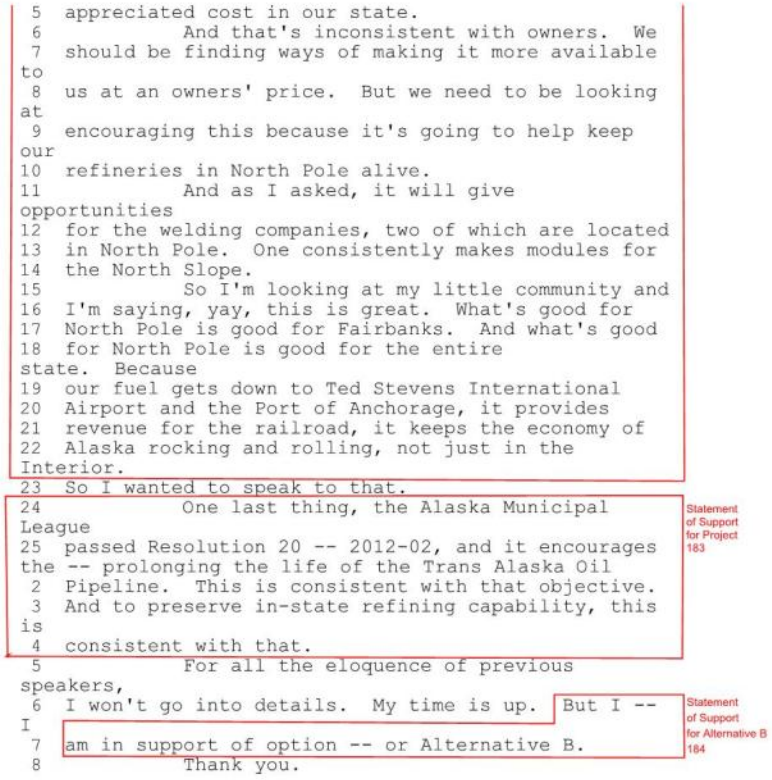
	181 As described in Section 5.24, Spill Risk and Impact Assessment, the Applicant would prepare plans describing spill prevention and response, including an ODPCP, an SPCC Plan, and FRPs. Further, Section 5.24.12, Mitigative Measures, details the measures proposed by the Applicant as part of the project design to prevent and respond to spills. 182 Comment noted; no action required.

19 throughout Alaska, but Alaska, first and foremost, is
20 a state that must provide for its people.
21 What's adjacent to this area is 1002, which
22 is set aside for consistent use with what we're
23 looking at right now, the development of oil and gas.
24 And so for that reason, I say proceed with this. It
25 is necessary to ask the questions "what happens if". In fact, I was going to address the oil
2 spills. North Pole is not a stranger to petroleum.
3 We are a major industrial area in the state of Alaska
4 with two refineries, two of the four commercial
5 refineries, with the fifth on the North Slope. We
6 know what it's like to live with the potential of
7 spills. We have sulpholine in our water. But that
8 doesn't mean we can't mitigate it, or that the
9 companies can't take known technologies.
10 I appreciate the abundance of caution that
11 especially Alternative B demonstrates. It says that
12 they are taking more than enough reasonable steps.
13 Let's make sure that they do have reasonable steps
14 for oil spill mitigation.
15 Shell has invested billions of dollars in
16 defining what they're going to do if there's an oil
17 spill on the Beaufort or Chukchi Seas. I hope Exxon
18 is communicating. I think so. I didn't see that
19 necessarily.
20 But I believe that the industry has the
21 ability to meet those. We need to make sure though
22 that those plans are in place.
23 When we look at 51 percent of the Interior
24 payroll being government, it is refreshing to see the
25 opportunity for a non-government employer, who has a sustainable plan, to help us put our people to work,
2 to help us have high-paying jobs that will enable
3 people to make the mortgage, to buy the fuel --
4 which, for some reason, continues to be at a

Comment	Response
	183 Comment noted; no action required. 184 Comment noted; no action required.

appreciated cost in our state.
And that's inconsistent with owners. We should be finding ways of making it more available to us at an owners' price. But we need to be looking at encouraging this because it's going to help keep our refineries in North Pole alive.
And as I asked, it will give opportunities for the welding companies, two of which are located in North Pole. One consistently makes modules for the North Slope.
So I'm looking at my little community and I'm saying, yay, this is great. What's good for North Pole is good for Fairbanks. And what's good for North Pole is good for the entire state. Because our fuel gets down to Ted Stevens International Airport and the Port of Anchorage, it provides revenue for the railroad, it keeps the economy of Alaska rocking and rolling, not just in the Interior.
So I wanted to speak to that.
One last thing, the Alaska Municipal League passed Resolution 20 -- 2012-02, and it encourages the -- prolonging the life of the Trans Alaska Oil Pipeline. This is consistent with that objective. And to preserve in-state refining capability, this is consistent with that.
For all the eloquence of previous speakers, I won't go into details. My time is up. But I -- I am in support of option -- or Alternative B.
Thank you.

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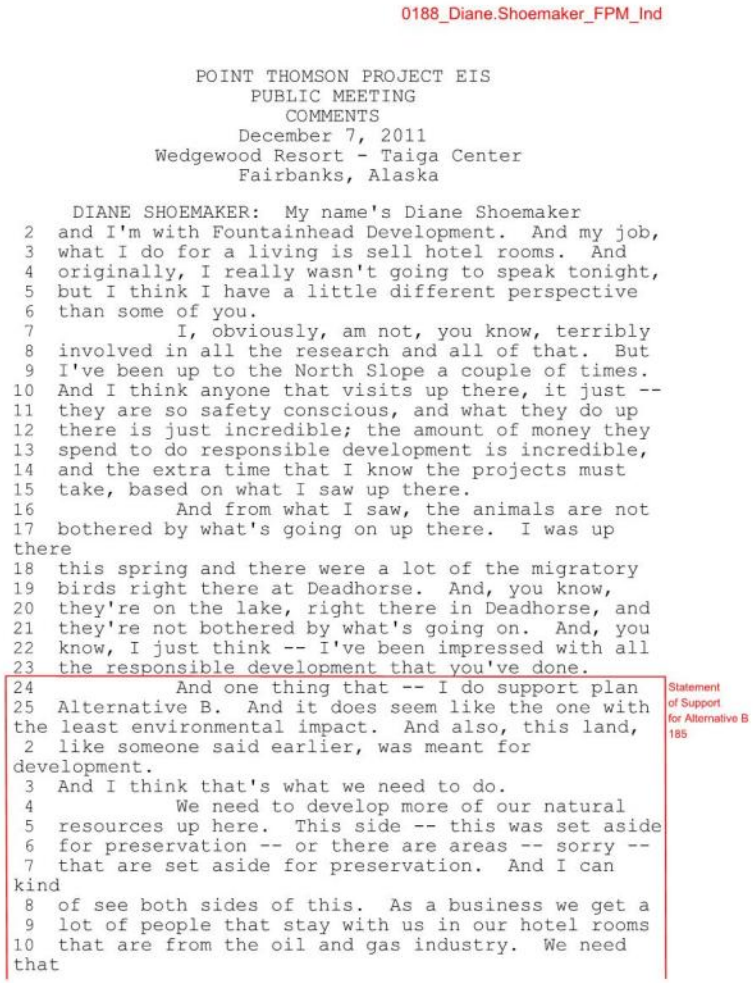
Statement of Support for Alternative B 184

Comment	Response
	185 Comment noted; no action required.

0188_Diane.Shoemaker_FPM_Ind

POINT THOMSON PROJECT EIS
PUBLIC MEETING
COMMENTS
December 7, 2011
Wedgewood Resort - Taiga Center
Fairbanks, Alaska

DIANE SHOEMAKER: My name's Diane Shoemaker and I'm with Fountainhead Development. And my job, what I do for a living is sell hotel rooms. And originally, I really wasn't going to speak tonight, but I think I have a little different perspective than some of you.

I, obviously, am not, you know, terribly involved in all the research and all of that. But I've been up to the North Slope a couple of times. And I think anyone that visits up there, it just -- they are so safety conscious, and what they do up there is just incredible; the amount of money they spend to do responsible development is incredible, and the extra time that I know the projects must take, based on what I saw up there.

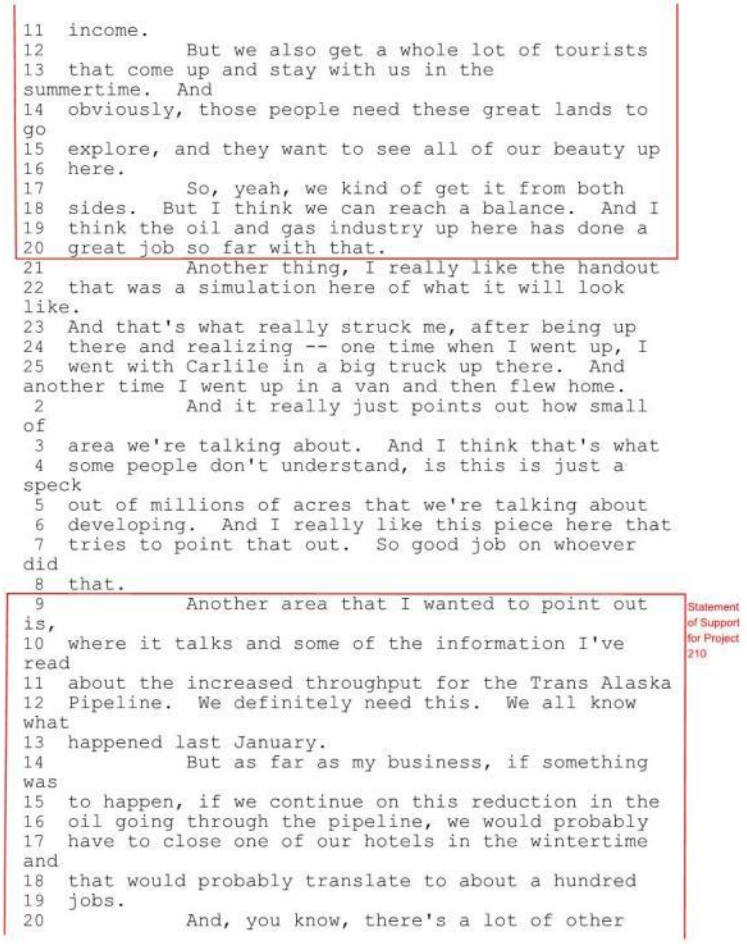
And from what I saw, the animals are not bothered by what's going on up there. I was up there this spring and there were a lot of the migratory birds right there at Deadhorse. And, you know, they're on the lake, right there in Deadhorse, and they're not bothered by what's going on. And, you know, I just think -- I've been impressed with all the responsible development that you've done.

And one thing that -- I do support plan Alternative B. And it does seem like the one with the least environmental impact. And also, this land, like someone said earlier, was meant for development.

And I think that's what we need to do.

We need to develop more of our natural resources up here. This side -- this was set aside for preservation -- or there are areas -- sorry -- that are set aside for preservation. And I can kind of see both sides of this. As a business we get a lot of people that stay with us in our hotel rooms that are from the oil and gas industry. We need that

Statement of Support for Alternative B 185

Comment	Response
	210 Comment noted; no action required.

income.
But we also get a whole lot of tourists that come up and stay with us in the summertime. And obviously, those people need these great lands to go explore, and they want to see all of our beauty up here.
So, yeah, we kind of get it from both sides. But I think we can reach a balance. And I think the oil and gas industry up here has done a great job so far with that.
Another thing, I really like the handout that was a simulation here of what it will look like.
And that's what really struck me, after being up there and realizing -- one time when I went up, I went with Carlile in a big truck up there. And another time I went up in a van and then flew home.
And it really just points out how small of area we're talking about. And I think that's what some people don't understand, is this is just a speck out of millions of acres that we're talking about developing. And I really like this piece here that tries to point that out. So good job on whoever did that.
Another area that I wanted to point out is, where it talks and some of the information I've read about the increased throughput for the Trans Alaska Pipeline. We definitely need this. We all know what happened last January.
But as far as my business, if something was to happen, if we continue on this reduction in the oil going through the pipeline, we would probably have to close one of our hotels in the wintertime and that would probably translate to about a hundred jobs.
And, you know, there's a lot of other

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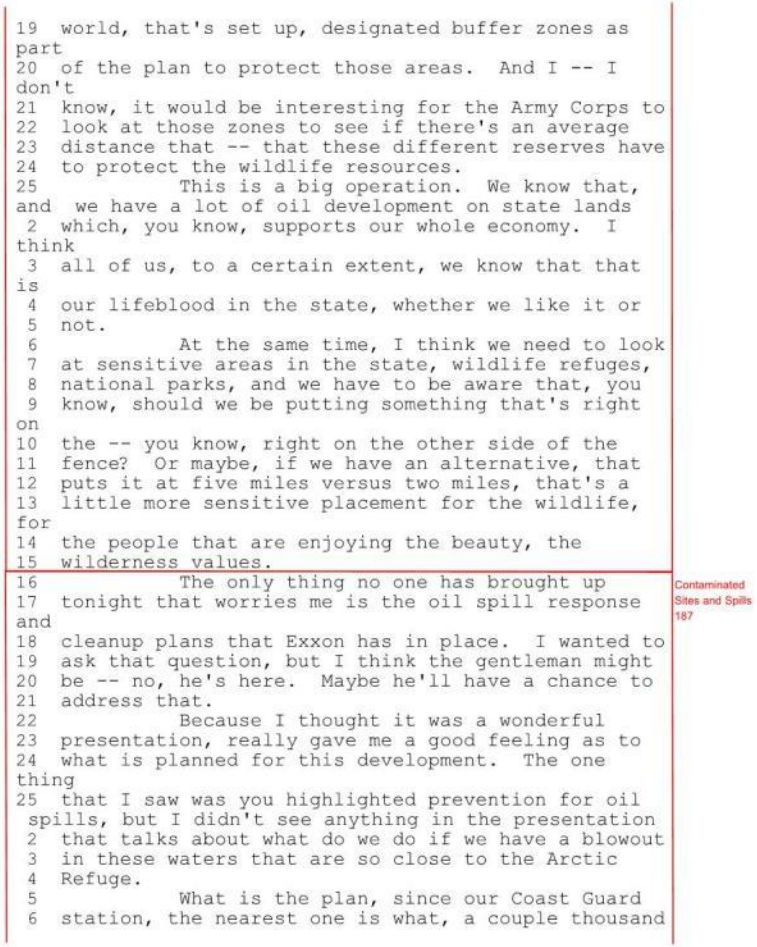
businesses that rely on a lot of business from the oil and gas industry. And that would really affect our town. So, you know, we need to do everything we can to get more gas -- or more oil in the pipeline, and a gas pipeline would be good, too. Another area I wanted to point out was when I was up there in Prudhoe Bay, I just could not believe the care. The one thing that got me is the little oil pan things that you have to put under your truck every time you stop. I don't know if everyone realizes this, you stop your car, you have to get out and put these little cannulas, whatever, oil pan, under your car so that you don't get one little speck of oil on the tundra up there. I just couldn't believe that. And I just think that's such a good example of how far the developers up there go to make sure that they're protecting the environment up there. And I just think that's a good example of the balance. I know there's -- you know, we can do this. They've shown that they're very responsible in developing and we can protect the environment, too. So, thank you.	

Comment	Response
0189_Debbie.Miller_FPM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 7, 2011 Wedgewood Resort - Taiga Center Fairbanks, Alaska DEBBIE MILLER: (Indiscernible) -- written testimony -- (indiscernible). I spent a good portion of the last 40 years exploring the Arctic National Wildlife Refuge. And the one thing that occurs to me is my camping on the Canning River, which is adjacent to this area. And when you're camping out on the coastal plain of the Arctic Refuge, you know, it's this amazing expanse that you look out across the tundra towards the beautiful Romanzof Mountains. It's an extraordinary view when you're out there, especially when you have 50,000 caribou walking right by you. Having a large facility, production facility and drilling rigs and roads and all the noise associated with development, two miles is a pretty close distance to this area. And I would encourage the Army Corps to consider moving the East Pad, or considering that as not the last -- the last of the last of the options for development, because that is so close. The central processing facility would be about what -- five, five and a half miles? And that still is close. But, you know, two miles -- I just went on a two mile walk today on Chena Ridge. It took me about 15, 20 minutes to make this loop, you know. And this is a close distance, particularly because of the expanse, and how noise travels, smells travel, and the impacts to the wildlife, the water fowl, the nesting birds, the caribou, denning polar bears and all that there are in the Arctic Refuge. This is a wildlife refuge and there are a number of biospheres, biosphere reserves around the Alternatives Development and Screening 186	186 It is outside the Corps' jurisdiction to establish land use buffers or boundaries as suggested in this comment. The Corps will consider multiple factors, such as impacts to the Refuge (e.g., noise and visual impacts) identified during the NEPA process, the project purpose, practicability (as part of the 404[b][1] Guidelines analysis), the public interest determination, and mitigation options, when making its permit decision.

Comment	Response
	187 Well blowouts are addressed in Section 5.24.3.5, Well Blowouts and Uncontrolled Releases. Also, the Applicant's Well Control Blowout Contingency Plan (BCP) and training for prevention and response to blowouts are addressed in Section 5.24.12, Mitigative Measures.

world, that's set up, designated buffer zones as part of the plan to protect those areas. And I -- I don't know, it would be interesting for the Army Corps to look at those zones to see if there's an average distance that -- that these different reserves have to protect the wildlife resources.

This is a big operation. We know that, and we have a lot of oil development on state lands which, you know, supports our whole economy. I think all of us, to a certain extent, we know that that is our lifeblood in the state, whether we like it or not.

At the same time, I think we need to look at sensitive areas in the state, wildlife refuges, national parks, and we have to be aware that, you know, should we be putting something that's right on the -- you know, right on the other side of the fence? Or maybe, if we have an alternative, that puts it at five miles versus two miles, that's a little more sensitive placement for the wildlife, for the people that are enjoying the beauty, the wilderness values.

The only thing no one has brought up tonight that worries me is the oil spill response and cleanup plans that Exxon has in place. I wanted to ask that question, but I think the gentleman might be -- no, he's here. Maybe he'll have a chance to address that.

Because I thought it was a wonderful presentation, really gave me a good feeling as to what is planned for this development. The one thing that I saw was you highlighted prevention for oil spills, but I didn't see anything in the presentation that talks about what do we do if we have a blowout in these waters that are so close to the Arctic Refuge.

What is the plan, since our Coast Guard station, the nearest one is what, a couple thousand

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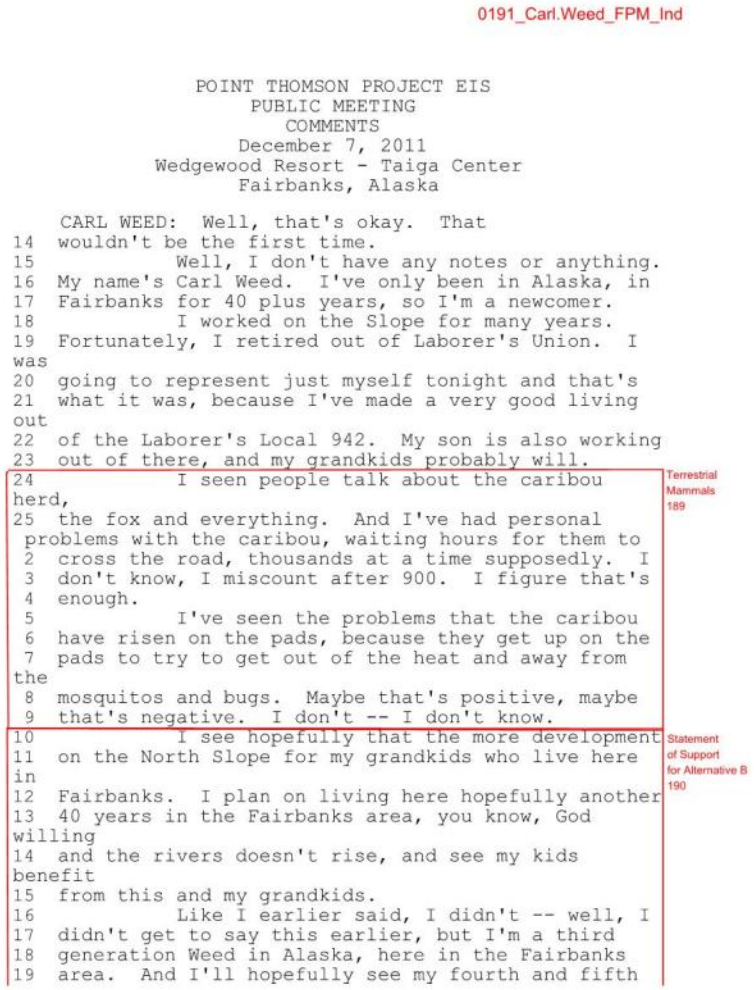
7 miles away by boat? What is the plan for oil spill 8 cleanup and response? I think that's a very 9 important question that I would like to see addressed 10 fully, you know, in the final. 11 Thank you very much.	
0190_Cathy.Jones_FPM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 7, 2011 Wedgewood Resort - Taiga Center Fairbanks, Alaska Statement of Support for Alternative B 188 CATHY JONES: Hi, I'm Cathy Jones. I'm a 11 member of the Local 942. 12 I've been up at Prudhoe for about ten 13 years. I hear things about the environment and 14 everything. And it does have a little bit of an 15 impact on the environment. We do watch, we are 16 cautious. We have sometimes double liners for our 17 trucks so that oil doesn't spill. When it does, we 18 have a spill response there to clean. 19 I'm in support of Alternative B. I also 20 want this for me, myself, for my children. I'm a 21 single parent, I have two kids. In ten years I 22 haven't had to be on Food Stamps, Medicare, or 23 anything like that. I've supported them, had them 24 through braces, medical, you name it. I've done it 25 on my own. So I'm in support of Alternative B.	188 Comment noted; no action required.

Comment	Response
	189 The use of the Point Thomson Project study area by caribou and the potential impacts of the project on caribou (including caribou use of gravel pads and other infrastructure) are discussed in Chapters 3 and 5 of the Draft EIS. 190 Comment noted; no action required.

0191_Carl.Weed_FPM_Ind

POINT THOMSON PROJECT EIS
PUBLIC MEETING
COMMENTS
December 7, 2011
Wedgewood Resort - Taiga Center
Fairbanks, Alaska

CARL WEED: Well, that's okay. That wouldn't be the first time.
Well, I don't have any notes or anything. My name's Carl Weed. I've only been in Alaska, in Fairbanks for 40 plus years, so I'm a newcomer.
I worked on the Slope for many years. Fortunately, I retired out of Laborer's Union. I was going to represent just myself tonight and that's what it was, because I've made a very good living out of the Laborer's Local 942. My son is also working out of there, and my grandkids probably will.
I seen people talk about the caribou herd, the fox and everything. And I've had personal problems with the caribou, waiting hours for them to cross the road, thousands at a time supposedly. I don't know, I miscount after 900. I figure that's enough.
I've seen the problems that the caribou have risen on the pads, because they get up on the pads to try to get out of the heat and away from the mosquitos and bugs. Maybe that's positive, maybe that's negative. I don't -- I don't know.
I see hopefully that the more development on the North Slope for my grandkids who live here in Fairbanks. I plan on living here hopefully another 40 years in the Fairbanks area, you know, God willing and the rivers doesn't rise, and see my kids benefit from this and my grandkids.
Like I earlier said, I didn't -- well, I didn't get to say this earlier, but I'm a third generation Weed in Alaska, here in the Fairbanks area. And I'll hopefully see my fourth and fifth

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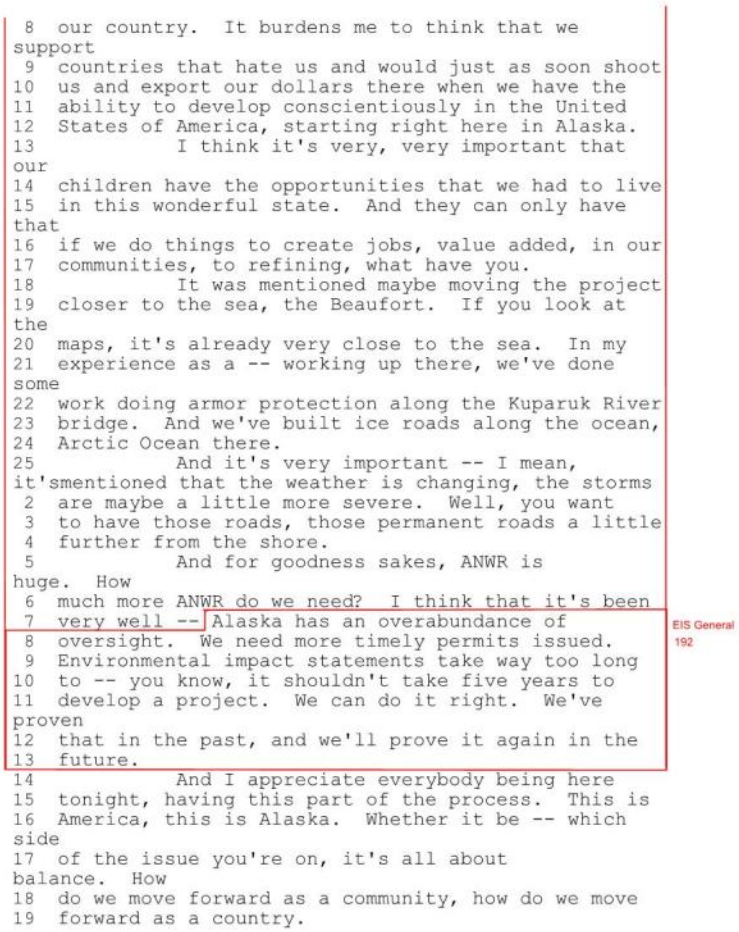
Comment	Response
generation benefit from the oil industry. That's what I've got to say. Alternate B is fine with me. I have no written notes.	

Comment	Response
0192_Buzz.Otis_FPM_NGO POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 7, 2011 Wedgewood Resort - Taiga Center Fairbanks, Alaska BUZZ OTIS: Good evening. Good evening. My name is Buzz Otis. I'm the executive director of North Pole Economic Development Corporation. And I've been in business in the Fairbanks community since May of 1976, and still am in private enterprise. I started a landscaping business in 1976 here. And as you can imagine, landscaping was, you know, really wasn't the first thing to come to mind around this community. Most people are interested in going fishing or hunting or blueberry picking, or something like that. So we, out of necessity, started to get into the earth moving business and over the 30 years I was with the company that I started, we grew into a major civil construction company. In 1975, I worked out of the Laborer's hall; in June, went to Franklin Bluff, spent a year there prior to coming back to town and starting my business. And so I saw the construction of the pipeline, the Trans Alaska Pipeline, as well as the gasline from Prudhoe Bay to Pump 4. And I mention these things because it gives me a sense of balance for what's important, a balance of development and a balance to the environment. I think we've taken good care of the environment in Alaska. I think the oil industry has taken great care. The way they've progressed from 1976 to today, in the realm of safety and in the realm of environmental consciousness is huge. And we are a fossil fuel dependent country and we need these fossil fuels, not only in Alaska, in our pipeline to keep it functional, but also in Statement of Support for Project 191	191 Comment noted; no action required.

Comment	Response
	192 Comment noted; no action required.

our country. It burdens me to think that we support countries that hate us and would just as soon shoot us and export our dollars there when we have the ability to develop conscientiously in the United States of America, starting right here in Alaska.

I think it's very, very important that our children have the opportunities that we had to live in this wonderful state. And they can only have that if we do things to create jobs, value added, in our communities, to refining, what have you.

It was mentioned maybe moving the project closer to the sea, the Beaufort. If you look at the maps, it's already very close to the sea. In my experience as a -- working up there, we've done some work doing armor protection along the Kuparuk River bridge. And we've built ice roads along the ocean, Arctic Ocean there.

And it's very important -- I mean, it'smentioned that the weather is changing, the storms are maybe a little more severe. Well, you want to have those roads, those permanent roads a little further from the shore.

And for goodness sakes, ANWR is huge. How much more ANWR do we need? I think that it's been very well -- Alaska has an overabundance of oversight. We need more timely permits issued. Environmental impact statements take way too long to -- you know, it shouldn't take five years to develop a project. We can do it right. We've proven that in the past, and we'll prove it again in the future.

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And I appreciate everybody being here tonight, having this part of the process. This is America, this is Alaska. Whether it be -- which side of the issue you're on, it's all about balance. How do we move forward as a community, how do we move forward as a country.

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And I applaud ExxonMobil in their efforts to do it right, and the oil industry on doing it right. And I urge people to think about the fact we only have 570 thousand barrels of oil going through the pipe. It's -- compared to two million when we started in 1977, '78, it's a huge reduction. And itcreates problems, it creates problems for refining, and we need a lower cost source of energy to heat our homes. The gas can help us as far as our particulate matter and we can grow this community in a better way. Thank you for listening to me ramble on, and appreciate you being here.	

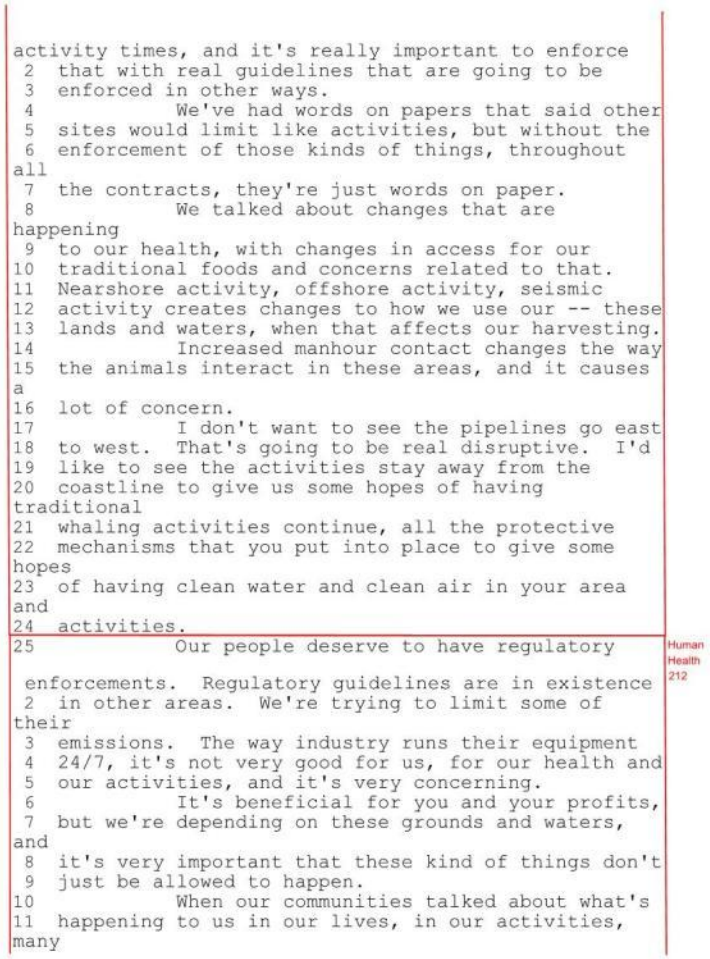
Comment	Response
0193_Amy.Cook_FPM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 7, 2011 Wedgewood Resort - Taiga Center Fairbanks, Alaska Statement of Support for Alternative B 193 AMY COOK: Hi, my name's Amy Cook. I'm a lifelong Alaskan and I work for Carlile Transportation Systems. I'm here to support Alternative B. Alaskans and the state of Alaska depend on the North Slope's hydrocarbon resources. So I support a proposal from one of the world's best project managers to develop at Point Thomson. I support Alternative B because it is ExxonMobil's proposal. Economic activity has been slow to arrive on the eastern North Slope. At this early stage of development, when financial risks are great, the proponent should be allowed to follow the conclusions of its engineering and environmental studies expressed in its development plan. The barge facility seems to be the objectionable piece of Alternative B. But to see this development grow, a barge facility is necessary. A growing development at Point Thomson will continue to provide good jobs to Alaskans. A growing development at Point Thomson will help Badami and bring us closer to commercializing Alaska's stranded gas. Thank you for this opportunity to comment.	193 Comment noted; no action required.

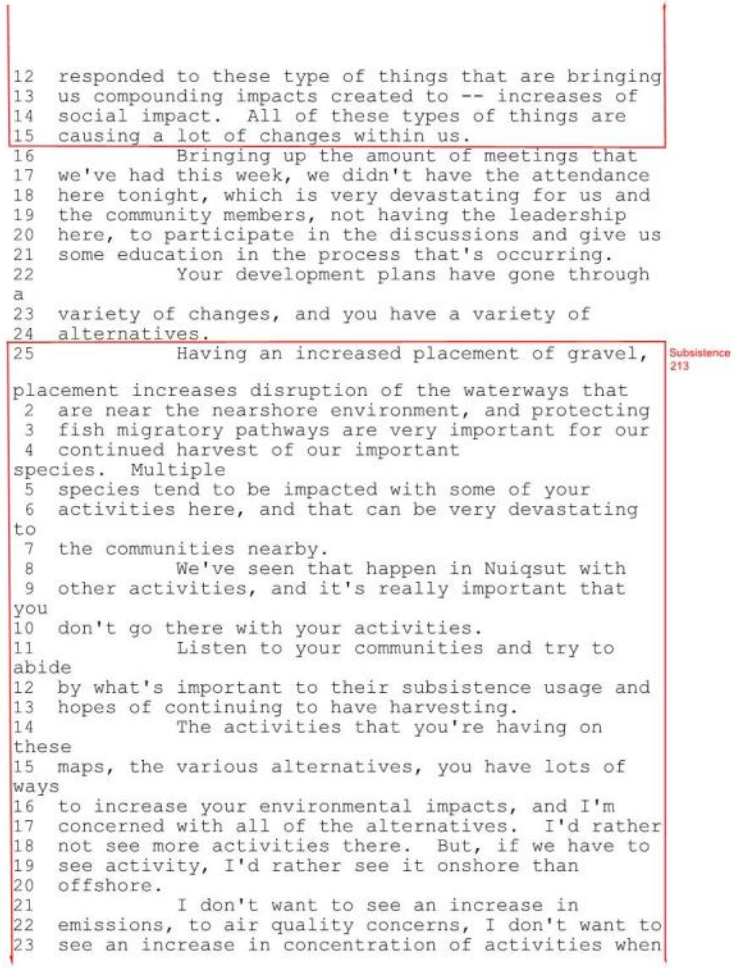
Comment	Response
0194_Vera.Williams_BPM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 15, 2011 Hopson Middle School Barrow, Alaska VERA WILLIAMS: My name is Vera Williams. I work for Inupiat Community of the Arctic Slope as a realty director. And my concern is, on the pipeline itself, if there could be some consideration for the caribou that migrate in the area, and make some caribou crossings and possibly check to see if there's been any studies on the actual migratory areas of the caribou in that area, so that the caribou would not be affected by such a pipeline; if they need to cross somewhere, to make some considerations for caribou crossings. And also, to have a policy for possible areas where hunters in the -- that goes from village to village. Those could be also used for the hunters to cross from one area to the other. So those are areas of concern on the pipeline, if that could be considered on this project. That would be my concern, as a person that does subsistence hunting and that does harvest Native food, not to alter their pathway, but to at least -- to assist them in making them caribou crossings where they would be easily accessable to go from one side of the pipeline to the other. Thank you. Alternatives Development 194 new comment on next page	194 The pipeline design calls for it to be elevated 7 feet off the ground. This design would allow sufficient clearance for wildlife and humans to pass underneath.

Comment	Response
HANK BAIJ: One more time: Anybody else, 25 at all? We can probably take a break from recording VERA WILLIAMS: This is Vera Williams. 4 Under your NEPA section, for Section 106, 5 clearance, do you have any information for the 6 NAGPRA, for possible graves in the area? If 7 people -- if my office could be notified of those, in 8 that section, I'd really like to put some information 9 in that section for the NAGPRA areas. 10 I am researching graves throughout the 11 Arctic Slope area, the whole region, for ICAS, and 12 that would be great information for my knowledge. 13 And, also, since I do work for a Native -- not a 14 Native village, but for Inupiat Community of the 15 Arctic. 16 The Native allotment issue is, there is, 17 you know, jurisdictional boundaries between villages, 18 between Kaktovik and Nuiqsut. And on the Nuiqsut 19 sector, Prudhoe Bay lies right within the Nuiqsut 20 jursidiction. And if these areas -- if -- you know, 21 if they're going to be getting close to Native 22 allotments, I want to make sure that my office is 23 notified, also, in the realty section. Because I do 24 the federal permits, from the -- the tribal side, for 25 the Native allotment owners. And that would be my other concern. 2 I know I did have a call in regards to this 3 project, and there was several Native allotments in 4 the vicinity, but weren't so close that I needed to 5 federal permits from my office. So -- but that 6 dialogue did take place, and I'm appreciative of 7 that; and that, you know, when projects do come, 8 agencies do call our office, and that's very Cultural Resources 195	195 As NAGPRA only applies to federal lands and there are no gravesites identified to date on federal lands, the Corps does not have additional information to provide. However, these types of concerns and resources would be appropriate for inclusion in the Programmatic Agreement that is being developed among consulting parties, including ICAS. To date, there are Native allotments that are in the vicinity of the project, but not directly within the identified project area. Coordination with allotment holders, permitting, and BIA would continue as the project is developed.

Comment	Response
appreciated, coming from the tribal status, for doing the federal permits on our end as a tribal government. And, also, the one concern, the big concern, is just making sure that -- that NAGPRA is -- is something that's very, very important, and that families have graveyards all over the place that are not marked, and if there is any findings of those, I truly would like to know of those. Thank you.	

Comment	Response
0195_Rosemary.Ahtuangaruak_BPM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS Pages 1 - 17, inclusive Commencing at 7:15 p.m. December 15, 2011 Hopson Middle School Barrow, Alaska ROSEMARY AHTUANGARUAK: Hi. My name's Rosemary Ahtuangaruak. I live here in Barrow. I lived for years in Nuiqsut. A meeting process, in relation to these discussions, and what we're facing today, is very different. Early discussions -- (Reporter requested clarification.) ROSEMARY AHTUANGARUAK: There were discussions that said some of these activities would be limited, or there would be efforts to help give us our hope that traditional activities near the coast would continue to occur. A lot of the changes that are showing up on these maps would increase the concentration of activities in this area. In connection to the additional areas here, this would be, and other development of where I'm at -- technically, Endicott -- is more concerning. Having activities with roads and pipes that go east to west is very disrupting to animals that are migrating the coast. Increased concentration of activities near the coastline also are very concerning for us, for the fall whaling activities of our two communities in that area, at Kaktovik and Nuiqsut. We discussed ways of trying to limit activities during the increased subsistence use Subsistence 211	211 The Draft EIS acknowledges that pipelines and roads could cause potential blockage areas for caribou migration and could affect subsistence hunters. The subsistence and traditional land use impact analysis in Section 5.22 of the Draft EIS found that impacts to subsistence hunting would occur, but would be predominantly minor in the project area. Environmental commitments to minimize impacts to wildlife migration and subsistence hunting will be considered during the Corps' development of the final Record of Decision.

Comment	Response
	212 The project would require compliance with numerous health and safety laws and regulations, many of which are described in Appendix F, Laws, Policies, and Plans Applicable to the Point Thomson Project. The Corps recognizes the potential impacts to local communities and culture from the Point Thomson Project and discloses them in the Draft EIS. Among other resources, the Draft EIS analyzes potential impacts to socioeconomic characteristics (Section 5.15), subsistence and traditional land use (Section 5.22), and human health (Section 5.23) and provides mitigation measures that the Applicant proposes to be incorporated into the project design to minimize impacts to the natural and human environment. The cumulative impacts of existing and future North Slope development are also evaluated within each of these resource sections of the EIS.

Comment	Response
 responded to these type of things that are bringing us compounding impacts created to -- increases of social impact. All of these types of things are causing a lot of changes within us. Bringing up the amount of meetings that we've had this week, we didn't have the attendance here tonight, which is very devastating for us and the community members, not having the leadership here, to participate in the discussions and give us some education in the process that's occurring. Your development plans have gone through a variety of changes, and you have a variety of alternatives. Having an increased placement of gravel, placement increases disruption of the waterways that are near the nearshore environment, and protecting fish migratory pathways are very important for our continued harvest of our important species. Multiple species tend to be impacted with some of your activities here, and that can be very devastating to the communities nearby. We've seen that happen in Nuiqsut with other activities, and it's really important that you don't go there with your activities. Listen to your communities and try to abide by what's important to their subsistence usage and hopes of continuing to have harvesting. The activities that you're having on these maps, the various alternatives, you have lots of ways to increase your environmental impacts, and I'm concerned with all of the alternatives. I'd rather not see more activities there. But, if we have to see activity, I'd rather see it onshore than offshore. I don't want to see an increase in emissions, to air quality concerns, I don't want to see an increase in concentration of activities when Subsistence 213	213 The subsistence and traditional land use impact analysis in the EIS (Section 5.22) found that impacts to subsistence hunting would occur, but would be predominantly minor in the project area. As stated in the EIS (Section 5.22.3.2, Cumulative Impacts), past, present, and future projects on the North Slope could impact subsistence in the project area.

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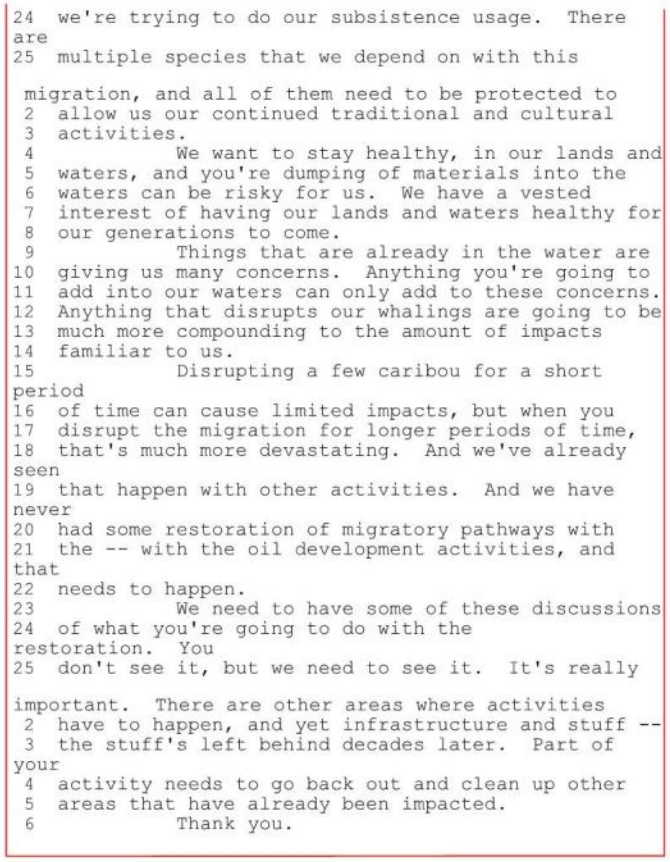
	

we're trying to do our subsistence usage. There are multiple species that we depend on with this migration, and all of them need to be protected to allow us our continued traditional and cultural activities.

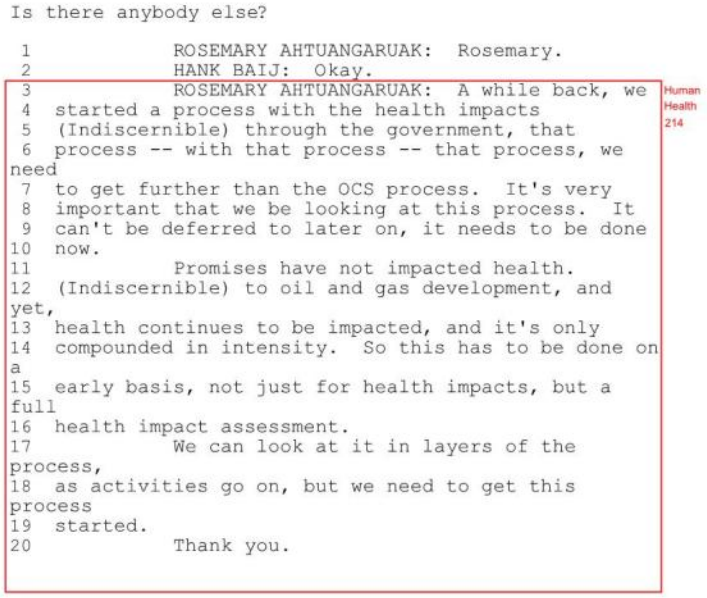
We want to stay healthy, in our lands and waters, and you're dumping of materials into the waters can be risky for us. We have a vested interest of having our lands and waters healthy for our generations to come.

Things that are already in the water are giving us many concerns. Anything you're going to add into our waters can only add to these concerns. Anything that disrupts our whalings are going to be much more compounding to the amount of impacts familiar to us.

Disrupting a few caribou for a short period of time can cause limited impacts, but when you disrupt the migration for longer periods of time, that's much more devastating. And we've already seen that happen with other activities. And we have never had some restoration of migratory pathways with the -- with the oil development activities, and that needs to happen.

We need to have some of these discussions of what you're going to do with the restoration. You don't see it, but we need to see it. It's really important. There are other areas where activities have to happen, and yet infrastructure and stuff -- the stuff's left behind decades later. Part of your activity needs to go back out and clean up other areas that have already been impacted.

Thank you.

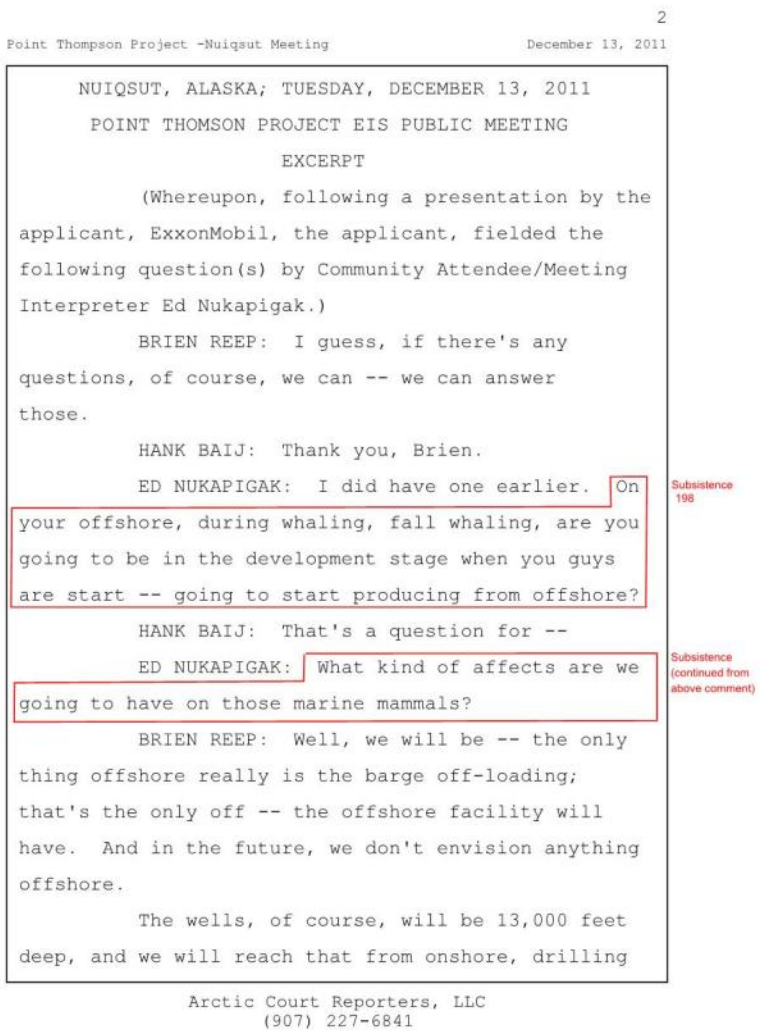
Comment	Response
	214 The State of Alaska Department of Health and Social Services completed a Health Impact Assessment (HIA) for the Point Thomson Project. The overall goal of an HIA is to disclose potential impacts to human health related to a particular action. The HIA is contained in Appendix R and evaluates the health impacts from each alternative in relation to transportation corridors, exposures to hazardous materials, local emergency medical services, continued evolution of subsistence and nutrition behaviors, and psychosocial effects, particularly related to anxiety. The findings of the HIA were considered in the development of Section 5.23, Human Health.

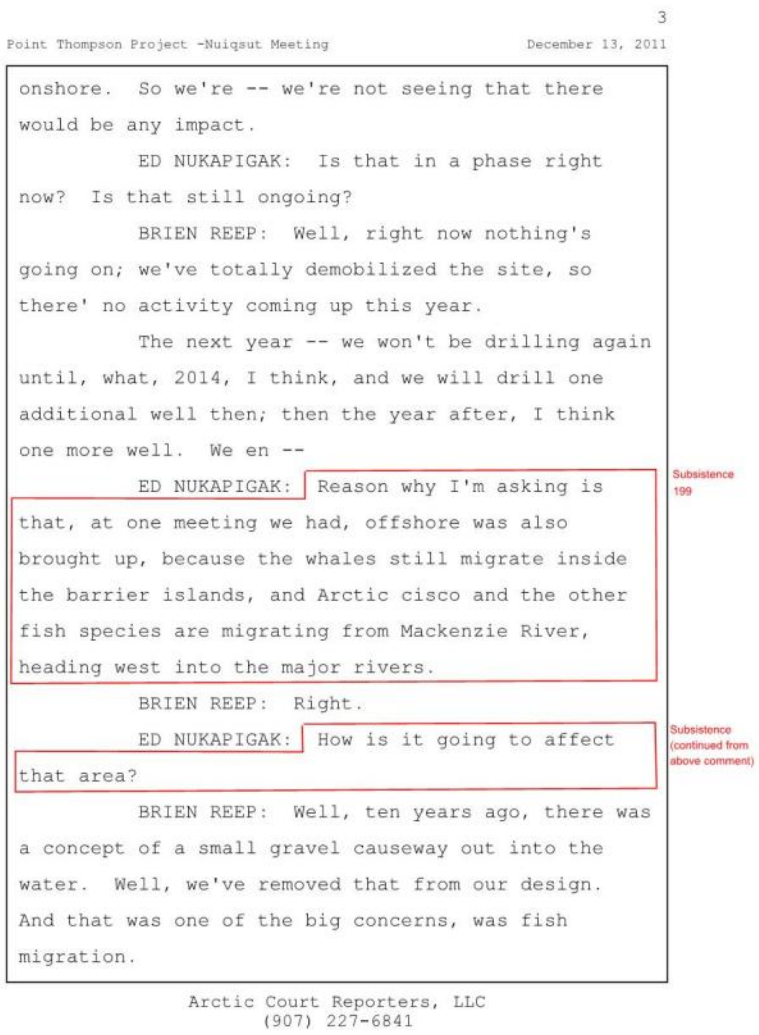
Comment	Response
0196_Forrest.Olemann_BPM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 15, 2011 Hopson Middle School Barrow, Alaska FORREST OLEMANN: Okay, this is the way Human Health 196 it's going to work... Good evening. My name is Forrest Olemann, and the opinions that I'm sharing are mine and -- I'm not going to say -- mine alone. Because over the years I've listened to a lot of our community members express a lot of concern about exploration and development in the geographic areas that are outlined here and all across our coastal home; but one thing that I will say is that over time -- I know this, all these alternatives, didn't fly-by-night. This is something that has been tried over the years and certainly we've learned a lot of things from. Where the one community in the North Slope has experienced more impact than any other community from exploration and development, that's Nuiqsut. So there's a lot of -- there's a lot of knowledge that comes from those kinds of expressions and comments. But what I am here to talk about, and I hope gets carried back to the tables that are going to look for a better solution to helping alleviate impacts. Of course, you have environmental impacts, and that's where most of the focus has been over the last 30 years, the environmental impacts. And only recently did the health impact assessments start to become a focal point. And what I'm interested in is making sure	196 The Draft EIS contains an analysis of impacts to socioeconomics (Section 5.15) which considers the social and economic effects of the Point Thomson Project on the local communities and the North Slope. Future projects are also considered in this analysis in the cumulative impacts section (Section 5.15.8). In addition, impacts to subsistence and traditional land use are analyzed in Section 5.22. The State of Alaska Department of Health and Social Services has also undertaken an HIA for the Point Thomson Project. The State's HIA is contained in Appendix R and evaluates the health impacts from each alternative in relation to transportation corridors, exposures to hazardous materials, local emergency medical services, continued evolution of subsistence and nutrition behaviors, and psychosocial effects, particularly related to anxiety. The HIA was used in the development of Section 5.23, Human Health, in the EIS.

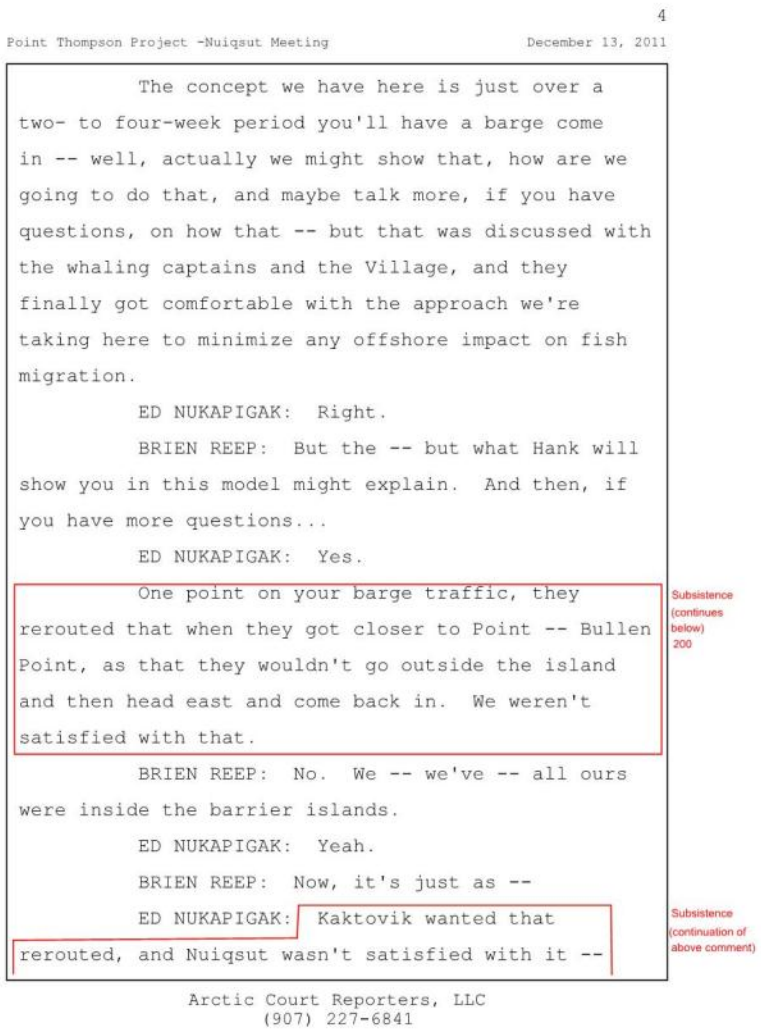
Comment	Response
that the governmental agencies working with the industrial sector take into consideration the social impact and an assessment of whatever baseline studies that need to occur. For so many decades, we've had the industrial development of these billion-dollar corporations come in and extract, and when they're done, there's nothing left for the people that are impacted all around in the geographic area. And, you know, the state certainly benefits from all the exploration and activity that's going on. The federal government certainly benefits, and, to some degree, the local North Slope Borough government, as it pertains to life, health and safety. But anything outside that arena, where a lot of the social impact is felt deeply, there is nothing. And I think we need to do a better job in addressing those areas, where federal and state and the industrial entities come together and partner in addressing the social impacts that are felt throughout -- throughout the geographic area. It's not just Kaktovik or Nuiqsut or Barrow or Wain -- it's -- it's everyone that lives within that region. Because all these communities are interconnected, in one way, shape or form. So I would urge the federal agencies and the state agencies and the industrial sector to start paying more attention to the social impact assessments, because I think, by default, the environmental impacts, there's no way around -- there are no shortcuts anymore. The federal government, I think, is doing a real good job, along with the state government, doing a real good job, to look out for what's best for the	

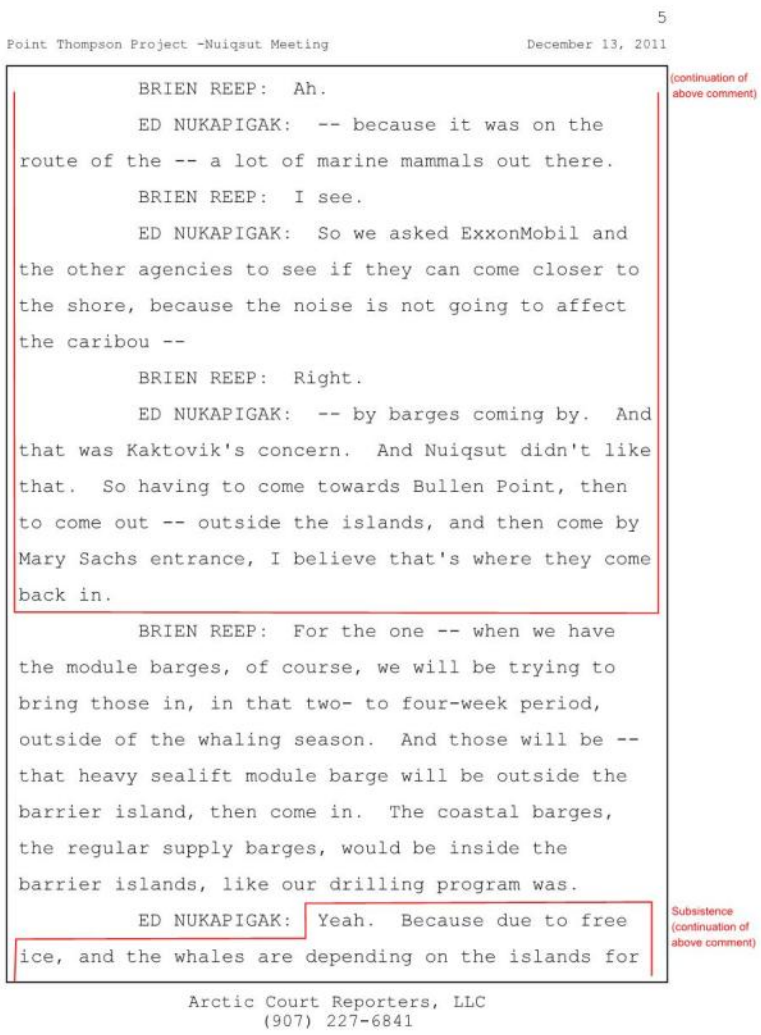
Comment	Response
environment. And it's always been my belief that if the industrial sector comes in and puts up pads or pipelines, or any kind of infrastructure that's put on the land, that when they're done, that land has to be the same way it was arrived at. And I think that there's guidelines and principles that support that. But what I really want to see come out of future assessments is a clear-cut line as to how are we going to address the health and social impacts of those communities that are more affected than those that are out of sight, out of mind. Thank you.	
0197_Ernest.Nageak_BPM_Ind POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS December 15, 2011 Hopson Middle School Barrow, Alaska ERNEST NAGEAK: Ernest Nageak. Birds 197 I seen the list of the impacts to animals and land. I didn't see the migratory birds on there. Tons of birds come here for nesting. And being in Barrow, we have machines that we data'd birds that had their feather -- eider -- inspected for eider; and the Yellow-billed Loon. I think there should be studies on those birds in that area, and they should be on the impacted list. Thank you.	197 Bird studies were conducted specifically for the Point Thomson Project, including surveys for spectacled and Steller's eiders and yellow-billed loons. These studies were conducted by the Applicant and were provided to the Corps for use in preparing the EIS. These studies and others were used in describing the affected environment for birds (Section 3.9 of the Draft EIS) and evaluating the potential impacts of the project on birds (Section 5.9 of The Draft EIS). Birds were not included in the Executive Summary of the Draft EIS because the impacts to birds were not high relative to other resources evaluated, and they did not provide substantive differentiation among the alternatives.

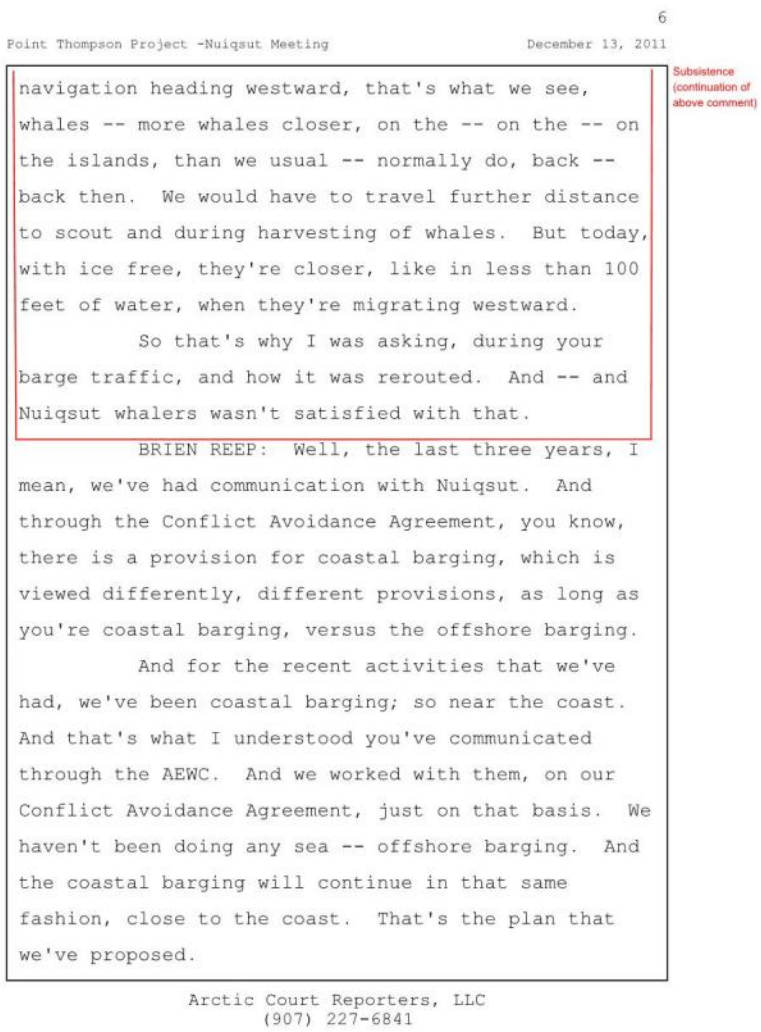
Comment	Response
0198_Ed.Nukapigak_NPM_Ind Point Thompson Project -Nuiqsut Meeting December 13, 2011 POINT THOMSON PROJECT EIS PUBLIC MEETING COMMENTS Pages 1 - 15, inclusive Commencing at 6:30 p.m. December 13, 2011 Nuiqsut Trapper School Nuiqsut, Alaska Arctic Court Reporters, LLC (907) 227-6841	

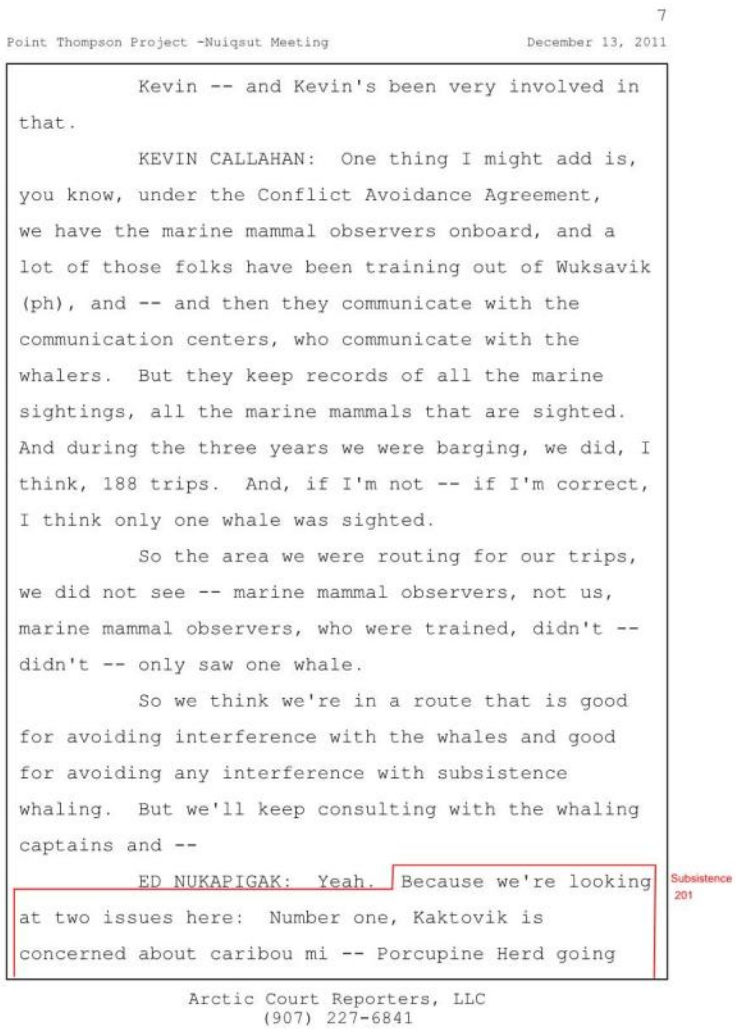
Comment	Response
	198 The project would not involve offshore production. Barging activities would be coordinated with the Conflict Avoidance Agreement to avoid impacts to marine mammals.

Comment	Response
	199 The project would not involve offshore production. Barging activities would be coordinated with the Conflict Avoidance Agreement to avoid impacts to marine mammals.

Comment	Response
	200 The Conflict Avoidance Agreement provides for coordination among the parties to the agreement (AEWC and oil and gas participants) for communication during the open water season and pre- and post-season meetings to discuss planned operations, review the results of the current season's operations, and to discuss any concerns the villages may have. The Applicant has participated in the Conflict Avoidance Agreement in the past and intends to continue their participation in the future in order to protect subsistence whale hunting. Implementing applicable protective measures of the Conflict Avoidance Agreement is listed in the EIS (Section 5.22.2, Environmental Commitments) as an environmental commitment by the Applicant.

Comment	Response
	

Comment	Response
	

Comment	Response
	201 Regarding the Porcupine Caribou Herd, see the response to Comment 179 in Comment Document 186. Regarding marine mammals, the commenter is referring to an operator that may not have participated in the Conflict Avoidance Agreement, not the Applicant or an aspect of this project. The Applicant has participated in the Conflict Avoidance Agreement in the past and intends to continue its participation in the future in order to protect subsistence whale hunting.

7
Point Thompson Project -Nuiqsut Meeting December 13, 2011

Kevin -- and Kevin's been very involved in that.

KEVIN CALLAHAN: One thing I might add is, you know, under the Conflict Avoidance Agreement, we have the marine mammal observers onboard, and a lot of those folks have been training out of Wuksavik (ph), and -- and then they communicate with the communication centers, who communicate with the whalers. But they keep records of all the marine sightings, all the marine mammals that are sighted. And during the three years we were barging, we did, I think, 188 trips. And, if I'm not -- if I'm correct, I think only one whale was sighted.

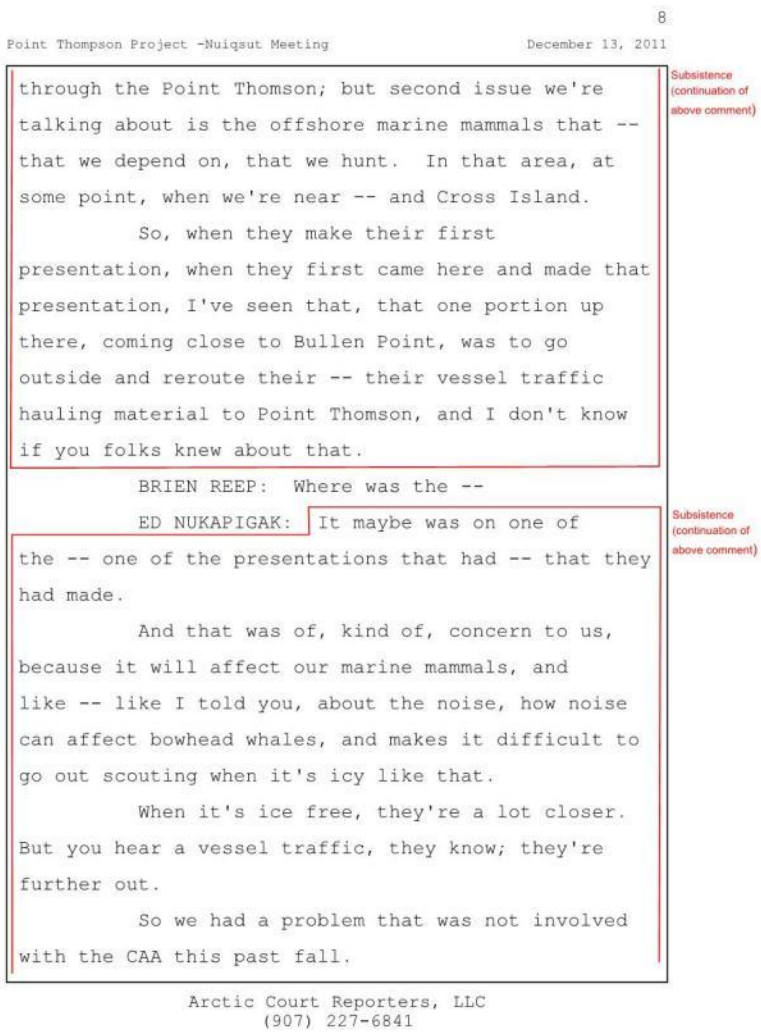
So the area we were routing for our trips, we did not see -- marine mammal observers, not us, marine mammal observers, who were trained, didn't -- didn't -- only saw one whale.

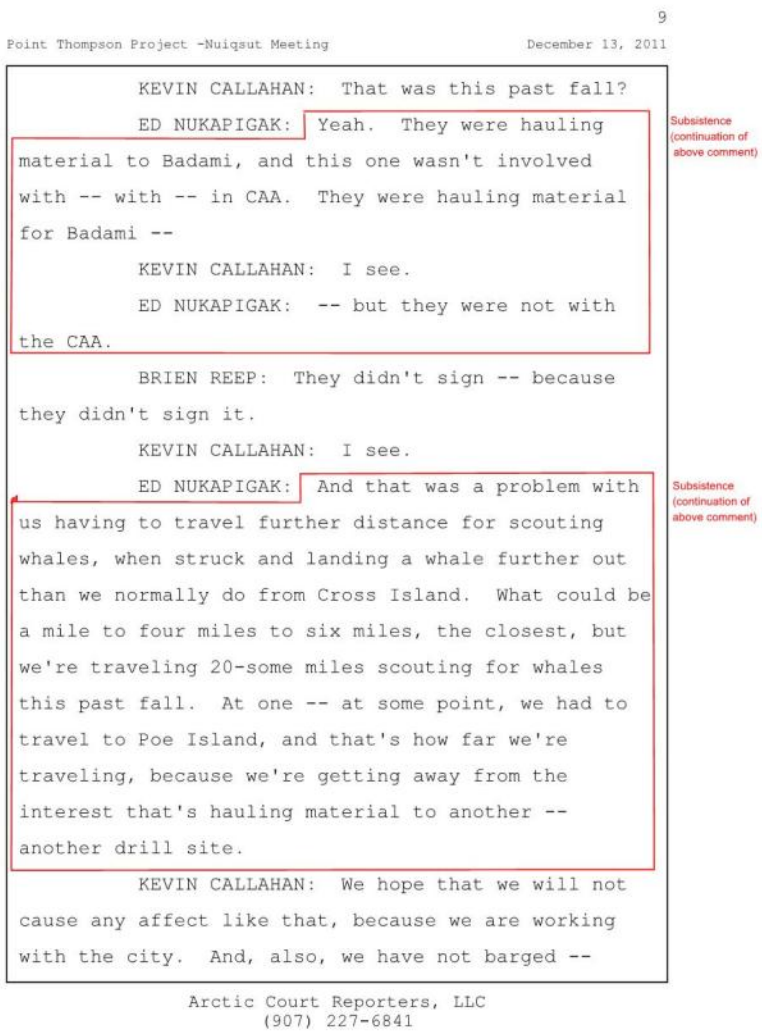
So we think we're in a route that is good for avoiding interference with the whales and good for avoiding any interference with subsistence whaling. But we'll keep consulting with the whaling captains and --

ED NUKAPIGAK: Yeah. Because we're looking at two issues here: Number one, Kaktovik is concerned about caribou mi -- Porcupine Herd going

Subsistence 201

Arctic Court Reporters, LLC
(907) 227-6841

Comment	Response
	

Comment	Response
	

KEVIN CALLAHAN: That was this past fall?

ED NUKAPIGAK: Yeah. They were hauling material to Badami, and this one wasn't involved with -- with -- in CAA. They were hauling material for Badami --

Subsistence (continuation of above comment)

KEVIN CALLAHAN: I see.

ED NUKAPIGAK: -- but they were not with the CAA.

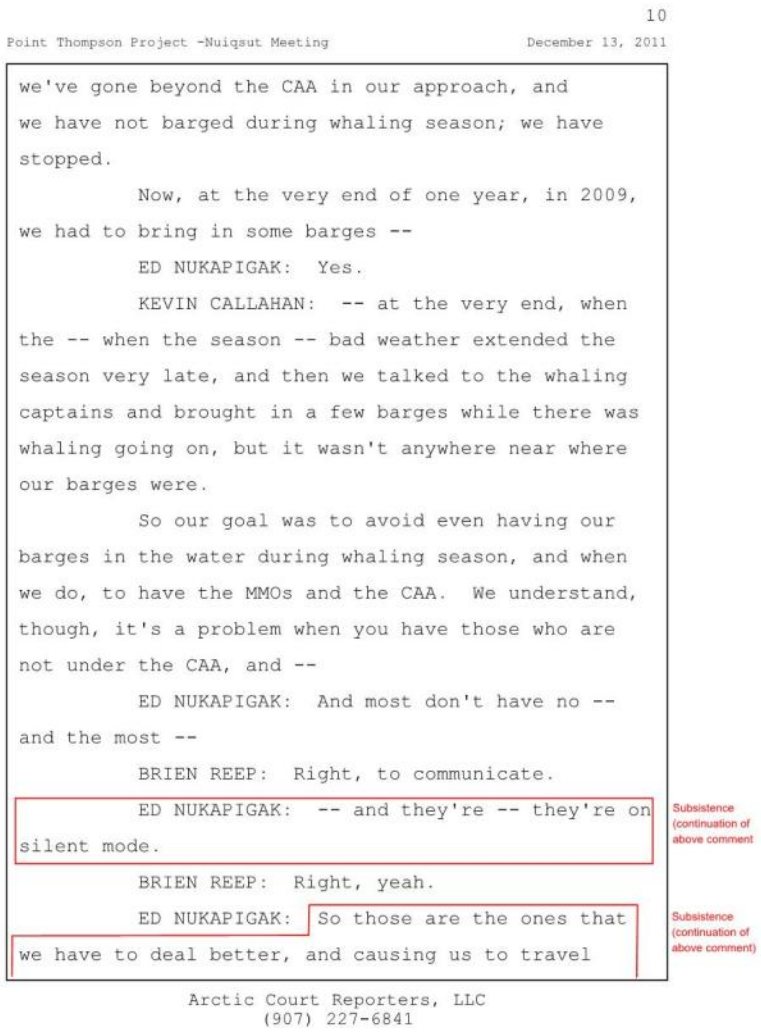
BRIEN REEP: They didn't sign -- because they didn't sign it.

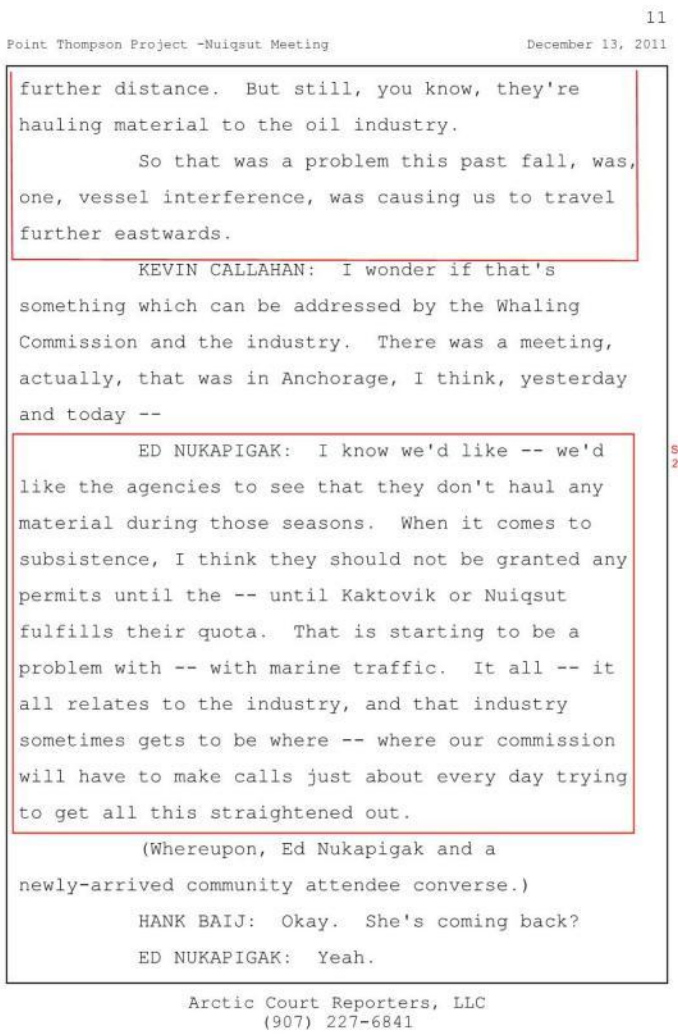
KEVIN CALLAHAN: I see.

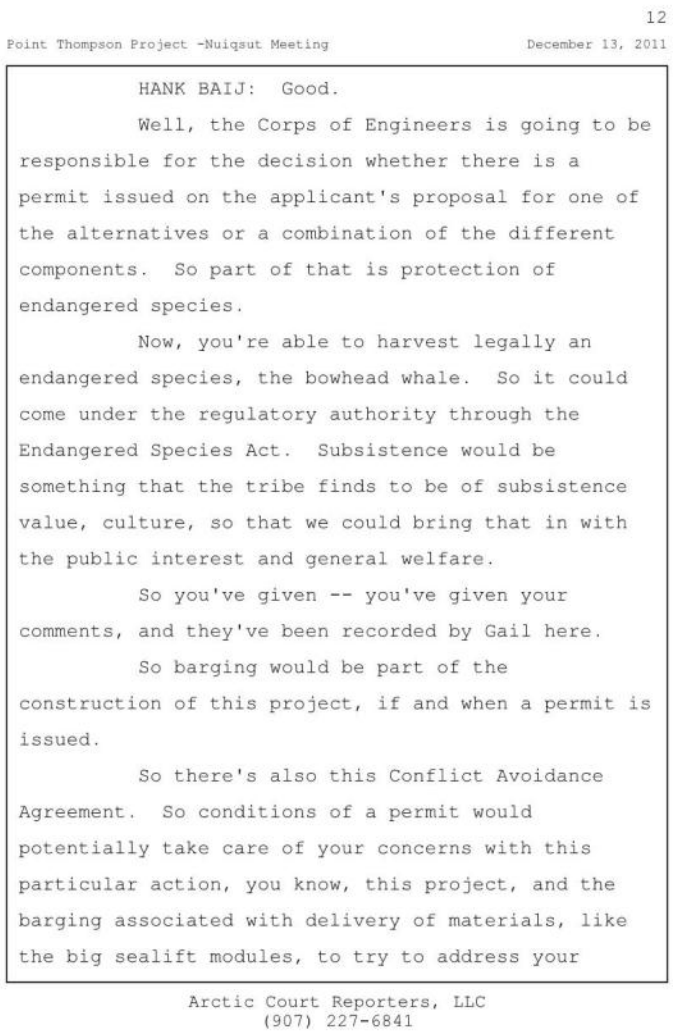
ED NUKAPIGAK: And that was a problem with us having to travel further distance for scouting whales, when struck and landing a whale further out than we normally do from Cross Island. What could be a mile to four miles to six miles, the closest, but we're traveling 20-some miles scouting for whales this past fall. At one -- at some point, we had to travel to Poe Island, and that's how far we're traveling, because we're getting away from the interest that's hauling material to another -- another drill site.

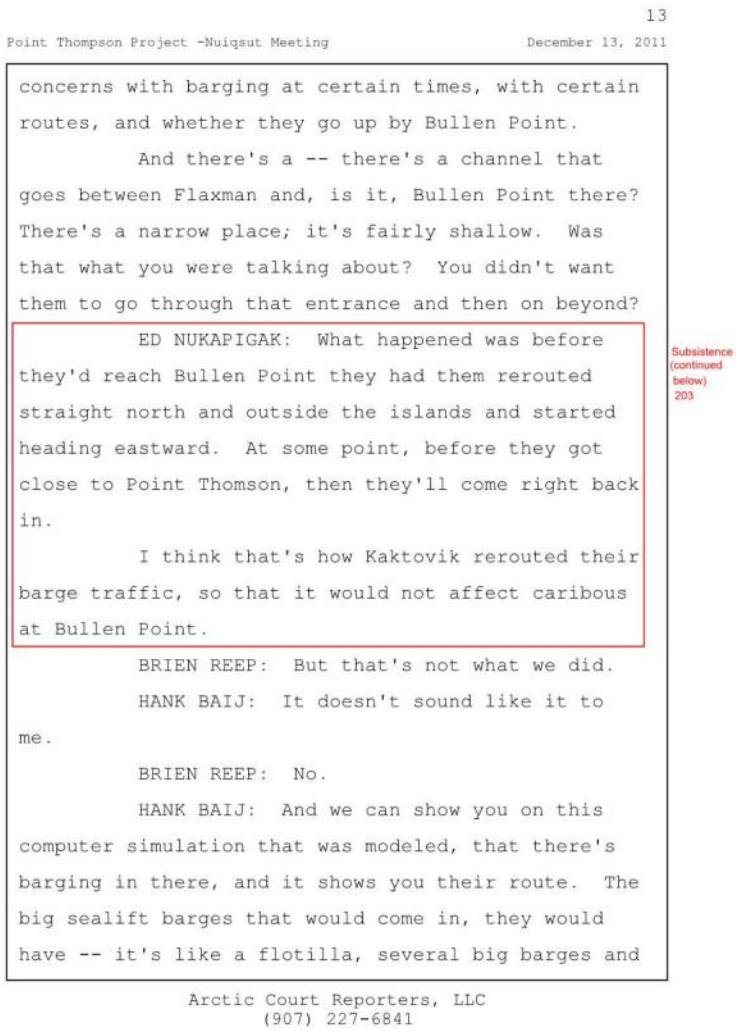
Subsistence (continuation of above comment)

KEVIN CALLAHAN: We hope that we will not cause any affect like that, because we are working with the city. And, also, we have not barged --

Comment	Response
	

Comment	Response
	202 The Applicant has committed to ongoing participation in the Conflict Avoidance Agreement to protect subsistence whale hunting. Establishment of requirements within the Conflict Avoidance Agreement are outside the purview of the Corps.

Comment	Response
	

Comment	Response
	203 See response to Comment 200 in Comment Document 198.

Comment	Response

tugs.

ED NUKAPIGAK: Yes. That's one of the --

HANK BAIJ: And, also, the coastal barging is different -- they would hug the coast more -- for a small -- you know, like those containers, containers and equipment and supplies; that would be a different route.

ED NUKAPIGAK: Yeah. And one of their employees told me, "Do you like this route?" "No." "We don't like it either." And they must have re-modified their barge traffic there.

Subsistence (continuation of above comment)

BRIEN REEP: Yeah.

HANK BAIJ: I'm thinking that that happened, but I haven't been involved with development of the --

BRIEN REEP: We meet every --

HANK BAIJ: -- Conflict Avoidance Agreement.

BRIEN REEP: -- every season.

KEVIN CALLAHAN: We did modify our barge route and moved it closer to the coast, because we were requested by the captains at Kaktovik to do that. We did that a couple years ago.

(Whereupon, the meeting excerpt was concluded.)

Comment	Response
Davis, Cecile 0199_Scott.Thorson_Ind **Sent:** Wednesday, January 04, 2012 4:38 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Scott Thorson Email: scott@nbsys.com Address: 1161 Briggs Court City: Anchorage State: AK Zip: 99516 Contact Phone: Statement of Support for Alternative B 204 Comments: I am writing to comment on the Point Thomson Project Draft Environmental Impact Statement. I strongly support Alternative B. Here are my thoughts on this project. As a former airline pilot in Alaska, I can tell you without doubt, the longer runway found under Alternative B provides better access in bad weather. It also reduces the number of flights by allowing larger aircraft for routine cargo shipments and allows for aircraft to transport larger equipment capabilities in the event of an emergency. This is a very important piece of the entire project. Alternative B would create a minimal environmental footprint by incorporating a combination of summer coastal barging, winter ice roads, aviation, and in-field roads. These features are essential to the project's safe and efficient operations. Last, this project will provide many benefits to Alaska in the form of new business opportunities, jobs, and revenues. As a small business owner, this is critical for the ongoing viability of Alaska's economy. Approval of the Point Thomson project, as proposed in Alternative B, is critical to North Slope gas commercialization and other development opportunities. Some of the direct benefits to the State of Alaska from Point Thomson include training and jobs for Alaskans, new revenues to the state and local governments, increased throughput for the Trans-Alaska oil pipeline, and increased business activity and revenue for the private sector. Please approve Alternative B. Sincerely, Scott Thorson 1	204 Comment noted; no action required.

Comment	Response
0200_Pamela.Bergmann_FGOV United States Department of the Interior OFFICE OF THE SECRETARY Office of Environmental Policy and Compliance 1689 C Street, Room 119 Anchorage, Alaska 99501-5126 9043.1 PEP/ANC ER 11/1071 January 5, 2012 Harry A. Baij, Jr. Department of the Army U.S. Army Engineer District, Alaska Regulatory Division P.O. Box 6898 JBER, Alaska 99506-0898 Dear Mr. Baij: The U.S. Department of the Interior (Department) has reviewed the November 2011 Point Thomson Project Draft Environmental Impact Statement (EIS) for the proposed development by Exxon Mobil Corporation and PTE Pipeline LLC. Department comments on the subject document are made in accordance with the National Environmental Policy Act and the National Historic Preservation Act. It should be noted that any comments the Department's Fish and Wildlife Service (FWS) may have on this Draft EIS will be submitted to the U.S. Army Corps of Engineers by the FWS under separate cover in accordance with their role as a Cooperating Agency for the EIS. The Department would also like to note that the Draft EIS includes within the project area, the Leffingwell Camp National Historic Landmark (NHL), which is located on Flaxman Island. Our review suggests that while proposed project activities generally appear to be on the mainland, the map titled "North Slope Alaska Vicinity Map" shows Flaxman Island within an "Oil and Gas Unit." Based on the information provided, the NHL does not appear impacted by the project. However, if that is not the case, we recommend you contact Janet Clemens (NHL Historian, National Park Service-Alaska Regional Office via phone at 907-644-3461 or via email at janet_clemens@nps.gov) for additional information regarding the NHL. We believe the Final EIS should specifically address and clarify this point. Cultural Resources 205 We appreciate the opportunity to provide comments on this document. If you have questions regarding our comments, please feel free to contact me at via phone at 907-271-5011 or via email at pamela_bergmann@ios.doi.gov. Sincerely, Pamela Bergmann Regional Environmental Officer – Alaska	205 The Leffingwell Camp National Historic Landmark (NHL) located on Flaxman Island would not be impacted by the proposed project. Should the project design change to affect Flaxman Island, the Corps will coordinate with the National Park Service, State Historic Preservation Officer, and consulting parties to identify and manage any potential effects to the NHL.

Comment	Response
Davis, Cecile 0201_Cynthia.Allen_Ind **Sent:** Thursday, January 05, 2012 8:25 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Cynthia Allen Email: cyaln04@yahoo.com Address: 3902 W 86th Ave City: Anchorage State: AK Zip: 99502 Statement of Support for Alternative B 206 Contact Phone: Comments: I am writing to express my support for the ExxonMobil plan for coastal pads with in-field gravel roads. It has been determined that Point Thomson potentially represents around 25% of the North Slope's current known natural gas resource. It would be abysmally foolish to limit development of such an expansive gas field. Plan B has been designed to provide the most environmentally safe development; the benefit is well worth the minimal environmental risk, not only for Alaska, but the entire nation. This project has been thoroughly assessed and there is no need for further delay in the approval of this vital work. 1	206 Comment noted; no action required.

Comment	Response
Davis, Cecile 0202_Bret.Helms_IND **Sent:** Thursday, January 05, 2012 2:42 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Bret Email: Helms Address: 770 Bennett Rd. City: Fairbanks State: AK Zip: 99712 Contact Phone: 907-456-2349 Add me to mailing list: Yes Comments: To Whom It May Concern: Statement of Support for Alternative B 207 My name is Bret Helms and I am the Training director for the United Association of Plumbers & Pipefitters Local 375. I was born and raised in Fairbanks and have worked many years in oil field construction and maintenance. The development of Point Thomson is vital for Alaska's economy, especially at a time when throughput is declining. Development of the field will provide training opportunities and future jobs for the existing workforce that resides in Alaska. I am writing in support of Alternate B for the following reasons: • Alternative B provides a minimal environmental footprint by including a number of essentials required for safe and efficient operation. • Exxon has worked with the U.S. Fish and Wildlife Service and state agencies to ensure protection of wildlife with minimal impact. • The infield roads proposed are routed to minimize the gravel footprint and maximize efficient water drainage. • Alternatives C & D incorporate unnecessary challenges and the elimination of summer barging will increase costs and tundra travel. • Unnecessary requirements that provide little, if any environmental benefit should be avoided with the complexities of project such as Point Thomson. Thank you, Bret Helms 1	207 Comment noted; no action required.

Comment	Response
0203_Judy.Patrick_Ind Sent: Friday, January 06, 2012 12:40 PM To: comments@pointthomsonprojecteis.com Cc: extraski@gmail.com Subject: Online form submission Name: Judy P Patrick Email: jpp@mtaonline.net Address: 600 Glenwood Ave. City: Wasilla State: AK Zip: 99654 Contact Phone: 907223-4704 Comments: I fully support ExxonMobil's proposed Point Thomson plan of development Alternative B. Industry has proven that oil and gas can be responsibly extracted in the Arctic environment with minimal, and sometimes positive impact. (Such as in the case of the caribou herd population increasing around Prudhoe Bay since oil was first produced in the 1970's.) Statement of Support for Alternative B 208 Alternative B provides important options for transportation to/from and in and around the Pt. Thomson area. With a development of this complexity, and in a remote location, it is necessary to consider not strictly the environment, but also the safety of the people who will work there. Alt. B takes into consideration these and other measures to ensure wildlife, the tundra ecosystem, aquatic and human life are protected. It also allows for subsistence users as well. Alaska is a resource based state. For our residents and governments mutual benefit, (survival even) we need to move forward with responsible resource development, such as Pt. Thomson, for the jobs and revenue it creates. My wish is for regulatory agencies to see themselves as partners in this process. file:///C|/Documents%20and%20Settings/ccdavis/Desktop/Point%20Thomson/Draft%20EIS%20Comments/010612_Judy.Patrick.txt[1/6/2012 4:52:59 PM]	208 Comment noted; no action required.

Comment	Response
	607 Comment noted; no action required.

0204_Steve.Post_Bus

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HOOKED ON SAFETY

To: Harry Baij
US Army Corps of Engineers
harry.a.baij@usace.army.mil

January 4, 2012

Statement of Support for Alternative B 607

Subject: **Support of Alternative B for the development of Pt. Thomson**

Dear Mr Baij,

North Star Terminal & Stevedore Co LLC and North Star Equipment Services has operated in Alaska since 1950. Our livelihood in great part depends on responsible resource development. We have been active in developing solutions in support of the marine cargo handling needs and construction of the bridges and marine facilities for the Pt Thomson project. This will generate over 40 high paying jobs for our company and needs your support.

The proposed project is important to the state of Alaska and to Alaskans. Of the design alternatives considered, Alternative B provides the safest, most environmentally-responsible solution for developing Point Thomson's resources.

Alternative B ensures a minimal environmental footprint by incorporating a combination of summer coastal barging, winter ice roads, aviation, and in-field roads. These features are essential to the project's safe and efficient operations.

Through Alternative B, ExxonMobil will implement comprehensive mitigation measures to minimize impact on tundra, wildlife, aquatic resources, and subsistence activities.

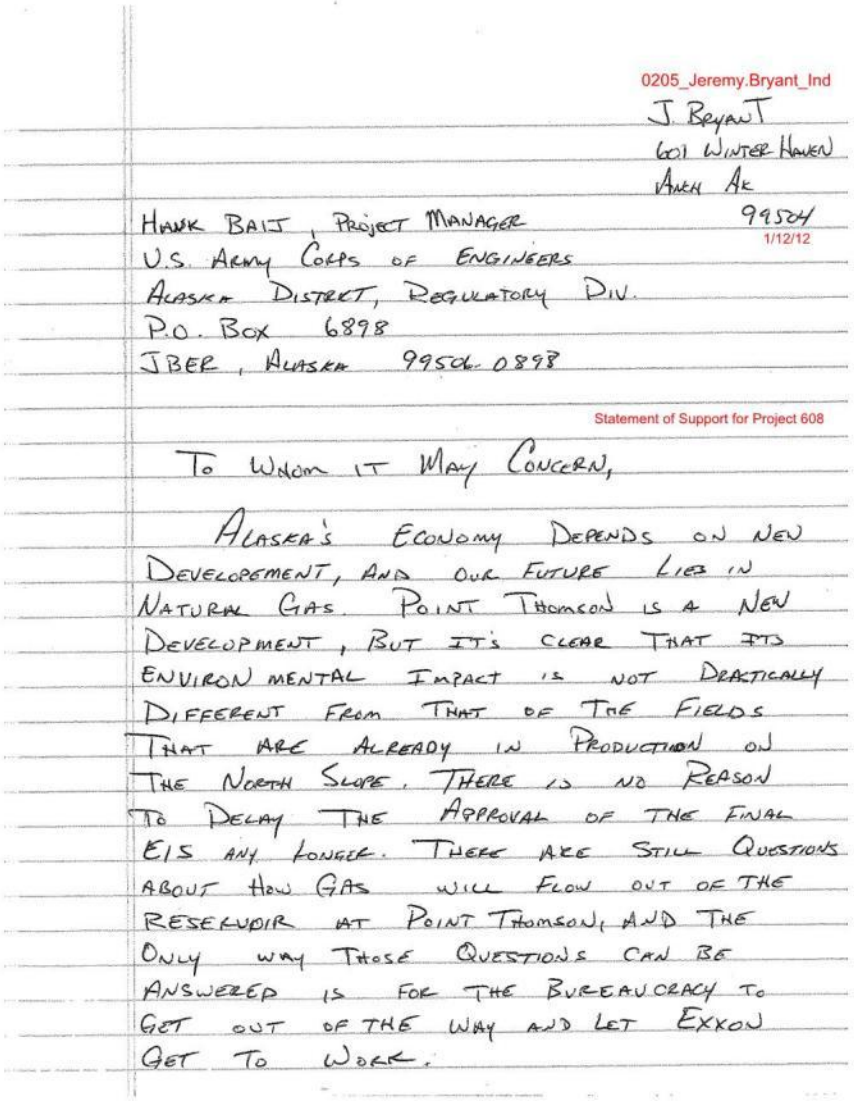
The Point Thomson project will provide wide-ranging benefits to Alaska in the form of new business opportunities, jobs, and revenues.

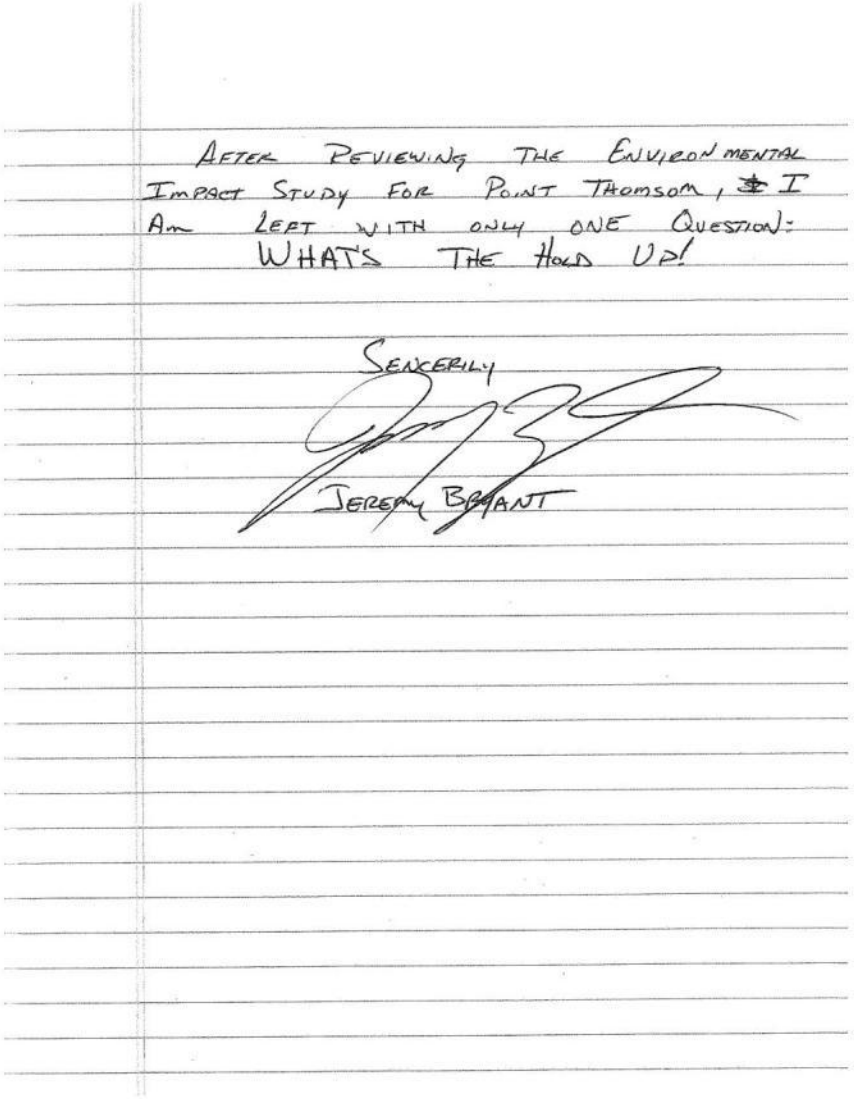
Approval of the Point Thomson project, as proposed in Alternative B, is vital to the development of this world-class resource and North Slope gas commercialization.

Direct benefits to the State of Alaska from Point Thomson include training and jobs for Alaskans, new revenues to the state and local governments, increased throughput for the Trans-Alaska oil pipeline, and increased business activity and revenue for the private sector.

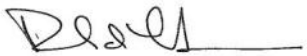
Point Thomson is a highly-technical project with high costs. Unnecessary requirements that provide very little, if any, incremental environmental benefits, should be avoided as to not compromise the economic viability of the project.

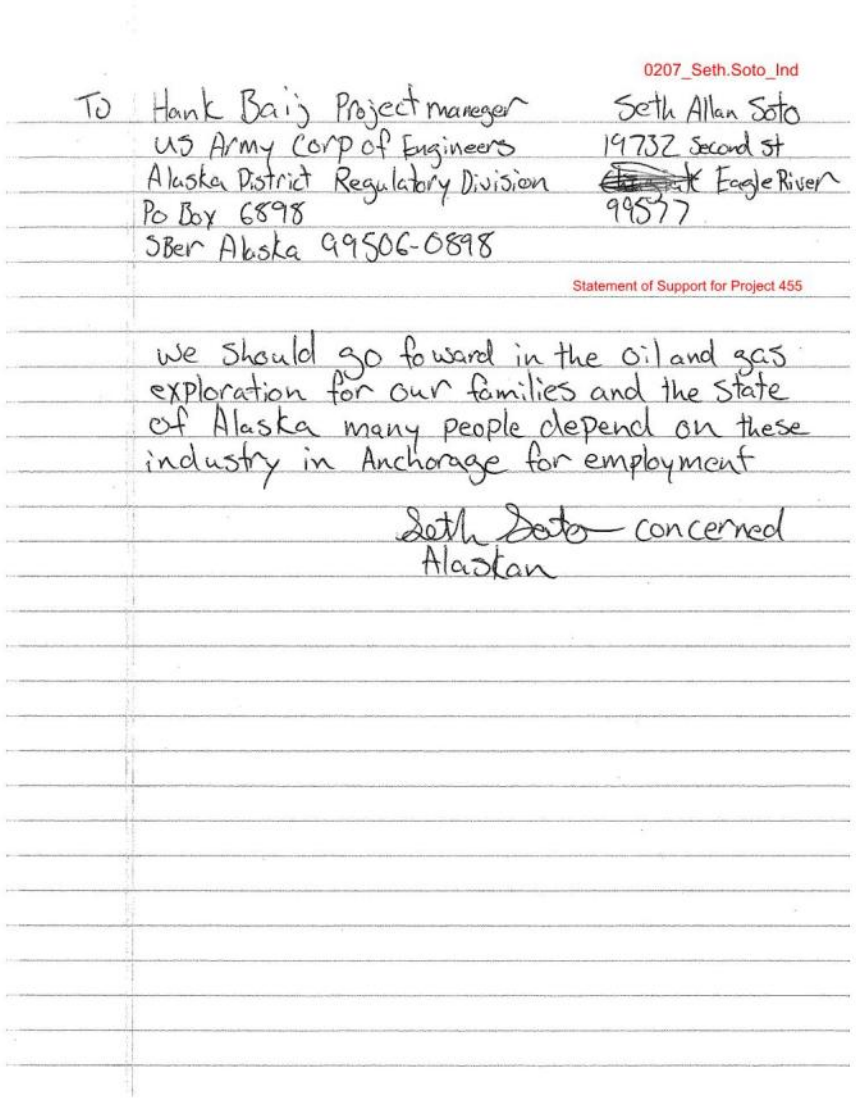
Comment	Response
The in-field roads included in Alternative B have been carefully routed to minimize the gravel footprint and for the efficient pass through of water. Moving roads inland as proposed in Alternative C and D would increase the gravel footprint and be less effective in maintaining natural drainage patterns of the project area. Alternatives C and D would move project components inland and eliminate barging, which is an established and safe means of supply for North Slope communities, including Prudhoe Bay. ExxonMobil has conducted safe barging operations in accordance with the Alaska Eskimo Whaling Commission Conflict Avoidance Agreement and in direct consultation with local whaling communities. 188 barging trips in support of Point Thomson have occurred with no impacts to marine mammals or subsistence. Alternatives C and D both result in inefficient logistical support and adds unnecessary challenges. Eliminating summer barging would result in increased costs, schedule delays, and increased tundra traffic. The 44-mile gravel road from Endicott to Point Thomson as proposed under Alternative C would create a much larger tundra footprint. Current North Slope experience at Alpine and Badami demonstrates that a gravel road is not necessary to support Point Thomson. However, not having a road connecting to Prudhoe Bay does make the combination of barging, ice roads, air access and in-field gravel roads essential. Alternative E would eliminate in-field gravel roads and shorten the airstrip. This alternative relies solely on helicopters and seasonally limited off-road vehicles for transportation to East and West pads for nine months of the year. There is no North Slope precedent for a production facility with such limitations. Moreover, inability to fly in poor weather introduces unnecessary safety risks for personnel, as well as emergency response limitations and operational inefficiencies. The longer runway in Alternative B provides better access in bad weather, reduces the number of flights by allowing larger aircraft for routine cargo shipments and allows for aircraft to transport larger equipment capabilities in the event of an emergency. We are confident that we can develop and produce the gas resources in an environmentally sensitive way. Your support of Alternative B is appreciated. Sincerely, *Steve Post* Steve Post, Vice President stevep@northstarak.com Cc Jeff Bentz, President Brad Robertson, Operations Manager	

Comment	Response
	608 Comment noted; no action required.

Comment	Response
	

Comment	Response
STEELFAB ALASKA'S STEEL SOURCE 0206_Richard.Faulkner_Bus 2132 Railroad Ave. ~ Anchorage, AK 99501 ~ 907-276-4303 ~ Fax 907-276-3448 **January 11, 2012** Congressman Don Young Anchorage District Office 4241 B Street, Ste. 203 Anchorage, AK 99503 Subject: Point Thomson Dear Congressman Don Young, Not a Comment on EIS 454 I was disheartened this month to learn that the public comment period on the Environmental Impact Study (EIS) for Exxon's Point Thomson project has been extended due to the fact that no comments opposing the project were received during the original public comment period. My initial objection this new delay should be obvious. Clearly, based on what have apparently been overwhelmingly positive comments already received by the U.S. Army Corps of Engineers, the majority of Alaskans support moving forward with development at Point Thomson. This should come as no surprise to anyone who understands Alaska's economy. Extending the public comment period won't change the fact that Alaskans support responsible oil and gas production. My second concern, however, is the real source of my – and many of my friends' and neighbors' – frustration: Why have we been forced to sit through yet another delay? Point Thomson holds one quarter of the North Slope's known gas reserves – 8 trillion cubic feet of gas and 200 million barrels of gas condensate. The field has the potential to play a role in securing Alaska's economic future for years to come. Production must begin at Point Thomson before the field's full value can be assessed, and before the technical challenges of recovering Point Thomson gas can be fully understood. Point Thomson's potential can't be realized – or even accurately measured – while its progress is tied up in bureaucratic red tape.	454 Comment noted; no action required.

Comment	Response
Hundred of Alaska businesses, including mine, depend on the oil and gas industry. Point Thomson will have a direct and lasting impact on our livelihoods, and we have been waiting patiently for the field to come on line. We waited through the lease cancellations. We waited for the lawsuits to end. We waited for the draft EIS, which was released more than a year past its due date. We waited for the public comment period to close – twice. And now, more than two years after the EIS process began, we are still waiting for the final approval so ExxonMobil can move forward with production at Point Thomson. We are through waiting. This process has been held up for far too long already. After years of litigation and delays, it's time to move forward. The sooner a final EIS is approved, the sooner we can put Point Thomson to work for Alaska. Exxon has done everything it can do. It is now up to the U.S. Army Corps of Engineers and other government agencies to get out of the way and let them get to work. The extension of the public comment deadline is just one more needless delay standing between Alaska and economic security. I know I don't have to explain to you how important the petroleum industry is to Alaska's economy, and I'm sure you can understand my frustration at having to write this letter. I am calling on you, as the elected representative of the people of Alaska, to take action to put an end to the waiting. We need Point Thomson. We can't wait any longer. Sincerely,  RICHARD FAULKNER President	

Comment	Response
	455 Comment noted; no action required.

0207_Seth.Soto_Ind

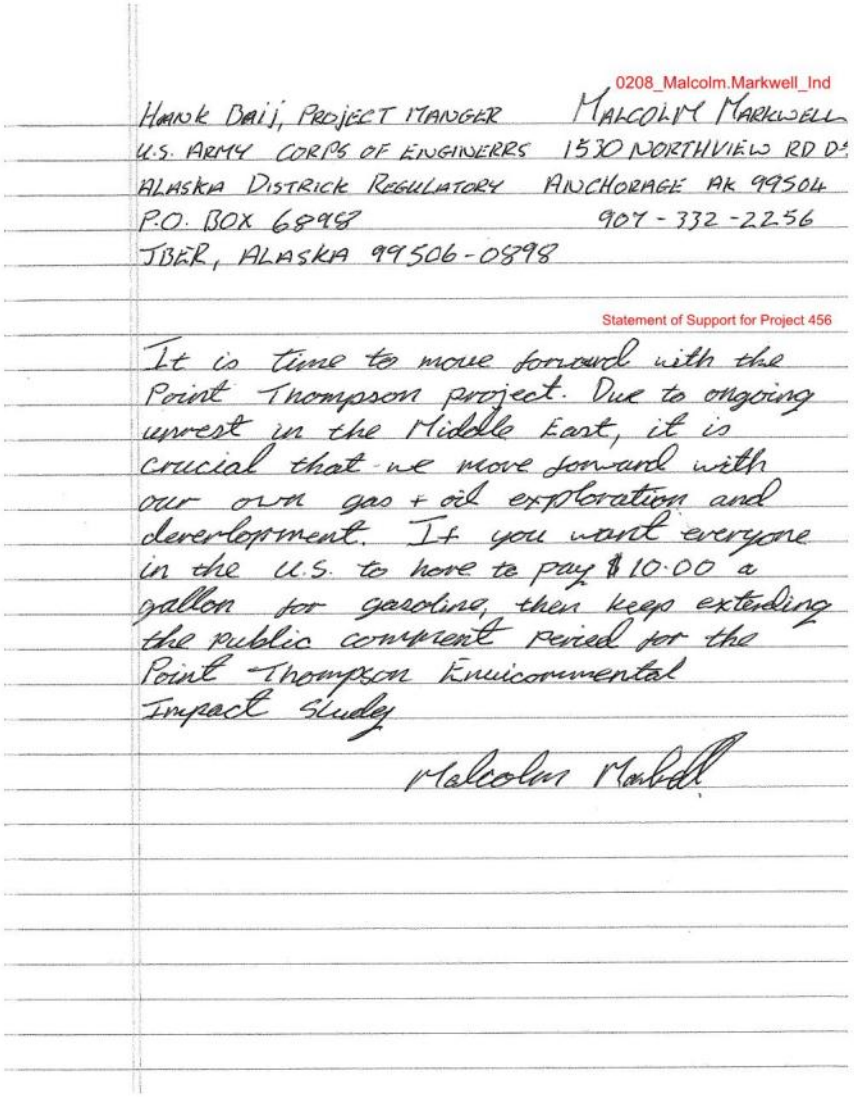
To Hank Baij Project manager
US Army Corp of Engineers
Alaska District Regulatory Division
Po Box 6898
JBer Alaska 99506-0898

Seth Allan Soto
19732 second st
Eagle River
99577

Statement of Support for Project 455

we should go foward in the oil and gas exploration for our families and the State of Alaska many people depend on these industry in Anchorage for employment

Seth Soto — concerned Alaskan

Comment	Response
	456 Comment noted; no action required.

0208_Malcolm.Markwell_Ind

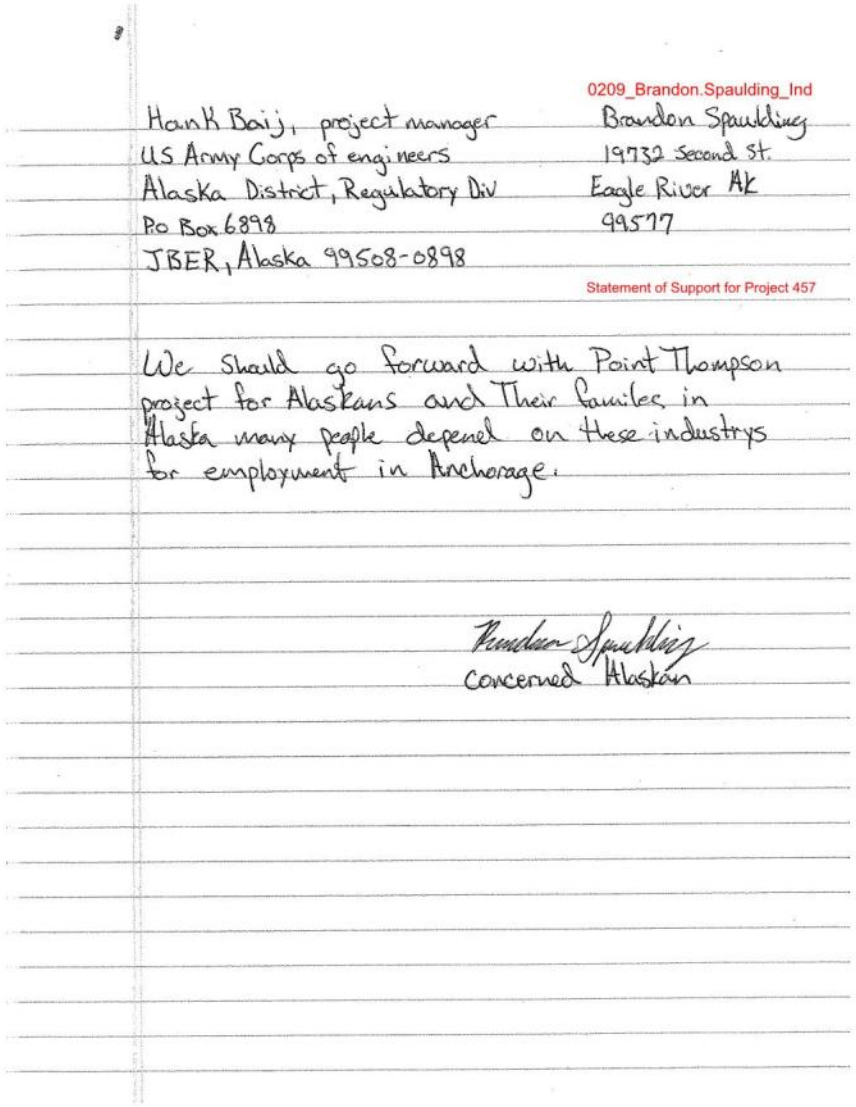
Hank Baij, Project Manger
U.S. Army Corps of Engineers
Alaska District Regulatory
P.O. Box 6898
JBER, Alaska 99506-0898

Malcolm Markwell
1530 Northview Rd D2
Anchorage AK 99504
907-332-2256

Statement of Support for Project 456

It is time to move forward with the Point Thompson project. Due to ongoing unrest in the Middle East, it is crucial that we move forward with our own gas + oil exploration and development. If you want everyone in the U.S. to have to pay $10.00 a gallon for gasoline, then keep extending the public comment period for the Point Thompson Environmental Impact Study

Malcolm Markwell

Comment	Response
	457 Comment noted; no action required.

0209_Brandon.Spaulding_Ind

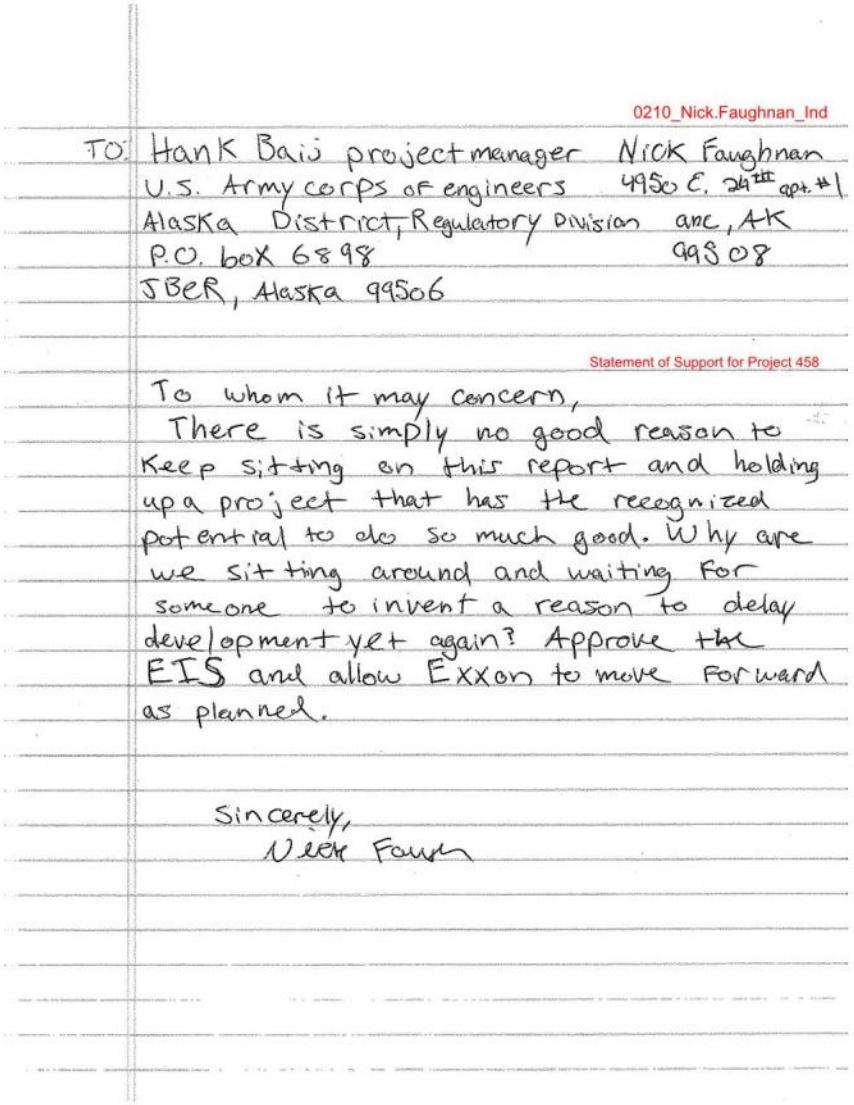
Hank Baij, project manager
US Army Corps of engineers
Alaska District, Regulatory Div
Po Box 6898
JBER, Alaska 99508-0898

Brandon Spaulding
19732 Second St.
Eagle River AK
99577

Statement of Support for Project 457

We should go forward with Point Thompson project for Alaskans and Their families in Alaska many people depend on these industrys for employment in Anchorage.

Brandon Spaulding
concerned Alaskan

Comment	Response
	458 Comment noted; no action required.

0210_Nick.Faughnan_Ind

TO: Hank Baij project manager
U.S. Army corps of engineers
Alaska District, Regulatory Division
P.O. box 6898
JBER, Alaska 99506

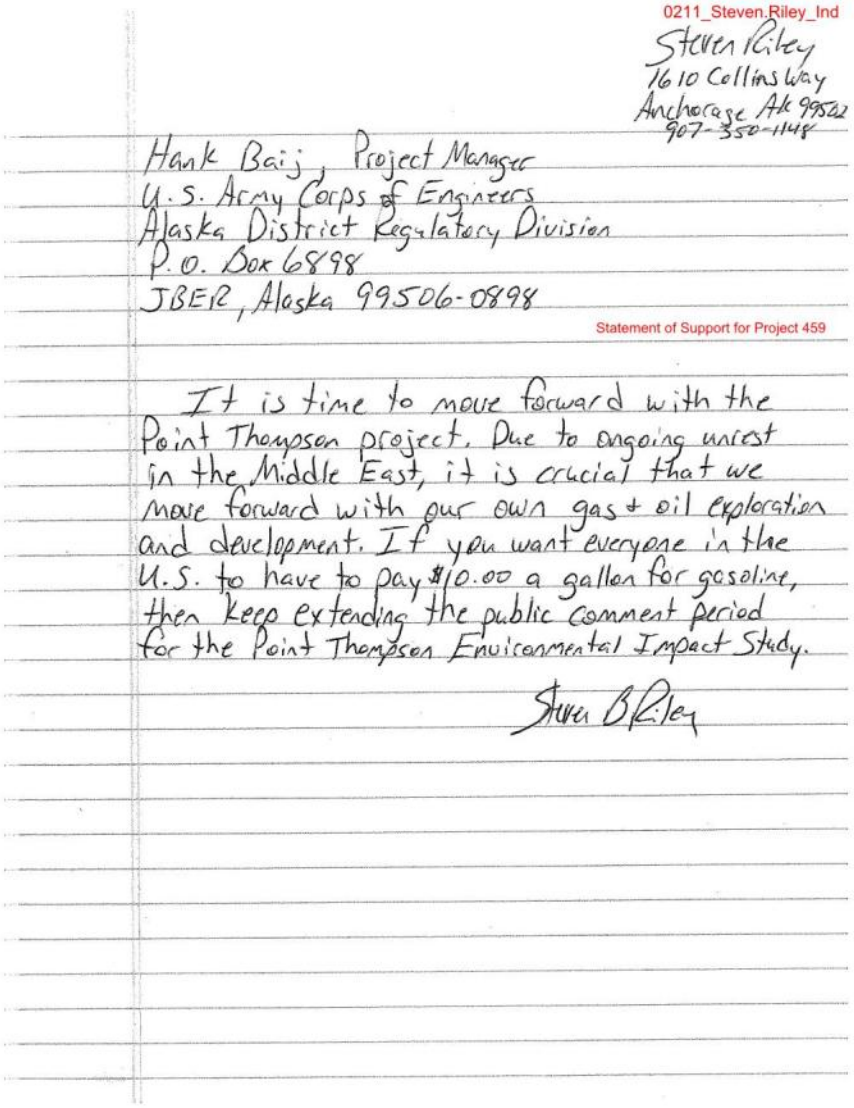
FROM: Nick Faughnan
4950 E. 24th apt. #1
anc, AK
99508

Statement of Support for Project 458

To whom it may concern,

There is simply no good reason to keep sitting on this report and holding up a project that has the recognized potential to do so much good. Why are we sitting around and waiting for someone to invent a reason to delay development yet again? Approve the EIS and allow Exxon to move forward as planned.

Sincerely,
Nick Faun

Comment	Response
	459 Comment noted; no action required.

0211_Steven_Riley_Ind

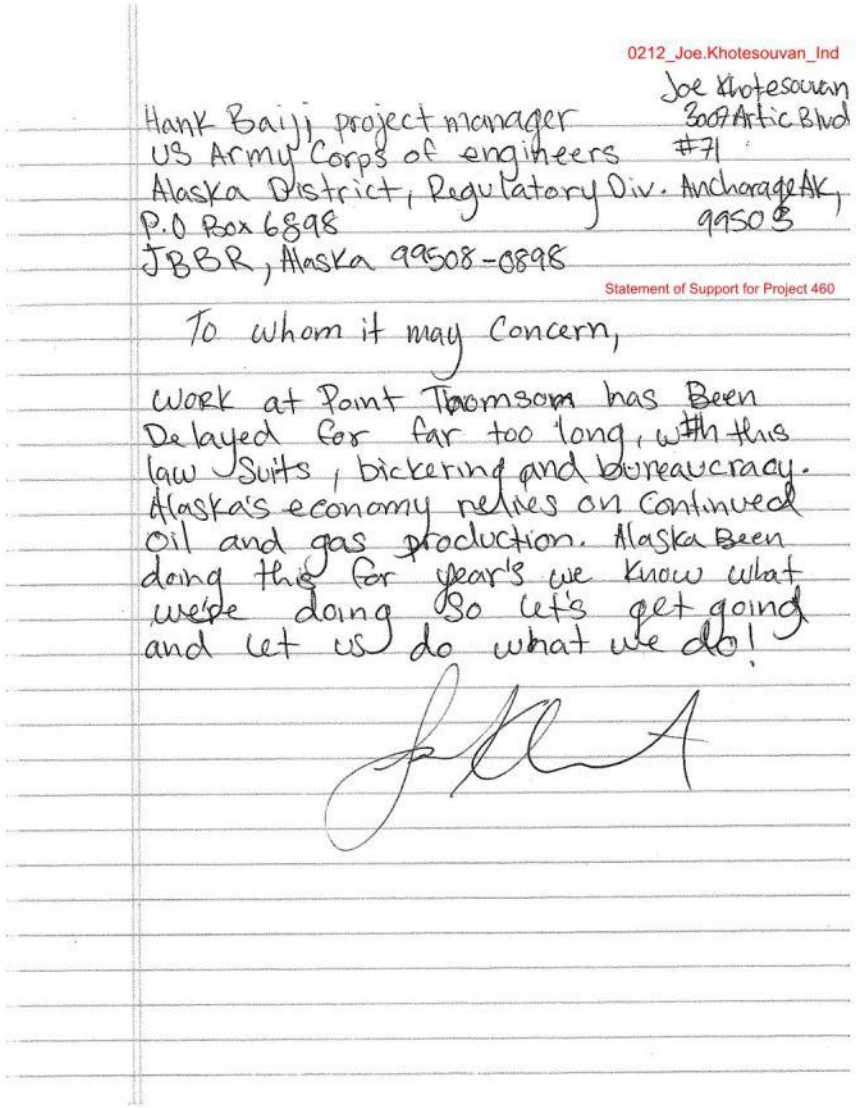
Steven Riley
1610 Collins Way
Anchorage Ak 99502
907-350-1148

Hank Baij, Project Manager
U.S. Army Corps of Engineers
Alaska District Regulatory Division
P.O. Box 6898
JBER, Alaska 99506-0898

Statement of Support for Project 459

It is time to move forward with the Point Thompson project. Due to ongoing unrest in the Middle East, it is crucial that we move forward with our own gas + oil exploration and development. If you want everyone in the U.S. to have to pay $10.00 a gallon for gasoline, then keep extending the public comment period for the Point Thompson Environmental Impact Study.

Steven B Riley

Comment	Response
	460 Comment noted; no action required.

0212_Joe.Khotesouvan_Ind

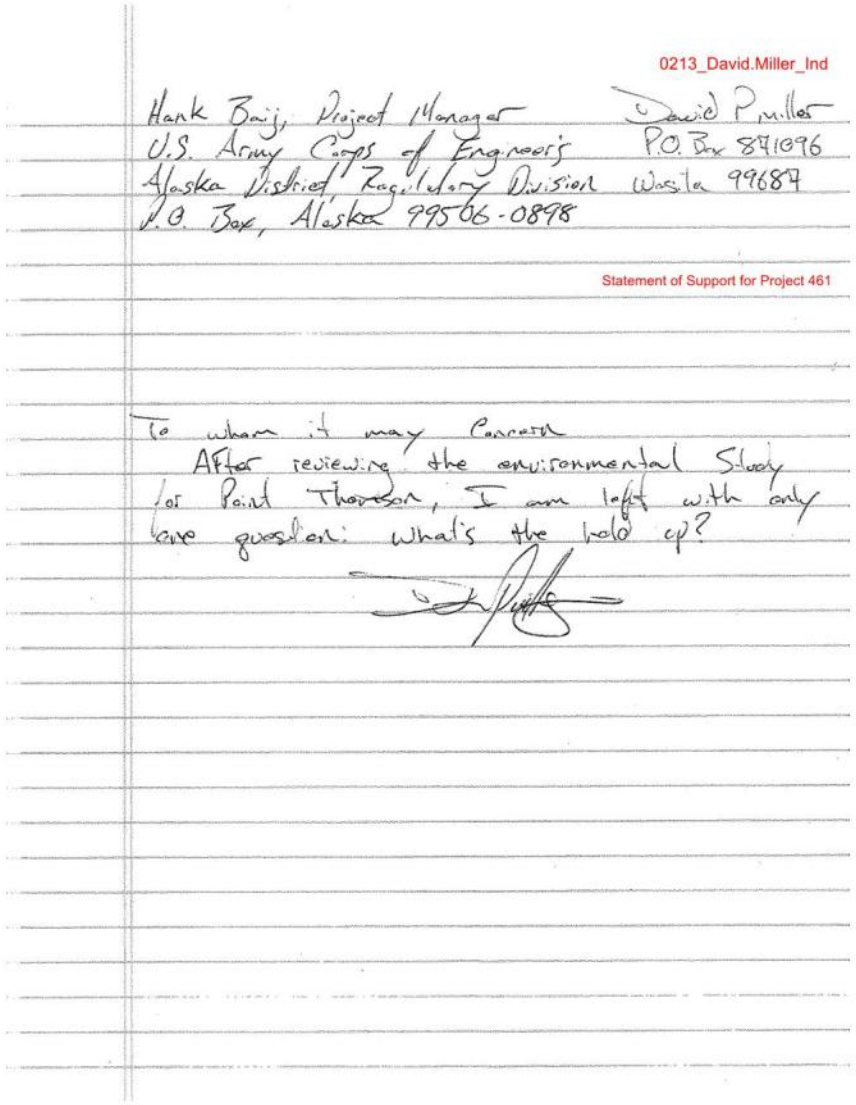
Joe Khotesouvan
3007 Artic Blvd #71
Anchorage AK, 99503

Hank Baij, project manager
US Army Corps of engineers
Alaska District, Regulatory Div.
P.O Box 6898
JBER, Alaska 99508-0898

Statement of Support for Project 460

To whom it may Concern,

Work at Point Thomsom has Been Delayed for far too long, with this law Suits, bickering and bureaucracy. Alaska's economy relies on Continued Oil and gas production. Alaska Been doing this for year's we know what we're doing So let's get going and let us do what we do!

Comment	Response
	461 Comment noted; no action required.

0213_David.Miller_Ind

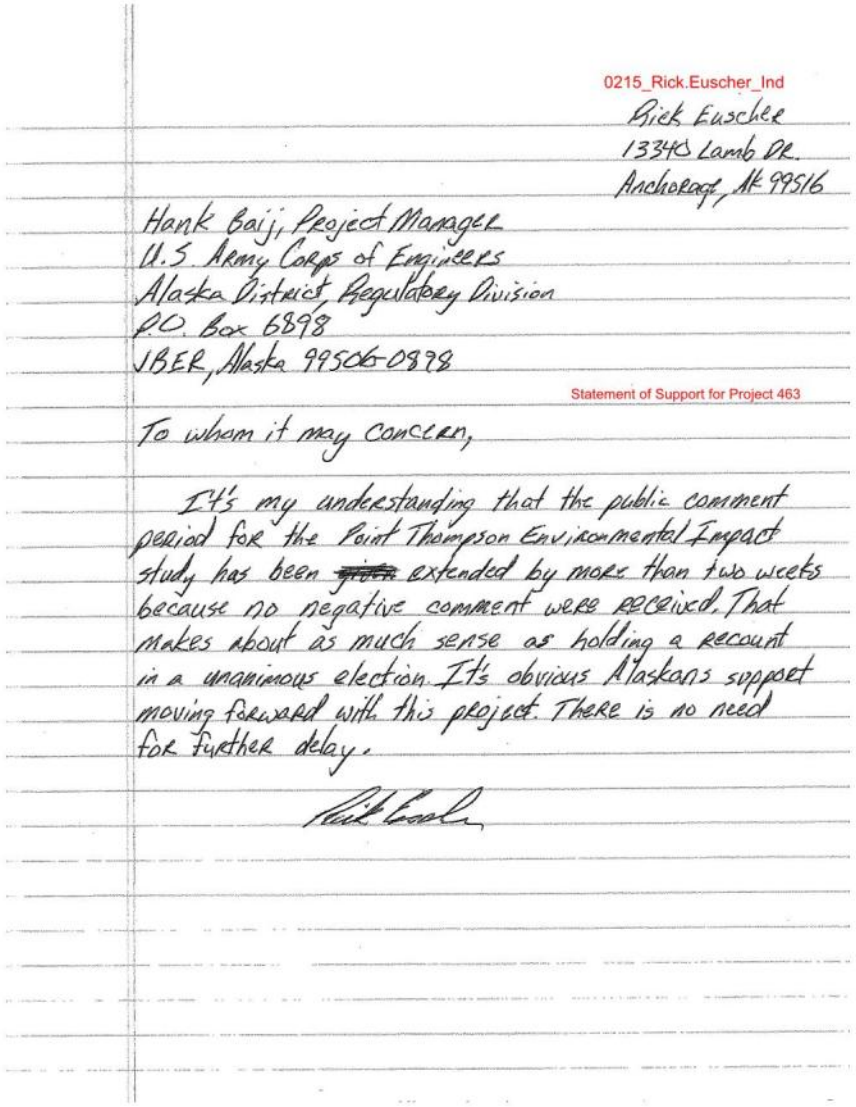
Hank Baij, Project Manager
U.S. Army Corps of Engineers
Alaska District, Regulatory Division
P.O. Box, Alaska 99506-0898

David P. Miller
P.O. Box 841096
Wasilla 99687

Statement of Support for Project 461

To whom it may Concern
After reviewing the environmental Study for Point Thomson, I am left with only one question: What's the hold up?

Comment	Response
0214_Robert.Johnson_Ind.pdf Hank Baij, project manager U.S Army corps of Engineers Alask District, Regulary Division P.O. Box Alaska 99506-0895 Robert Johnson P.O Box 243312 Anchorage AK. 99524 907-884-1774 Statement of Support for Project 462 To whom it may concern: The draft EIS makes it clear that the point Thomson project does not pose any greater risk to the Environment than any other responsibly-developed oil and gas project, The North Slope is not a new environment for oil and gas companies. Production has been going on these for more than 30 years. The risks and special considerations are well known to the producers that operate in the Arctic, Looking at the EIS, it's clear Exxon has taken steps in it's planning to minimize the project's impact on the Environment, So why are we facing yet another needless delay, I like most Families, depend on the oil and Gas companies to Feed are Families Thanks, Robert Johnson	462 Comment noted; no action required.

Comment	Response
	463 Comment noted; no action required.

0215_Rick.Euscher_Ind

Rick Euscher
13340 Lamb Dr.
Anchorage, AK 99516

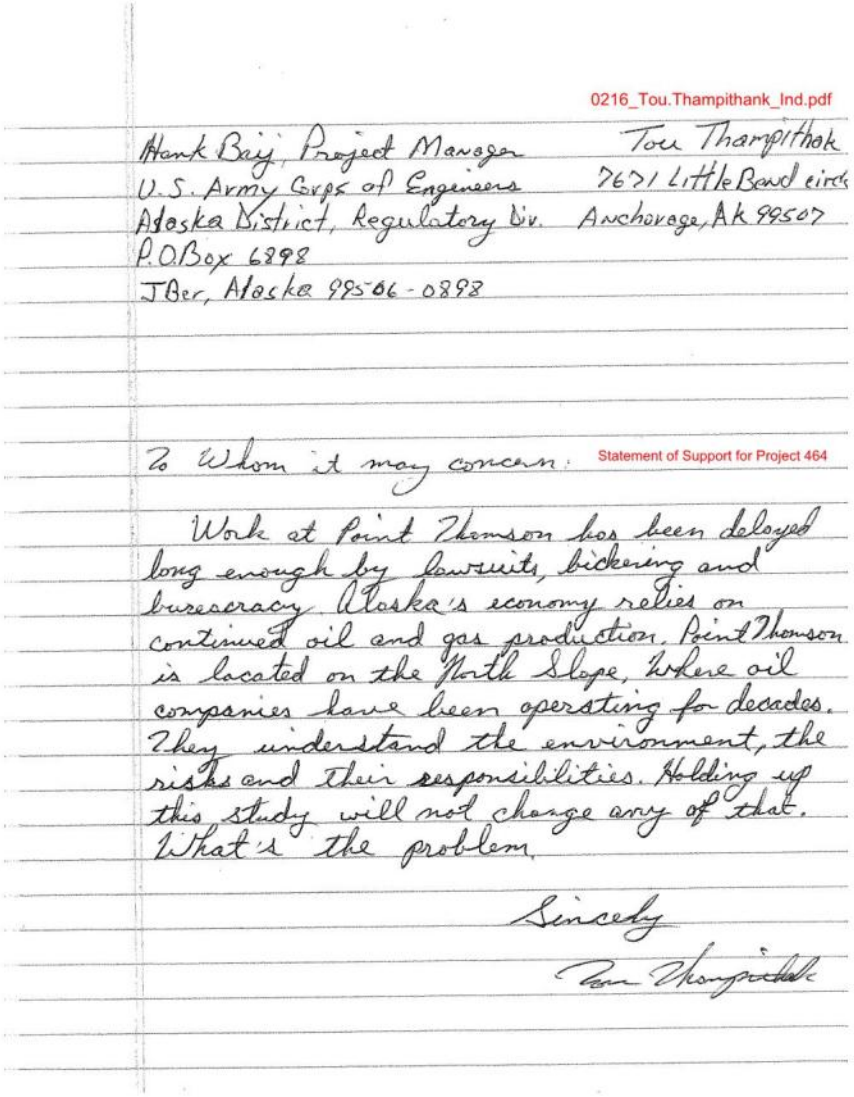
Hank Baij, Project Manager
U.S. Army Corps of Engineers
Alaska District, Regulatory Division
P.O. Box 6898
JBER, Alaska 99506-0898

Statement of Support for Project 463

To whom it may concern,

It's my understanding that the public comment period for the Point Thompson Environmental Impact study has been ~~given~~ extended by more than two weeks because no negative comment were received. That makes about as much sense as holding a recount in a unanimous election. It's obvious Alaskans support moving forward with this project. There is no need for further delay.

Rick Euscher

Comment	Response
	464 Comment noted; no action required.

0216_Tou.Thampithank_Ind.pdf

Hank Baij, Project Manager
U.S. Army Corps of Engineers
Alaska District, Regulatory Div.
P.O Box 6898
JBer, Alaska 99506-0898

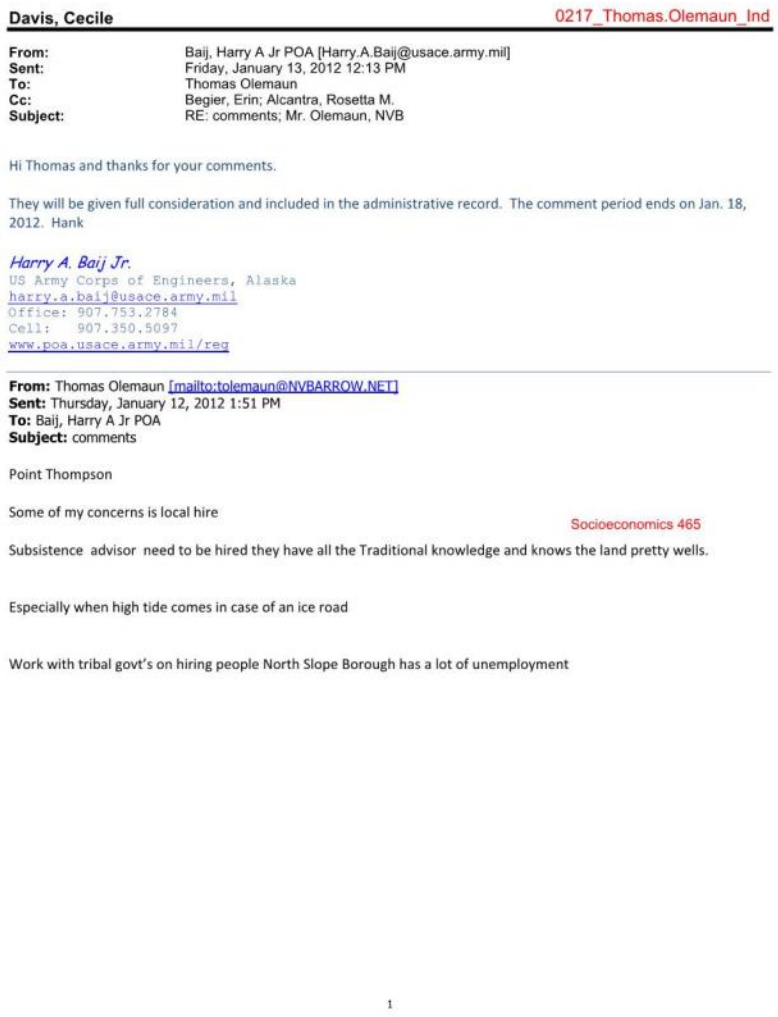
Tou Thampithak
7671 Little Bend circle
Anchorage, AK 99507

To Whom it may concern: Statement of Support for Project 464

Work at Point Thomson has been delayed long enough by lawsuits, bickering and bureaucracy. Alaska's economy relies on continued oil and gas production. Point Thomson is located on the North Slope, where oil companies have been operating for decades. They understand the environment, the risks and their responsibilities. Holding up this study will not change any of that. What's the problem.

Sincely

Tou Thampithak

Comment	Response
	465 Potential impacts to employment in the NSB are discussed in Section 5.15, Socioeconomics. During the 2008 to 2010 exploratory phase of the Point Thomson Project, the Applicant and its contractors hired NSB residents for several subsistence and wildlife monitoring positions as well as for project management, labor, and heavy equipment operations (ExxonMobil 2010d). For the current proposed project, the Applicant has committed to continuing to hire local residents and Alaska Natives and has, to date, sponsored annual job fairs in Kaktovik and supported other training and education programs in the NSB and in Alaska (ExxonMobil 2010d). The Applicant has also committed to using local suppliers, contractors, and subcontractors, provided that they meet safety, health, and environmental requirements. While the number of positions filled by NSB residents cannot be estimated at this time, it is likely that the Point Thomson Project would have a temporary and minor positive impact on resident employment in the NSB.

Comment	Response
Davis, Cecile 0218_Larry.Larson_Ind **From:** Baij, Harry A Jr POA [Harry.A.Baij@usace.army.mil] **Sent:** Friday, January 13, 2012 12:07 PM **To:** Begier, Erin; Alcantra, Rosetta M. **Subject:** FW: Point Thompson; Larry Larson's comment Comment received. Please log in. Thanks, Hank *Harry A. Baij Jr.* US Army Corps of Engineers, Alaska harry.a.baij@usace.army.mil Office: 907.753.2784 Cell: 907.350.5097 www.poa.usace.army.mil/reg **From:** Larry Larson [mailto:llarson@steelfabak.com] **Sent:** Thursday, January 12, 2012 11:23 AM **To:** Baij, Harry A Jr POA **Subject:** Point Thompson Mr Baji, Statement of Support for Project 466 It is my desire to see this project moving forward in the near future. The Exxon-Point Thomson development is crucial to my ongoing employment and many others in this state who depend on oil development. Please do whatever is in your power to moving this project to a realization. Thank you. Larry Larson 1200 Farrow Circle Anchorage, Ak 99504 1	466 Comment noted; no action required.

Comment	Response
Davis, Cecile 0219_Kevin.Mesceda_Ind **From:** Baij, Harry A Jr POA [Harry.A.Baij@usace.army.mil] **Sent:** Friday, January 13, 2012 12:05 PM **To:** Begier, Erin; Alcantra, Rosetta M. **Subject:** FW: Point Thomson DEIS; Kevin Mesceda's comment Comment received. Please log in. Thanks, Hank *Harry A. Baij Jr.* US Army Corps of Engineers, Alaska harry.a.baij@usace.army.mil Office: 907.753.2784 Cell: 907.350.5097 www.poa.usace.army.mil/reg **From:** Kevin Mesceda [mailto:kmesceda@steelfabak.com] **Sent:** Thursday, January 12, 2012 10:35 AM **To:** Baij, Harry A Jr POA **Subject:** Point Thomson DEIS Mr. Baij, I am writing you this letter in regards to the Point Thomson DEIS. Statement of Support for Project 467 I strongly urge the US Army Corps of Engineers to conclude this DEIS and give the green light for development of the Point Thomson Oil and Gas field. The delays and extensions of comment periods have become cumbersome and awkward. How is it reasonable to extend an "open" comment period for lack of opposition? The process of studying this particular field has gone on long enough. This is an Onshore development with planned Gravel Working Pads, that is proven technology in the planned environment that has been working for 40years! I believe the time is now for this project to be moving forward and creating jobs for Alaskans and Americans as a whole. As a resident of the State of Alaska for the last 39 years I believe that Alaskans in partnership with the Oil Producers have the knowhow to responsibly develop these new fields. Enough of the Red Tape and bureaucracy when this comment period ends I urge your office to release Exxon-Mobil to begin development of Point Thomson. Respectfully yours, **Kevin Mesceda** **Business Development Manager** **STEELFAB** **907-264-2813** **907-830-2868 Cell** 1	467 Comment noted; no action required.

Comment	Response
-	468 Comment noted; no action required.

0220_Fredd.Parady_NGO

ALASKA MINERS ASSOCIATION, INC.

January 12, 2012

Mr. Harry Baij, Jr. harry.a.baij@usace.army.mil FAX 907-753-5567
Army Corps of Engineers
PO Box 6898
CEPOA_RD
JBER, AK 99506-0898

Re: Point Thompson EIS

Dear Mr. Baij,

Statement of Support for Alternative B 468

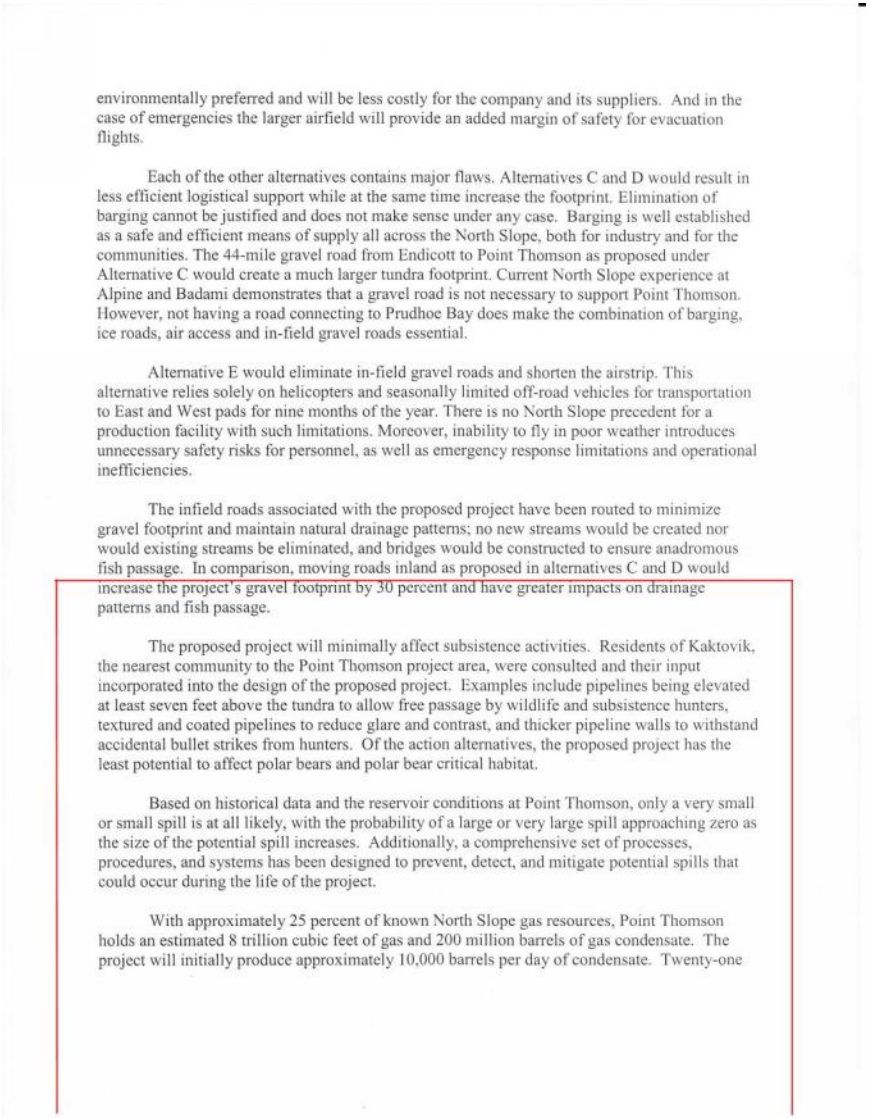
The Alaska Miners Association supports **Alterative B** as the preferred alternative for the Point Thompson Environmental Impact Statement.

The Alaska Miners Association is a non-profit membership organization established in 1939 to represent the mining industry in Alaska. The AMA is composed of more than 1400 individual prospectors, geologists and engineers, vendors, suction dredge miners, small family mines, junior mining companies, and major mining companies. Our members look for and produce gold, silver, platinum, diamonds, lead, zinc, copper, coal, limestone, sand and gravel, crushed stone, armor rock, and other materials. Our members live and work throughout the state and all depend on petroleum products for their businesses and for their personal lives.

Alternative B is the logical choice for a number of environmental, technical and economic reasons. From the environmental viewpoint Alternative B provides the safest, most environmentally-responsible solution for developing Point Thomson's resources. It would have a minimal environmental impact by using a combination of summer coastal barging, winter ice roads, aviation, and in-field roads. All of these modes of transportation are essential for the movement of people, equipment and material.

Alternative B includes various mitigation measures to minimize impact on other resources including tundra, water, wildlife, and subsistence. These measures include protecting polar bears and other wildlife and waterfowl. Furthermore the barge route proposed is outside the main fall migration corridor of bowhead whales.

Under Alternative B gravel pads, roads and bridges have been cited to minimize the footprint and allow for drainage and water flows. It is important that the longer runway is utilized to [provide safer access during bad weather and will reduce the number of flights by accommodating larger aircraft. This is also a benefit because it will allow use of larger aircraft for shipping cargo and equipment. The result will be fewer larger flights which are

Comment	Response
- 	469 Comment noted; no action required.

environmentally preferred and will be less costly for the company and its suppliers. And in the case of emergencies the larger airfield will provide an added margin of safety for evacuation flights.

Each of the other alternatives contains major flaws. Alternatives C and D would result in less efficient logistical support while at the same time increase the footprint. Elimination of barging cannot be justified and does not make sense under any case. Barging is well established as a safe and efficient means of supply all across the North Slope, both for industry and for the communities. The 44-mile gravel road from Endicott to Point Thomson as proposed under Alternative C would create a much larger tundra footprint. Current North Slope experience at Alpine and Badami demonstrates that a gravel road is not necessary to support Point Thomson. However, not having a road connecting to Prudhoe Bay does make the combination of barging, ice roads, air access and in-field gravel roads essential.

Alternative E would eliminate in-field gravel roads and shorten the airstrip. This alternative relies solely on helicopters and seasonally limited off-road vehicles for transportation to East and West pads for nine months of the year. There is no North Slope precedent for a production facility with such limitations. Moreover, inability to fly in poor weather introduces unnecessary safety risks for personnel, as well as emergency response limitations and operational inefficiencies.

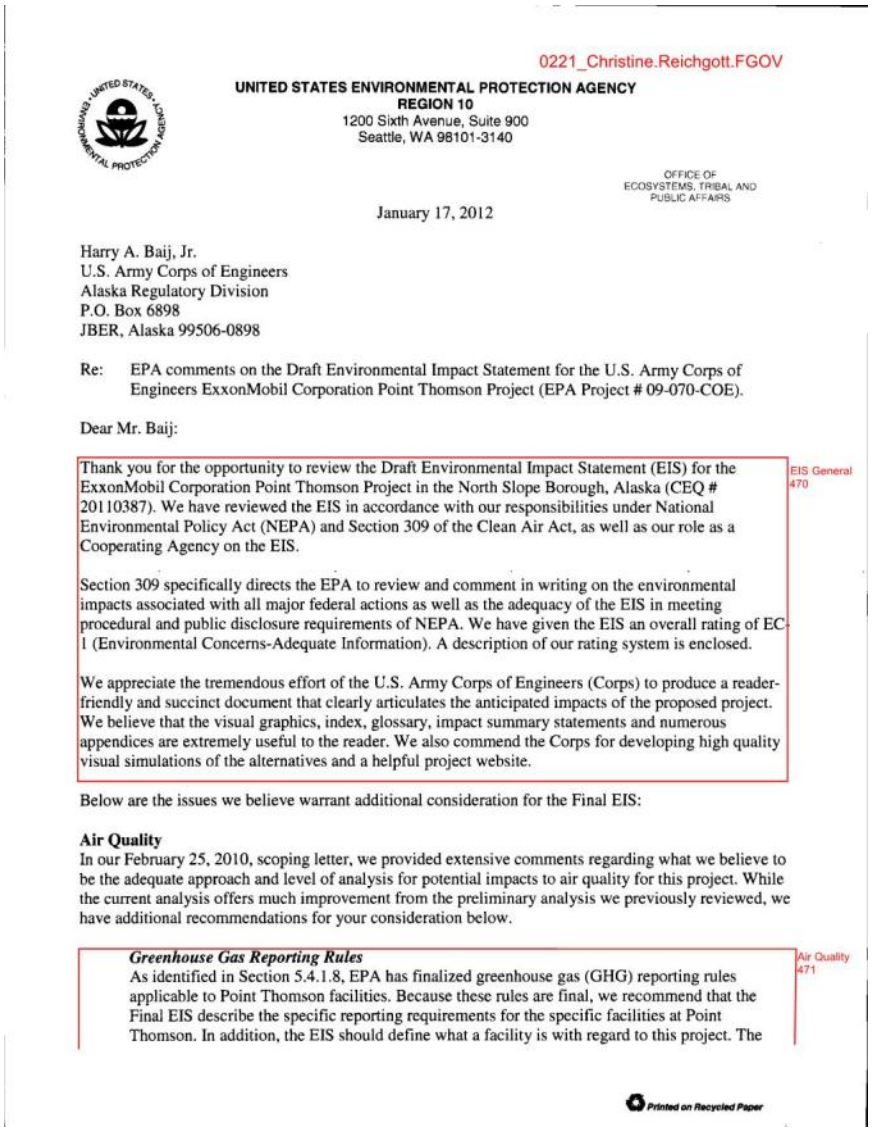
The infield roads associated with the proposed project have been routed to minimize gravel footprint and maintain natural drainage patterns; no new streams would be created nor would existing streams be eliminated, and bridges would be constructed to ensure anadromous fish passage. In comparison, moving roads inland as proposed in alternatives C and D would increase the project's gravel footprint by 30 percent and have greater impacts on drainage patterns and fish passage.

The proposed project will minimally affect subsistence activities. Residents of Kaktovik, the nearest community to the Point Thomson project area, were consulted and their input incorporated into the design of the proposed project. Examples include pipelines being elevated at least seven feet above the tundra to allow free passage by wildlife and subsistence hunters, textured and coated pipelines to reduce glare and contrast, and thicker pipeline walls to withstand accidental bullet strikes from hunters. Of the action alternatives, the proposed project has the least potential to affect polar bears and polar bear critical habitat.

Based on historical data and the reservoir conditions at Point Thomson, only a very small or small spill is at all likely, with the probability of a large or very large spill approaching zero as the size of the potential spill increases. Additionally, a comprehensive set of processes, procedures, and systems has been designed to prevent, detect, and mitigate potential spills that could occur during the life of the project.

With approximately 25 percent of known North Slope gas resources, Point Thomson holds an estimated 8 trillion cubic feet of gas and 200 million barrels of gas condensate. The project will initially produce approximately 10,000 barrels per day of condensate. Twenty-one

Comment	Response
- exploration wells have been drilled in the Point Thomson area to date, both onshore and offshore, without any incident whatsoever. As the proposed project moves forward, revenues will flow throughout the state. Point Thomson resources are vital to efforts to commercialize Alaska's gas. Given the minimal impacts to tundra, wildlife, aquatic resources, and subsistence activities, and the benefits the project would provide the state and Alaskans, the Alaska Miners Association joins others in urging the Corps to select alternative B in the Final EIS. Given all of the above, it is vital that this EIS proceed in a timely manner to a sound decision, which in this case is the approval of Alternative B. If you have any questions on these comments, please do not hesitate to contact me. Statement of Support for Alternative B 469 Cordially, Fred Parady Executive Director, AMA cc: The Hon. Lisa Murkowski – U.S. Senator The Hon. Mark Begich – U.S. Senator The Hon. Don Young – U.S. Representative K. Knutson – State of Alaska	

Comment	Response
	470 Comment noted; no action required. 471 Draft response to be replaced by pending EPA text--The Corps believes that the general discussion of GHG reporting requirements included in the Draft EIS is appropriate for a NEPA document, which is focused on assessment of environmental impacts. Additional details on specific GHG reporting requirements, including identification of applicable NAICS codes, are typically included in the state's air quality permit or associated technical support document.

0221_Christine.Reichgott.FGOV

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

January 17, 2012

Harry A. Baij, Jr.
U.S. Army Corps of Engineers
Alaska Regulatory Division
P.O. Box 6898
JBER, Alaska 99506-0898

Re: EPA comments on the Draft Environmental Impact Statement for the U.S. Army Corps of Engineers ExxonMobil Corporation Point Thomson Project (EPA Project # 09-070-COE).

Dear Mr. Baij:

Thank you for the opportunity to review the Draft Environmental Impact Statement (EIS) for the ExxonMobil Corporation Point Thomson Project in the North Slope Borough, Alaska (CEQ # 20110387). We have reviewed the EIS in accordance with our responsibilities under National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, as well as our role as a Cooperating Agency on the EIS. EIS General 470

Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions as well as the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA. We have given the EIS an overall rating of EC-1 (Environmental Concerns-Adequate Information). A description of our rating system is enclosed.

We appreciate the tremendous effort of the U.S. Army Corps of Engineers (Corps) to produce a reader-friendly and succinct document that clearly articulates the anticipated impacts of the proposed project. We believe that the visual graphics, index, glossary, impact summary statements and numerous appendices are extremely useful to the reader. We also commend the Corps for developing high quality visual simulations of the alternatives and a helpful project website.

Below are the issues we believe warrant additional consideration for the Final EIS:

Air Quality
In our February 25, 2010, scoping letter, we provided extensive comments regarding what we believe to be the adequate approach and level of analysis for potential impacts to air quality for this project. While the current analysis offers much improvement from the preliminary analysis we previously reviewed, we have additional recommendations for your consideration below.

Greenhouse Gas Reporting Rules Air Quality 471
As identified in Section 5.4.1.8, EPA has finalized greenhouse gas (GHG) reporting rules applicable to Point Thomson facilities. Because these rules are final, we recommend that the Final EIS describe the specific reporting requirements for the specific facilities at Point Thomson. In addition, the EIS should define what a facility is with regard to this project. The

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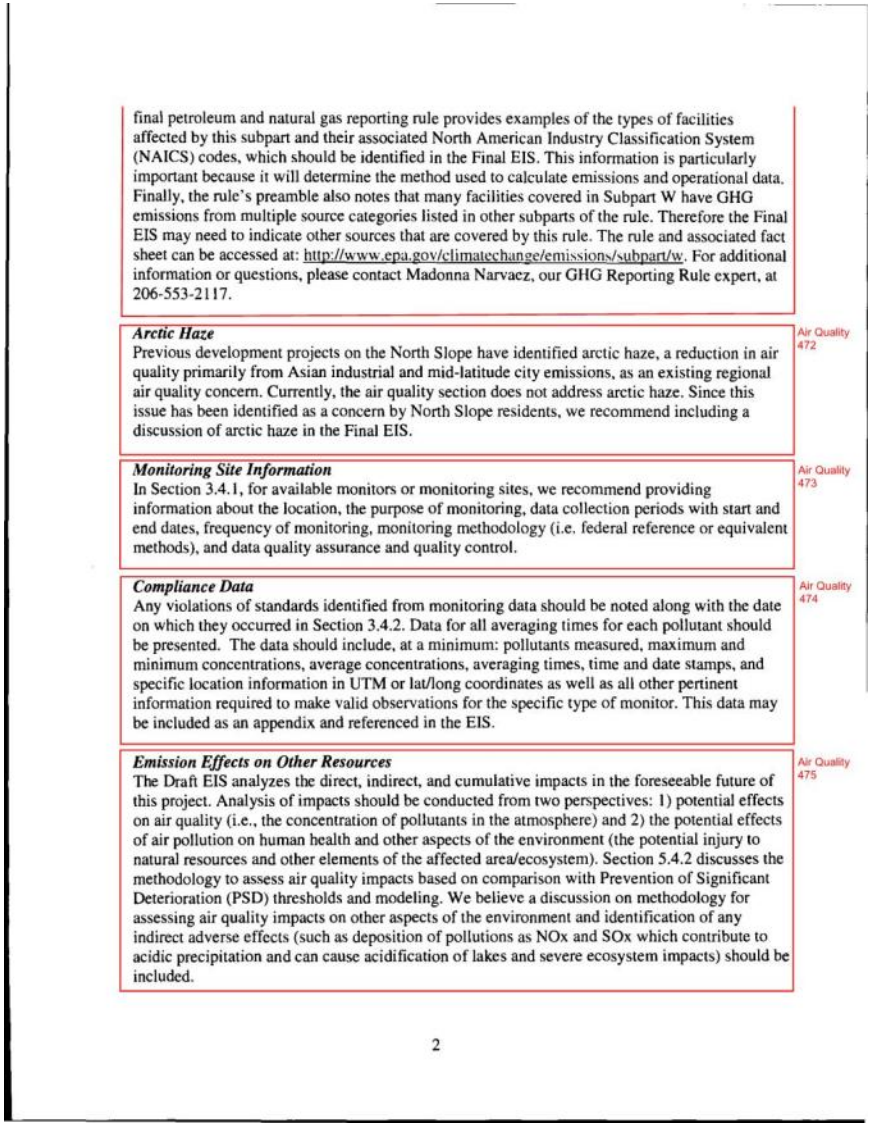
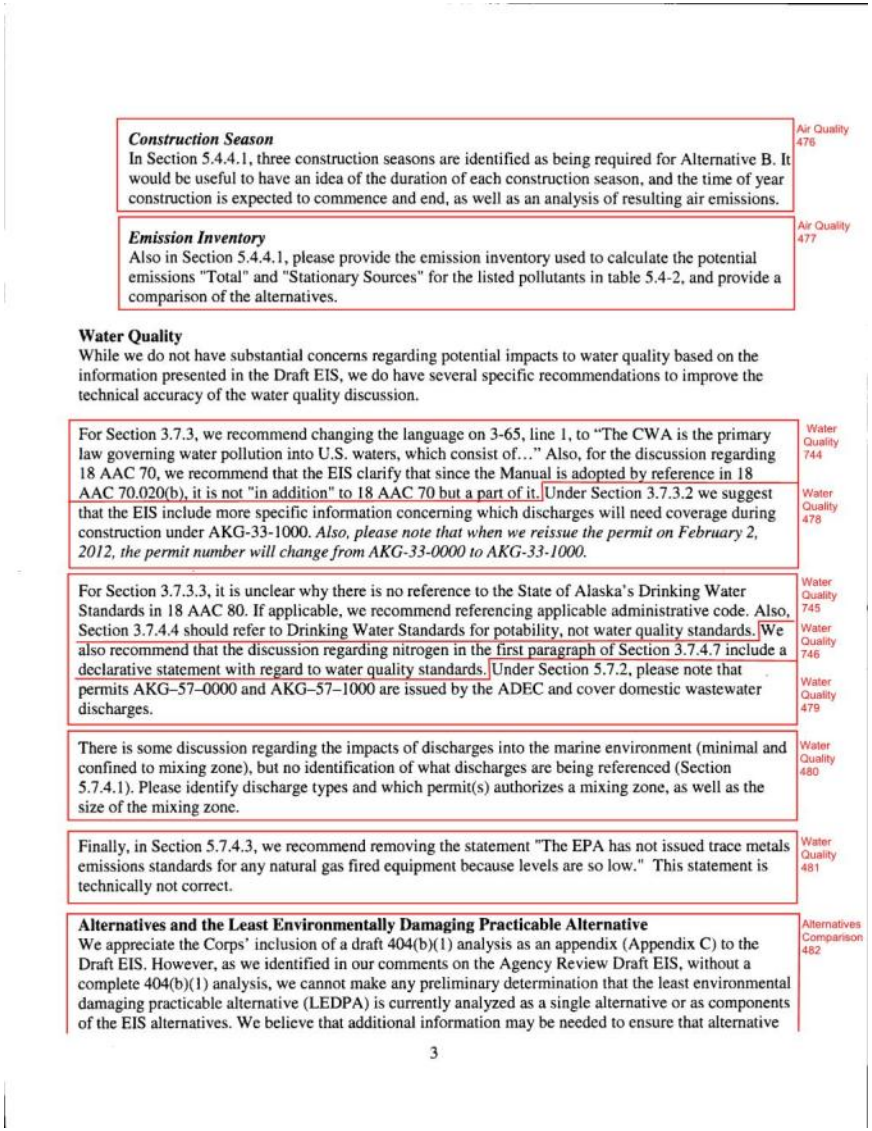
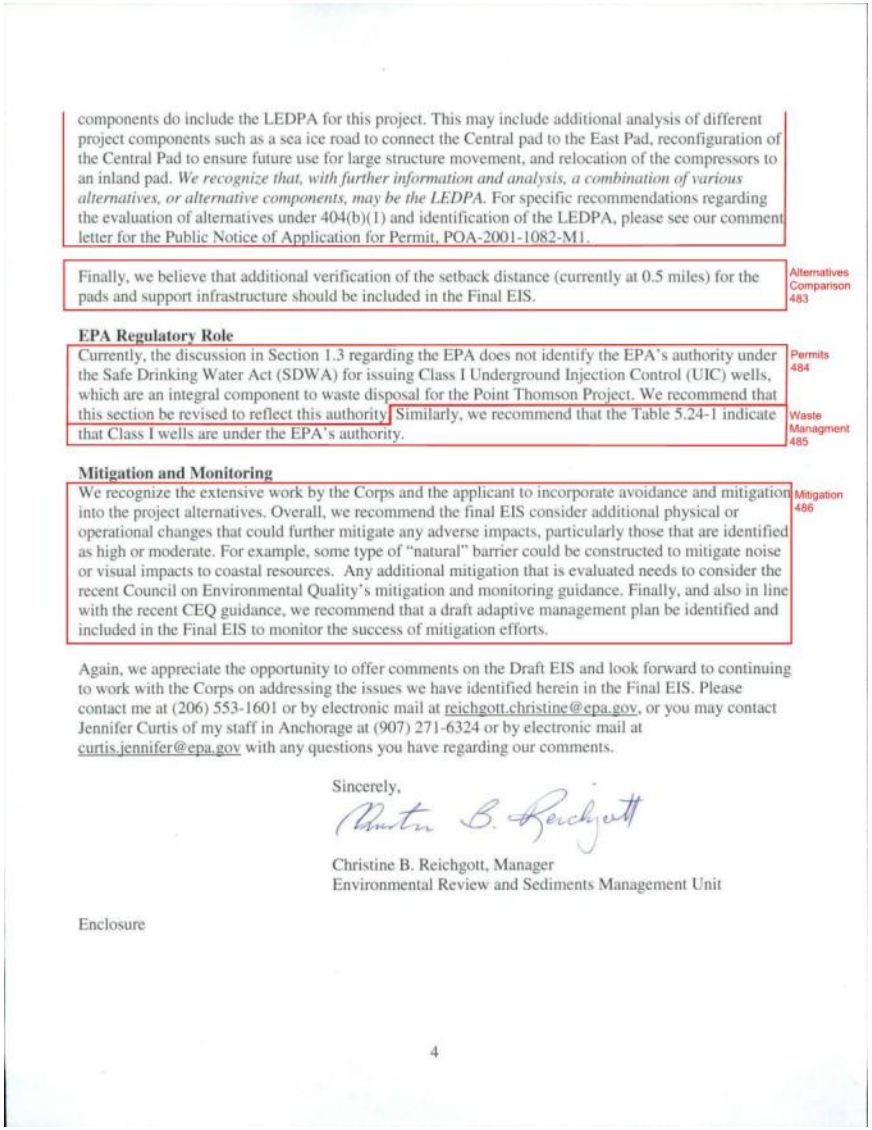
Comment	Response
	472 The following information was added to the end of Section 3.4.5, Ambient Air Quality: "The North Slope is subject to a condition known as "arctic haze." Arctic haze is a condition of reduced visibility in arctic regions. When viewed away from the sun it appears grayish-blue; looking into the sun it appears reddish-brown. It has no distinct upper and lower boundaries. Arctic haze peaks in the spring and is most severe when stable, high-pressure systems produce clear, calm weather (NSIDC 2011). Sampling in the 1970s revealed that the haze was largely composed of industrial pollutants (sulfur compounds and black carbon particles--the products of iron, nickel and copper smelters and inefficient coal-burning plants) from Eurasia (Roznell 1996). Sampling in 2008 indicated that much of the arctic haze at that time was a result of soot from forest fires and burning of farm fields in Eurasia (Roznell 2009). Additionally, submicron organic particles sampled during 2008 and 2009 in Barrow were characteristic of emissions from northern Asia, Siberia, and, to a lesser extent, interior regions of Alaska and Canada (Frossard et al. 2011). The haze is worse in spring due to stagnant air and the lack of precipitation. Conditions improve in the summer, as the atmosphere mixes more and precipitation washes the pollutants from the air." 473 Section 3.4.1, Key Information About Air Quality is a brief summary of Section 3.4. Additional information regarding the monitoring data (e.g., location and dates) is provided in Section 3.4.5, Ambient Air Quality. Section 3.4.5 states: "Information regarding the purpose of these monitoring sites, frequency of monitoring, monitoring methodology, and data quality assurance and quality control can be found in the monitoring reports submitted to ADEC." This text has been changed to: "Additional information regarding the purpose of the monitoring, frequency of monitoring, monitoring methodology, and data quality assurance and quality control is included in the monitoring reports submitted to ADEC. These are provided in Appendix X." 474 The available monitoring data within the study area (defined at the beginning of Section 3.4, Air Quality, as the area from Deadhorse to Point Thomson) are summarized in Table 3.4-3 (see Section 3.4.5, Ambient Air Quality) along with a comparison to the NAAQS. As indicated by the table and associated text, no violations of the standards have occurred. The highest pollutant concentration relative to the NAAQS is the 1-hour concentration for NO_2 (98th percentile of daily maximum 1-hour values over a 1-year period) for the Point Thomson site, which was 70 percent of the respective NAAQS. Detailed monitoring data are now provided in Appendix X. The text in Section 3.4, Air Quality has also been clarified relative to the use of the terms "project area" and "study area." 475 The potential effects of air emissions on human health are addressed in Section 5.23, Human Health. A statement to that effect has been added to Section 5.4.2. Also, Section 5.4.4.6, Other Potential Air Emission-Related Impacts, has been added to address potential deposition impacts.

Comment	Response
	476 The timing of the construction season would vary depending on the project component. The following text has been added to the first paragraph in Section 5.4.4.1: "Figure 2.4-12 in Chapter 2.0 provides the details of the construction seasons for Alternative B." Estimated construction emissions for Alternative B are conservatively shown as the "Total" in Table 5.4 2 and include stationary emission units, mobile sources, and fugitive dust. The construction phase overlaps the primary drilling phase and the start of production operations. Therefore, the "Total" emissions include emissions from drilling and production, as well as construction. Tables 3-2 and 3-3 in the Applicant's air quality permit application (Application for a Prevention of Significant Deterioration Air Quality Construction Permit for the Point Thomson Project, July 2011, Permit No. AQ1201CPT07A) provide detailed summaries of the potential emissions during operation and drilling and during construction and drilling, respectively. Further detail regarding emissions is provided in Appendix B-1 of the air quality permit application. 477 Emission inventories are provided in the Applicant's air quality permit application (see Comment 476). This document is now referenced in the EIS for further details. Emissions were not calculated by the Applicant for Alternative C, D, and E. However, the only differences in emissions between the alternatives would be from mobile sources and drilling. Because the mobile sources are dispersed in time and space (i.e., not concentrated at a single location as with stationary sources), they are not expected to measurably impact the local air quality. For Alternative E, the drilling emissions would be spread out over 5 years but the actual drilling time would be the same as for Alternative B. Under Alternatives C and D, drilling emissions would be greater due to the longer wells. The Corps was not able to provide a quantitative comparison of the emissions associated with each alternative, but the alternatives were compared qualitatively in Section 5.4. Section 5.4.10, Alternatives Comparison and Consequences, has been modified for clarification. 744 The text in Section 3.7.3, Regulations, has been clarified as recommended by the comment. 478 The following text has been added to Section 3.7.3.2, Water Discharges: "Only activities specified in the permit are allowed, such as hydrostatic test water, stormwater, gravel pit dewatering, construction dewatering, and treated discharge from mobile spill response or secondary containment." AKG-33-0000 has been replaced with AKG-33-1000 and this sentence has been removed from Section 5.7.2, Permits: "This permit expired in January 2009 but was proposed for reissuance with a draft permit in July 2011." 745 The title of Section 3.7.3.3 has been changed from "Safe Drinking Water Act" to "Drinking Water Standards," and a statement regarding State of Alaska Drinking Water Standards has been added to the section. The first sentence in Section 3.7.4.4 now states: "A potable water supply is a water supply that meets federal

Comment	Response
	and state drinking water standards and is considered safe and fit for human consumption." 746 Information on the water quality standards for nitrogen has been added to the first paragraph of Section 3.7.4.7, Organic Nutrients, as follows: "The water quality standard for nitrogen as ammonia is dependent on pH for determination of the acute value for freshwater and also whether fish are present. For the chronic value the standard is pH and temperature dependent. For the samples collected during 2002, the acute water quality standard ranged from 17 mg/L to 39.1 mg/L based on the site-specific pH values. The chronic standard ranged from 3.98 mg/L to 6.12 mg/L based on site specific conditions." 479 The existing text in Section 5.7.2, Permits has been modified to state: "General Permits AKG-57-0000 and AKG-57-1000 are issued by the ADEC and cover domestic wastewater discharges during construction and operations to surface freshwaters (including tundra) and marine waters." 480 The reference to a mixing zone in Section 5.7.4.1 under Discharge was intended to refer generally to the area around the discharge point rather than a permit-specified mixing zone. The text has been clarified by replacing "mixing zone" with "area immediately surrounding the discharge point." 481 The referenced text has been removed from Section 5.7.4.3, Alternative B: Operations. 482 Comment noted; no action required.

Comment	Response
	483 In the Applicant's Technical Brief #1, they stated that a "Pad location further inland from the coast will increase the throw on all wells and potentially preclude the ability to reach portions of the reservoir necessary for full field development. This may lead to additional pads being needed in the future to reach bottomhole targets that cannot be reached from a pad that has been located further inland." In other words, a trade-off of moving pads inland would be the potential future need for additional pads closer to the reservoir (i.e., along the coast) in order to reach bottomhole targets, given the present 13,000-foot limit of extended-reach drilling. Through the NEPA process and the 404(b)(1) Guidelines analysis, the Corps will take many factors into consideration, including minimizing impacts, before making a final decision on pad locations. 484 Section 1.3 of the Final EIS has been changed to read, "As currently defined, the project would not require additional EPA-issued permits. However, EPA authority includes oversight of many project-related actions pursuant to the CWA, the Clean Air Act (CAA), the Resource Conservation and Recovery Act (RCRA), the Safe Drinking Water Act (SDWA), and the Oil Pollution Act (OPA)." It is the Corps' understanding that a UIC permit has already been issued for this project. Table 1.6-1 in Chapter 1 lists the UIC well permit and indicates the EPA's authority for the permit. 485 Table 5.24-1 already indicates that an EPA UIC well permit would be required for the Class I disposal well. However, we have added a new footnote to "EPA UIC Well Permit" that states, "EPA would have authority under the SDWA for the Class I UIC well." 486 During the 404(b)(1) Guidelines analysis, the Corps will consider mitigation options along with impacts to the environment identified during the NEPA process before making its final permit decision. An adaptive management plan will not be included in the Final EIS, but will be considered before the Corps makes a final permit decision.

components do include the LEDPA for this project. This may include additional analysis of different project components such as a sea ice road to connect the Central pad to the East Pad, reconfiguration of the Central Pad to ensure future use for large structure movement, and relocation of the compressors to an inland pad. *We recognize that, with further information and analysis, a combination of various alternatives, or alternative components, may be the LEDPA.* For specific recommendations regarding the evaluation of alternatives under 404(b)(1) and identification of the LEDPA, please see our comment letter for the Public Notice of Application for Permit, POA-2001-1082-M1.

Finally, we believe that additional verification of the setback distance (currently at 0.5 miles) for the pads and support infrastructure should be included in the Final EIS. Alternatives Comparison 483

EPA Regulatory Role

Currently, the discussion in Section 1.3 regarding the EPA does not identify the EPA's authority under the Safe Drinking Water Act (SDWA) for issuing Class I Underground Injection Control (UIC) wells, which are an integral component to waste disposal for the Point Thomson Project. We recommend that this section be revised to reflect this authority. Similarly, we recommend that the Table 5.24-1 indicate that Class I wells are under the EPA's authority. Permits 484 Waste Managment 485

Mitigation and Monitoring

We recognize the extensive work by the Corps and the applicant to incorporate avoidance and mitigation into the project alternatives. Overall, we recommend the final EIS consider additional physical or operational changes that could further mitigate any adverse impacts, particularly those that are identified as high or moderate. For example, some type of "natural" barrier could be constructed to mitigate noise or visual impacts to coastal resources. Any additional mitigation that is evaluated needs to consider the recent Council on Environmental Quality's mitigation and monitoring guidance. Finally, and also in line with the recent CEQ guidance, we recommend that a draft adaptive management plan be identified and included in the Final EIS to monitor the success of mitigation efforts. Mitigation 486

Again, we appreciate the opportunity to offer comments on the Draft EIS and look forward to continuing to work with the Corps on addressing the issues we have identified herein in the Final EIS. Please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or by electronic mail at curtis.jennifer@epa.gov with any questions you have regarding our comments.

Sincerely,

Christine B. Reichgott, Manager
Environmental Review and Sediments Management Unit

Enclosure

4

Comment	Response

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements Definitions and Follow-Up Action*

Environmental Impact of the Action

LO – Lack of Objections
The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns
EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections
EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory
EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

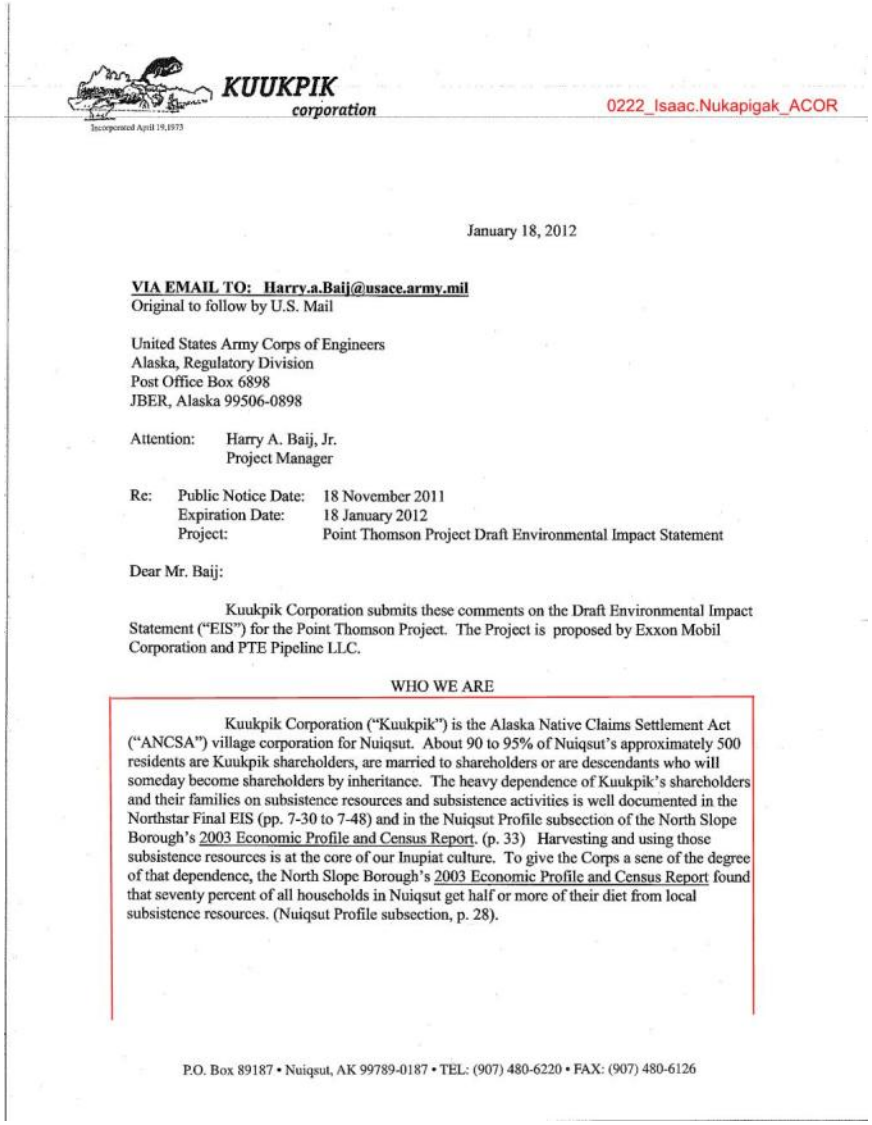
Adequacy of the Impact Statement

Category 1 – Adequate
EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information
The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

Comment	Response
	

KUUKPIK
corporation
Incorporated April 19,1973

0222_Isaac.Nukapigak_ACOR

January 18, 2012

VIA EMAIL TO: Harry.a.Baij@usace.army.mil
Original to follow by U.S. Mail

United States Army Corps of Engineers
Alaska, Regulatory Division
Post Office Box 6898
JBER, Alaska 99506-0898

Attention: Harry A. Baij, Jr.
Project Manager

Re: Public Notice Date: 18 November 2011
Expiration Date: 18 January 2012
Project: Point Thomson Project Draft Environmental Impact Statement

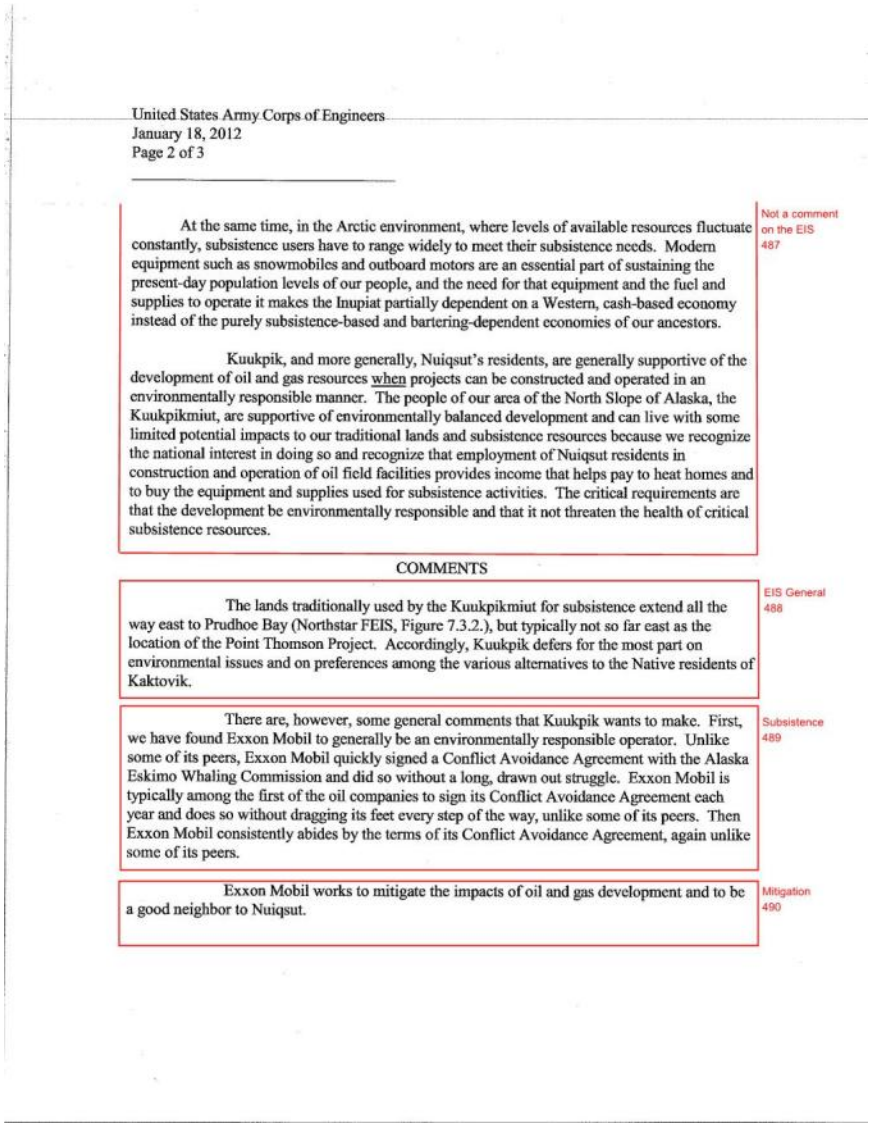
Dear Mr. Baij:

Kuukpik Corporation submits these comments on the Draft Environmental Impact Statement ("EIS") for the Point Thomson Project. The Project is proposed by Exxon Mobil Corporation and PTE Pipeline LLC.

WHO WE ARE

Kuukpik Corporation ("Kuukpik") is the Alaska Native Claims Settlement Act ("ANCSA") village corporation for Nuiqsut. About 90 to 95% of Nuiqsut's approximately 500 residents are Kuukpik shareholders, are married to shareholders or are descendants who will someday become shareholders by inheritance. The heavy dependence of Kuukpik's shareholders and their families on subsistence resources and subsistence activities is well documented in the Northstar Final EIS (pp. 7-30 to 7-48) and in the Nuiqsut Profile subsection of the North Slope Borough's 2003 Economic Profile and Census Report. (p. 33) Harvesting and using those subsistence resources is at the core of our Inupiat culture. To give the Corps a sene of the degree of that dependence, the North Slope Borough's 2003 Economic Profile and Census Report found that seventy percent of all households in Nuiqsut get half or more of their diet from local subsistence resources. (Nuiqsut Profile subsection, p. 28).

P.O. Box 89187 • Nuiqsut, AK 99789-0187 • TEL: (907) 480-6220 • FAX: (907) 480-6126

Comment	Response
	487 Comment noted; no action required. 488 Comment noted; no action required. 489 Comment noted; no action required. 490 Comment noted; no action required.

United States Army Corps of Engineers
January 18, 2012
Page 2 of 3

At the same time, in the Arctic environment, where levels of available resources fluctuate constantly, subsistence users have to range widely to meet their subsistence needs. Modern equipment such as snowmobiles and outboard motors are an essential part of sustaining the present-day population levels of our people, and the need for that equipment and the fuel and supplies to operate it makes the Inupiat partially dependent on a Western, cash-based economy instead of the purely subsistence-based and bartering-dependent economies of our ancestors.

Not a comment on the EIS 487

Kuukpik, and more generally, Nuiqsut's residents, are generally supportive of the development of oil and gas resources when projects can be constructed and operated in an environmentally responsible manner. The people of our area of the North Slope of Alaska, the Kuukpikmiut, are supportive of environmentally balanced development and can live with some limited potential impacts to our traditional lands and subsistence resources because we recognize the national interest in doing so and recognize that employment of Nuiqsut residents in construction and operation of oil field facilities provides income that helps pay to heat homes and to buy the equipment and supplies used for subsistence activities. The critical requirements are that the development be environmentally responsible and that it not threaten the health of critical subsistence resources.

COMMENTS

The lands traditionally used by the Kuukpikmiut for subsistence extend all the way east to Prudhoe Bay (Northstar FEIS, Figure 7.3.2.), but typically not so far east as the location of the Point Thomson Project. Accordingly, Kuukpik defers for the most part on environmental issues and on preferences among the various alternatives to the Native residents of Kaktovik.

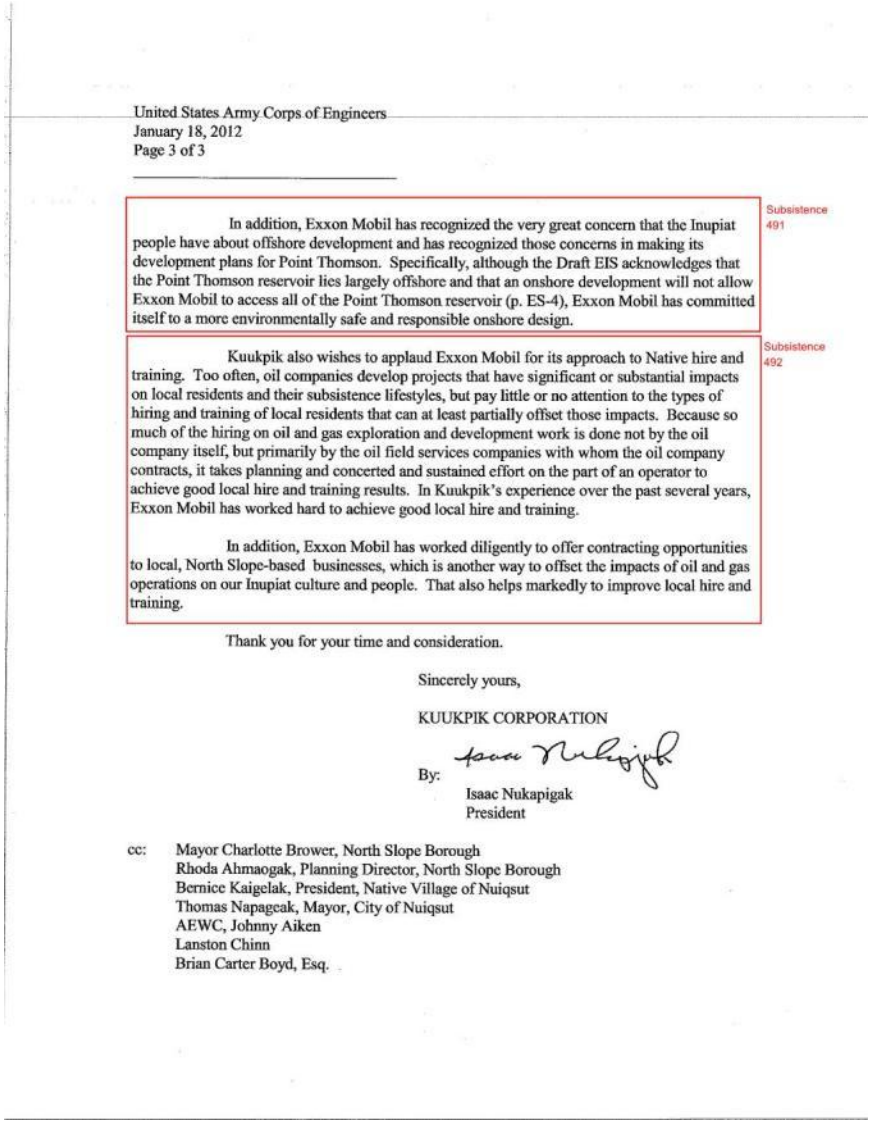
EIS General 488

There are, however, some general comments that Kuukpik wants to make. First, we have found Exxon Mobil to generally be an environmentally responsible operator. Unlike some of its peers, Exxon Mobil quickly signed a Conflict Avoidance Agreement with the Alaska Eskimo Whaling Commission and did so without a long, drawn out struggle. Exxon Mobil is typically among the first of the oil companies to sign its Conflict Avoidance Agreement each year and does so without dragging its feet every step of the way, unlike some of its peers. Then Exxon Mobil consistently abides by the terms of its Conflict Avoidance Agreement, again unlike some of its peers.

Subsistence 489

Exxon Mobil works to mitigate the impacts of oil and gas development and to be a good neighbor to Nuiqsut.

Mitigation 490

Comment	Response
	491 Comment noted; no action required. 492 Comment noted; no action required.

Subsistence 491

In addition, Exxon Mobil has recognized the very great concern that the Inupiat people have about offshore development and has recognized those concerns in making its development plans for Point Thomson. Specifically, although the Draft EIS acknowledges that the Point Thomson reservoir lies largely offshore and that an onshore development will not allow Exxon Mobil to access all of the Point Thomson reservoir (p. ES-4), Exxon Mobil has committed itself to a more environmentally safe and responsible onshore design.

Subsistence 492

Kuukpik also wishes to applaud Exxon Mobil for its approach to Native hire and training. Too often, oil companies develop projects that have significant or substantial impacts on local residents and their subsistence lifestyles, but pay little or no attention to the types of hiring and training of local residents that can at least partially offset those impacts. Because so much of the hiring on oil and gas exploration and development work is done not by the oil company itself, but primarily by the oil field services companies with whom the oil company contracts, it takes planning and concerted and sustained effort on the part of an operator to achieve good local hire and training results. In Kuukpik's experience over the past several years, Exxon Mobil has worked hard to achieve good local hire and training.

In addition, Exxon Mobil has worked diligently to offer contracting opportunities to local, North Slope-based businesses, which is another way to offset the impacts of oil and gas operations on our Inupiat culture and people. That also helps markedly to improve local hire and training.

Thank you for your time and consideration.

Sincerely yours,

KUUKPIK CORPORATION

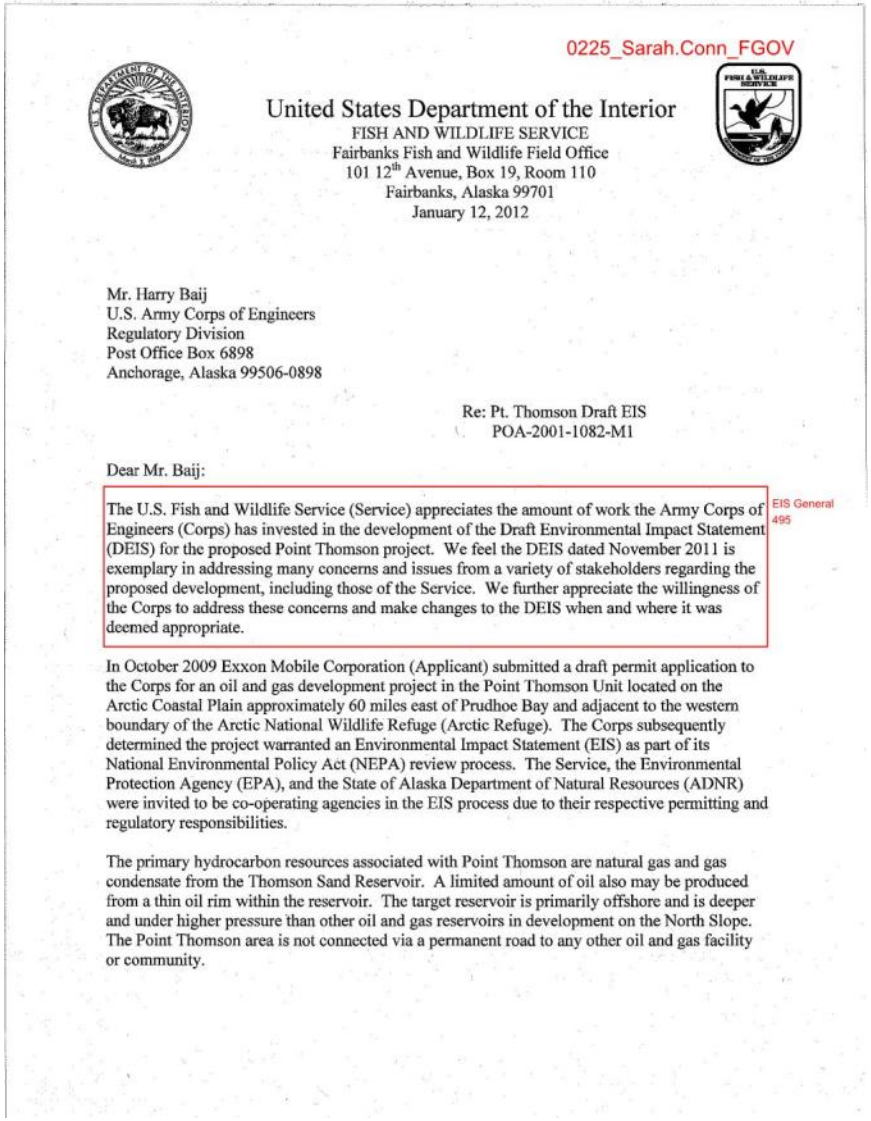
By: Isaac Nukapigak
President

cc: Mayor Charlotte Brower, North Slope Borough
Rhoda Ahmaogak, Planning Director, North Slope Borough
Bernice Kaigelak, President, Native Village of Nuiqsut
Thomas Napageak, Mayor, City of Nuiqsut
AEWC, Johnny Aiken
Lanston Chinn
Brian Carter Boyd, Esq.

Comment	Response
0223_Jim.Sampson_NGO January 17, 2012 Department of the Army U.S. Army Engineers District, Alaska Regulatory Division P.O. Box 6898 JBER, Alaska 99506-0898 Re: Point Thomson Project Draft Environmental Impact Statement (EIS) Dear Sir: Statement of Support for Alternative B 493 This letter is being written in support of responsible and transparent oil and gas development. After review of the Point Thomson Project Draft Environmental Impact Statement (EIS), it is clear that proposed Alternative B is an environmentally responsible approach to oil and gas development for the Point Thomson area. It is also clear that the EIS process has provided publicly available transparency; which is not only a requisite for legal compliance with the National Environmental Policy Act (NEPA), but more importantly ensures the opportunity for public trust. Again, my conclusion is that proposed Alternative B is an environmentally responsible approach to oil and gas development in the Point Thomson area. I further conclude that the EIS process has been open, transparent and logical. The linear approach to NEPA and the subsequent EIS is apparent: • Establish and review development alternatives • Balance the need for resource development with environmental risk • Consider economic risk • Mitigate both environmental and economic risk • Identify the least environmentally damaging practical alternative (LEDPA) • Determine whether or not the LEDPA is in compliance with federal laws, associated regulations and executive order • Ensure meaningful public comment • Make a record of decision	493 Comment noted; no action required.

Comment	Response
Further, as Director of the Fairbanks Pipeline Training Center, I am particularly concerned that Alaskans First Indigenous Peoples affected by the development be provided the first opportunity for employment to help mitigate disruptions to their rural subsistence lifestyle. In order to effectively take advantage of employment opportunities, Alaska's First People of the Arctic must be trained to acquire the needed technical and safety skill sets for employment. The Fairbanks Pipeline Training Center commits to an active outreach effort to ensure that these Alaskans are afforded the opportunity to acquire the necessary and appropriate training, thereby assuring them the first opportunity for employment. Additionally, the training center, in cooperation with our jointly federally registered apprenticeship partners, is prepared to provide spill prevention and mitigation training to those who participate in the development of the Point Thomson area. In closing, let me restate that because of the information I was able to get from the EIS and because of the logical and open EIS process, I support proposed Alternative B for Point Thomson development. Sincerely, Jim Sampson Director Cc: Board of Trustees, Fairbanks Pipeline Training Center Trust Commissioner of Labor Click Bishop John Ellsworth, Alaska Frontier Construction	

Comment	Response
Representative Mike Hawker Alaska State Legislature 0224_Mike.Hawker_SGOV *Session:* State Capitol Juneau, AK 99801 907 465-4949 direct 800 478-4950 toll free 907 465-4979 fax *Interim:* 716 W 4th Avenue Anchorage, AK 99501 907 269-0244 office 907 269-0248 fax *House District 32:* *Eagle River* *Anchorage* *Rainbow* *Indian* *Bird* *Girdwood* *Portage* *Whittier* *Sunrise* *Hope* Jan. 17, 2012 Harry A. Baij Jr., Project Manager U.S. Army Corp of Engineers Alaska, Regulatory Division P.O. Box 6898 JBER, Alaska 99506-0898 RE: Pt. Thomson Project Draft Environmental Impact Statement (DEIS) Mr. Baij, Statement of Support for Alternative B 494 Please accept these comments in support of your selection of Alternative B as the preferred alternative in the Pt. Thomson Project DEIS. With an estimated 8 trillion cubic feet of natural gas and 200 million barrels of condensate, the Pt. Thomson development holds a quarter of the known North Slope gas resource and as such will be the lynchpin to a successful Alaska gas pipeline project, to the Lower 48 or for export as markets allow. Development of a gas pipeline is expected to extend the economic life of other North Slope hydrocarbon plays that support Alaska's economy and thousands of jobs, while providing a reliable supply of clean-burning American energy. Careful review of the DEIS compels me to support Alternative B, which I believe is conscientiously designed to best meet the unique geographic, environmental and human concerns on our Alaska North Slope, while also providing a foundation for a safe, responsible and reasonable project the proponents will be able to succeed in. This alternative combines several seasonal approaches that should minimize the project's environmental footprint while allowing efficient operations. I appreciate your consideration of these comments in support of your prompt action selecting Alternative B as the preferred alternative in the Pt. Thomson Project DEIS. Development of this project is critical for Alaska, and for the nation. Respectfully, Representative Mike Hawker Alaska State Legislature, House District 32 Rep.Mike.Hawker@legis.state.ak.us • http://www.akrepublicans.org/hawker/	494 Comment noted; no action required.

Comment	Response
	495 Comment noted; no action required.

0225_Sarah.Conn_FGOV

United States Department of the Interior
FISH AND WILDLIFE SERVICE
Fairbanks Fish and Wildlife Field Office
101 12th Avenue, Box 19, Room 110
Fairbanks, Alaska 99701
January 12, 2012

Mr. Harry Baij
U.S. Army Corps of Engineers
Regulatory Division
Post Office Box 6898
Anchorage, Alaska 99506-0898

Re: Pt. Thomson Draft EIS
POA-2001-1082-M1

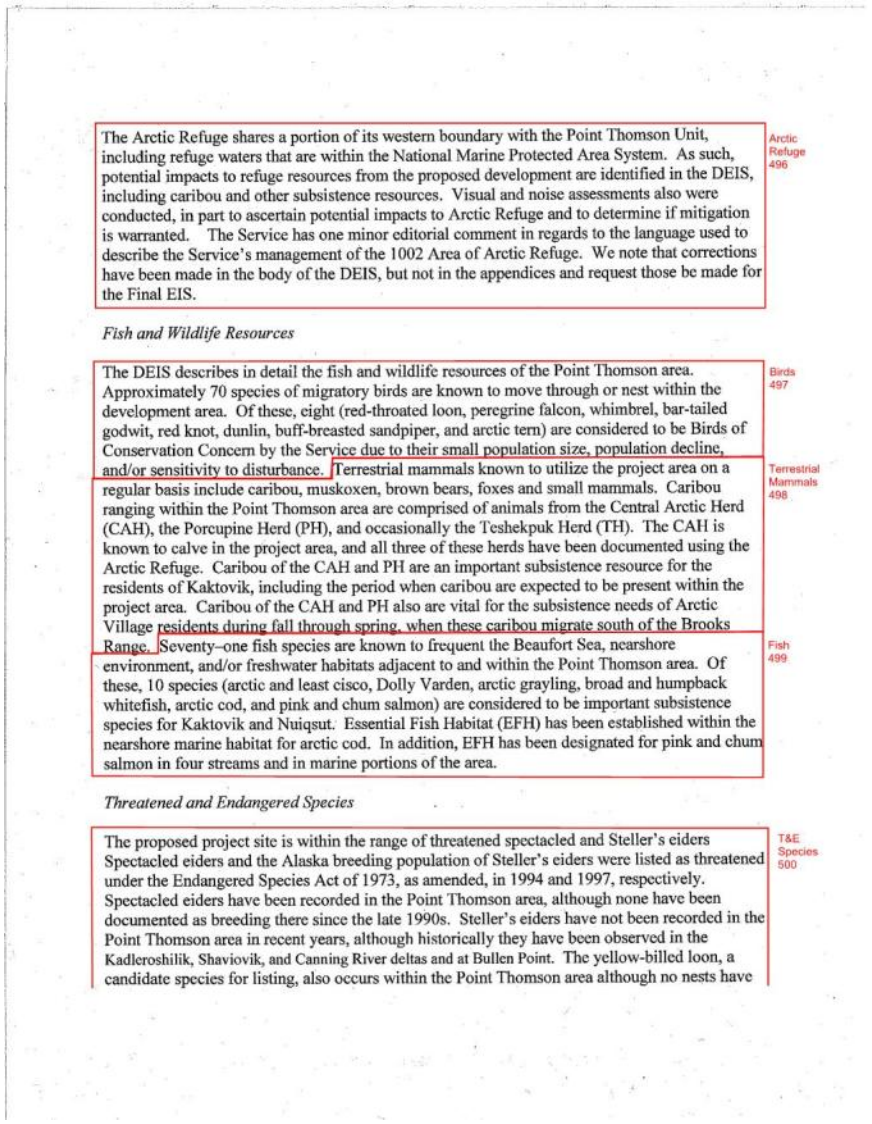
Dear Mr. Baij:

The U.S. Fish and Wildlife Service (Service) appreciates the amount of work the Army Corps of Engineers (Corps) has invested in the development of the Draft Environmental Impact Statement (DEIS) for the proposed Point Thomson project. We feel the DEIS dated November 2011 is exemplary in addressing many concerns and issues from a variety of stakeholders regarding the proposed development, including those of the Service. We further appreciate the willingness of the Corps to address these concerns and make changes to the DEIS when and where it was deemed appropriate.

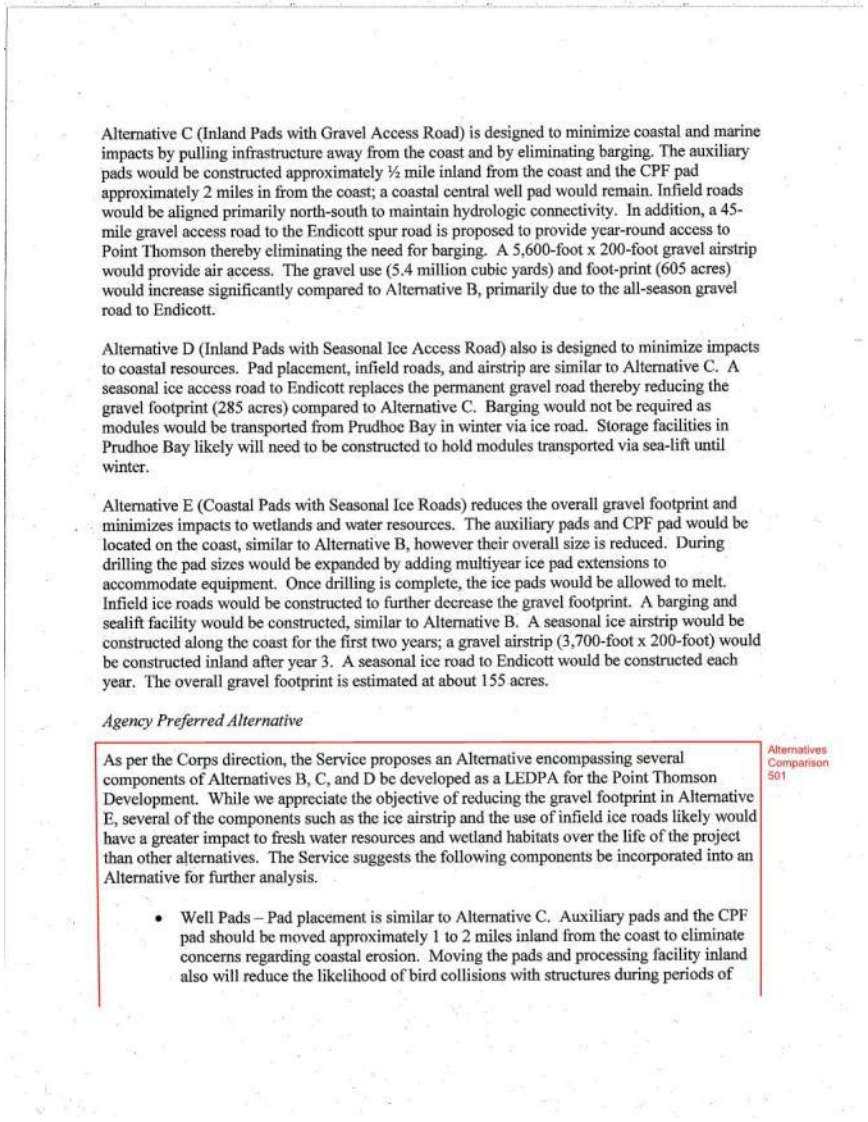
EIS General 495

In October 2009 Exxon Mobile Corporation (Applicant) submitted a draft permit application to the Corps for an oil and gas development project in the Point Thomson Unit located on the Arctic Coastal Plain approximately 60 miles east of Prudhoe Bay and adjacent to the western boundary of the Arctic National Wildlife Refuge (Arctic Refuge). The Corps subsequently determined the project warranted an Environmental Impact Statement (EIS) as part of its National Environmental Policy Act (NEPA) review process. The Service, the Environmental Protection Agency (EPA), and the State of Alaska Department of Natural Resources (ADNR) were invited to be co-operating agencies in the EIS process due to their respective permitting and regulatory responsibilities.

The primary hydrocarbon resources associated with Point Thomson are natural gas and gas condensate from the Thomson Sand Reservoir. A limited amount of oil also may be produced from a thin oil rim within the reservoir. The target reservoir is primarily offshore and is deeper and under higher pressure than other oil and gas reservoirs in development on the North Slope. The Point Thomson area is not connected via a permanent road to any other oil and gas facility or community.

Comment	Response
	496 Changes regarding management of the 1002 Area have been made in Appendix N, Visual Resource Assessment, and in the body of the EIS to correct language that stated or suggested that the 1002 Area was designated as a wilderness study area, to help clarify distinctions between the dictionary definition of "wilderness" and the designated unit of the National Wilderness Preservation System, and to clarify how the USFWS actually manages the area. These changes have occurred primarily in the following EIS sections: Land Use, Management, and Ownership; Arctic National Wildlife Refuge; Recreation; and Visual Aesthetics, as well as in Appendix N. 497 Birds of concern to the USFWS, ADF&G, and other conservation organizations are discussed in Section 3.9.8, Conservation Birds of Concern and listed in Table 3.9-2. The potential impacts of the Point Thomson project on bird species of concern are discussed in Section 5.9, Birds. Red-throated loons, peregrine falcons, whimbrels, bar-tailed godwits, red knots, dunlin, buff-breasted sandpipers, and arctic terns are included in the analysis of impacts. 498 Each of these species is described in Section 3.10 (Terrestrial Mammals) and the potential impacts to these species from each of the alternatives are analyzed in Section 5.10. The CAH, PH, and TH are each discussed in sections 3.10 and 5.10. In addition, subsistence is discussed in sections 3.22 and 5.22 (Subsistence and Traditional Land-Use Patterns). 499 The species of fish most likely to be affected by the Point Thomson Project (including arctic and least cisco, Dolly Varden, arctic grayling, broad and humpback whitefish, arctic cod, and pink and chum salmon) are discussed in Chapters 3 and 5. Potential impacts on fish subsistence harvest for the villages of Kaktovik and Nuiqsut are also discussed in the EIS. EFH impacts are assessed in the EIS and an EFH Assessment has been submitted to the NMFS in compliance with the Magnuson-Stevens Fishery Conservation and Management Act. 500 Spectacled and Steller's eiders, yellow-billed loons, and the polar bear are discussed in the EIS and impacts to these species are evaluated including impacts to critical habitat. The final Biological Assessment for Spectacled Eider, Steller's Eider, Yellow-billed Loon, and Polar Bear was submitted to the USFWS in January 2012 as part of the ESA consultation process.

Comment	Response
been located. Draft Biological Assessments for the spectacled and Steller's eider and yellow-billed loon are included in the DEIS. The Polar Bear was listed as a threatened species in May 2008, primarily due to concerns regarding the threat to habitat posed by the trend of diminishing sea ice cover and thickness in the Arctic Ocean, primarily during the summer. Critical habitat for the polar bear was designated by the Service in December 2010. There are three critical habitat units designated: (1) sea ice habitat over the continental shelf; (2) terrestrial denning habitat; and (3) barrier island habitat. All three of these habitats are found within the Point Thomson area. A draft Biological Assessment for the Polar Bear is included in the DEIS. The Service will develop Biological Opinions for both the spectacled and Steller's eiders and polar bear as soon as soon as the respective BAs are finalized by the Corps. *Alternatives* The EIS outlines five alternatives (Alternatives A-E), including a No-Action Alternative (Alternative A) and the Applicant's Proposal (Alternative B), for the development of oil and gas resources within the Point Thomson Unit. Alternatives C-E include components designed to minimize impacts to coastal resources, wetlands, and/or the hydrology of the Point Thomson area while allowing for production of oil and gas resources. All alternatives utilize onshore pads and pipelines. Although the Thomson Sand Reservoir is located primarily offshore, the use of onshore facilities and extended-reach drilling to access the reserves is deemed to be the most efficient method and poses the least amount of risk to the marine environment. While the Corps does not identify a Least Environmentally Damaging Practicable Alternative (LEDPA) in the DEIS, reviewers are encouraged to suggest a LEDPA either by selecting an existing Alternative, creating an Alternative using components of existing Alternatives, or by creating an entirely new Alternative. The No Action Alternative (Alternative A) does not allow for further development of the Point Thomson Field, however it does include continued monitoring of the two drilled and capped production wells on the existing Central Pad. Access to and from the pad would be via helicopter. Alternative B (the Applicant's proposed action) includes placing 2.2 million cubic yards of gravel fill material into approximately 215 acres of wetlands to construct a 55-acre central processing facility (CPF) pad, 2 (east and west) auxiliary pads, a 5,600-ft by 200-ft airstrip, 12 miles of infield roads, associated infield pipelines, a 58-acre gravel pit, a service pier, and sealift facility. The auxiliary pads and central pad would be located on the coast to maximize the efficacy of the extended reach drilling. Infield roads and pipelines connecting the east and west pads to the central pad generally would parallel the coastline. The proposed development would be connected to Prudhoe Bay and the Trans-Alaska Pipeline (TAPS) via an export pipeline elevated on Vertical Support Members (VSMs) and a 60-mile seasonal ice road.	

Comment	Response
	501 The Corps will evaluate fully all of the alternatives and all of the components in determining whether the Applicant's proposed project is the LEDPA.

Alternative C (Inland Pads with Gravel Access Road) is designed to minimize coastal and marine impacts by pulling infrastructure away from the coast and by eliminating barging. The auxiliary pads would be constructed approximately ½ mile inland from the coast and the CPF pad approximately 2 miles in from the coast; a coastal central well pad would remain. Infield roads would be aligned primarily north-south to maintain hydrologic connectivity. In addition, a 45-mile gravel access road to the Endicott spur road is proposed to provide year-round access to Point Thomson thereby eliminating the need for barging. A 5,600-foot x 200-foot gravel airstrip would provide air access. The gravel use (5.4 million cubic yards) and foot-print (605 acres) would increase significantly compared to Alternative B, primarily due to the all-season gravel road to Endicott.

Alternative D (Inland Pads with Seasonal Ice Access Road) also is designed to minimize impacts to coastal resources. Pad placement, infield roads, and airstrip are similar to Alternative C. A seasonal ice access road to Endicott replaces the permanent gravel road thereby reducing the gravel footprint (285 acres) compared to Alternative C. Barging would not be required as modules would be transported from Prudhoe Bay in winter via ice road. Storage facilities in Prudhoe Bay likely will need to be constructed to hold modules transported via sea-lift until winter.

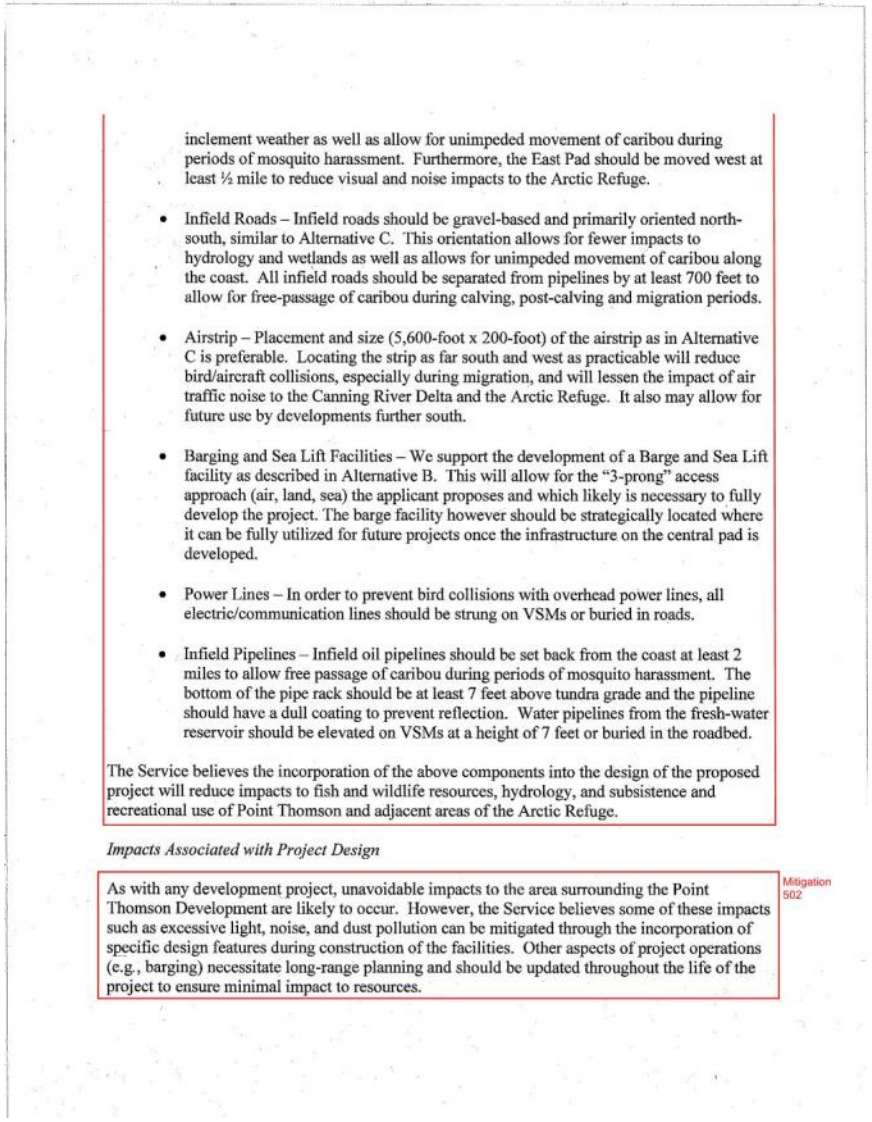
Alternative E (Coastal Pads with Seasonal Ice Roads) reduces the overall gravel footprint and minimizes impacts to wetlands and water resources. The auxiliary pads and CPF pad would be located on the coast, similar to Alternative B, however their overall size is reduced. During drilling the pad sizes would be expanded by adding multiyear ice pad extensions to accommodate equipment. Once drilling is complete, the ice pads would be allowed to melt. Infield ice roads would be constructed to further decrease the gravel footprint. A barging and sealift facility would be constructed, similar to Alternative B. A seasonal ice airstrip would be constructed along the coast for the first two years; a gravel airstrip (3,700-foot x 200-foot) would be constructed inland after year 3. A seasonal ice road to Endicott would be constructed each year. The overall gravel footprint is estimated at about 155 acres.

Agency Preferred Alternative

As per the Corps direction, the Service proposes an Alternative encompassing several components of Alternatives B, C, and D be developed as a LEDPA for the Point Thomson Development. While we appreciate the objective of reducing the gravel footprint in Alternative E, several of the components such as the ice airstrip and the use of infield ice roads likely would have a greater impact to fresh water resources and wetland habitats over the life of the project than other alternatives. The Service suggests the following components be incorporated into an Alternative for further analysis.

Alternatives Comparison 501

- Well Pads – Pad placement is similar to Alternative C. Auxiliary pads and the CPF pad should be moved approximately 1 to 2 miles inland from the coast to eliminate concerns regarding coastal erosion. Moving the pads and processing facility inland also will reduce the likelihood of bird collisions with structures during periods of

Comment	Response
	502 The implementation of an adaptive management plan as part of potential mitigation will be considered before the Corps makes a final permit decision.

inclement weather as well as allow for unimpeded movement of caribou during periods of mosquito harassment. Furthermore, the East Pad should be moved west at least ½ mile to reduce visual and noise impacts to the Arctic Refuge.

- Infield Roads – Infield roads should be gravel-based and primarily oriented north-south, similar to Alternative C. This orientation allows for fewer impacts to hydrology and wetlands as well as allows for unimpeded movement of caribou along the coast. All infield roads should be separated from pipelines by at least 700 feet to allow for free-passage of caribou during calving, post-calving and migration periods.

- Airstrip – Placement and size (5,600-foot x 200-foot) of the airstrip as in Alternative C is preferable. Locating the strip as far south and west as practicable will reduce bird/aircraft collisions, especially during migration, and will lessen the impact of air traffic noise to the Canning River Delta and the Arctic Refuge. It also may allow for future use by developments further south.

- Barging and Sea Lift Facilities – We support the development of a Barge and Sea Lift facility as described in Alternative B. This will allow for the "3-prong" access approach (air, land, sea) the applicant proposes and which likely is necessary to fully develop the project. The barge facility however should be strategically located where it can be fully utilized for future projects once the infrastructure on the central pad is developed.

- Power Lines – In order to prevent bird collisions with overhead power lines, all electric/communication lines should be strung on VSMs or buried in roads.

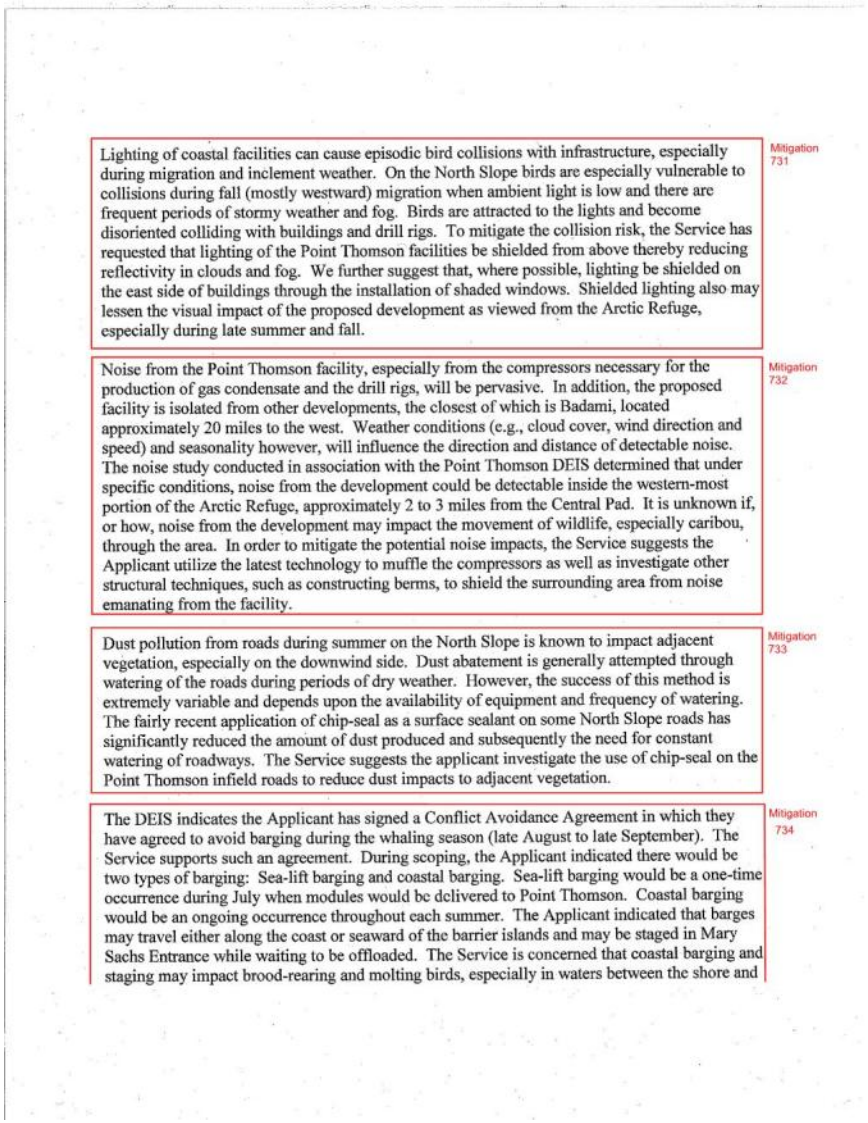
- Infield Pipelines – Infield oil pipelines should be set back from the coast at least 2 miles to allow free passage of caribou during periods of mosquito harassment. The bottom of the pipe rack should be at least 7 feet above tundra grade and the pipeline should have a dull coating to prevent reflection. Water pipelines from the fresh-water reservoir should be elevated on VSMs at a height of 7 feet or buried in the roadbed.

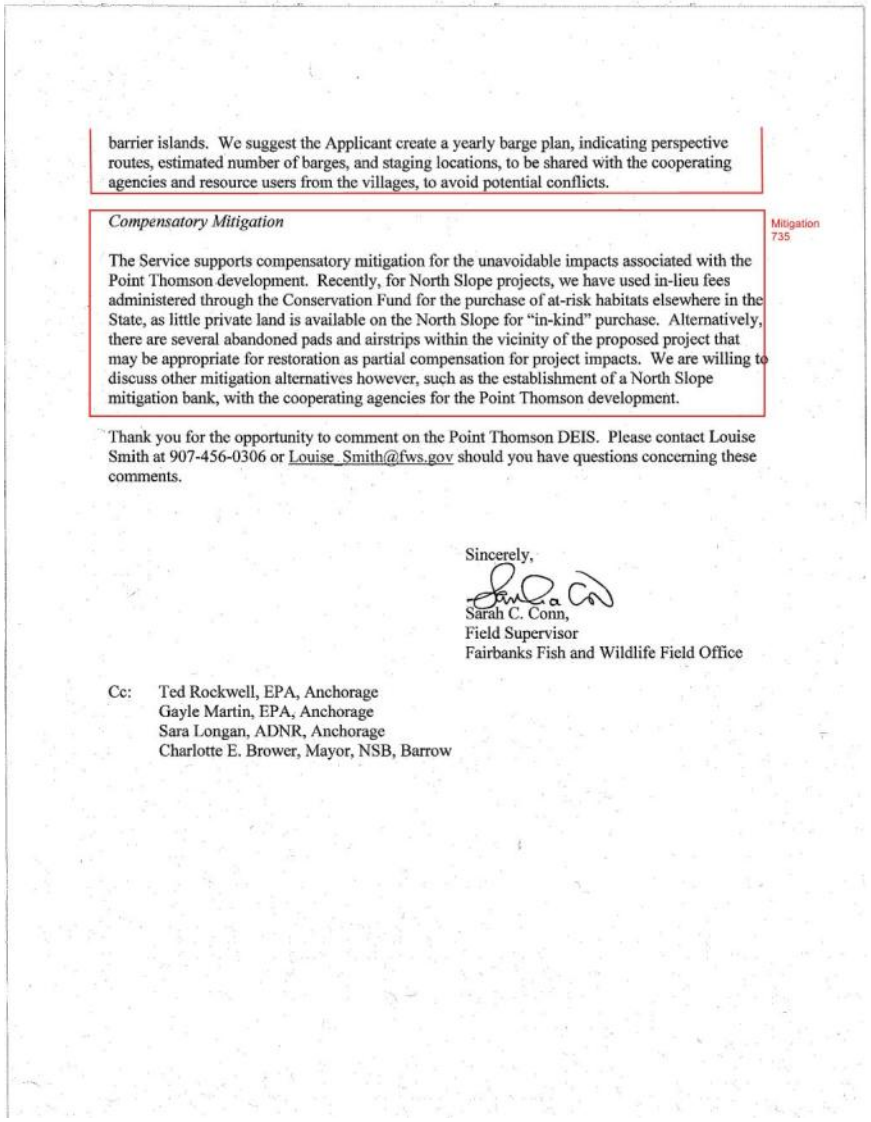
The Service believes the incorporation of the above components into the design of the proposed project will reduce impacts to fish and wildlife resources, hydrology, and subsistence and recreational use of Point Thomson and adjacent areas of the Arctic Refuge.

Impacts Associated with Project Design

As with any development project, unavoidable impacts to the area surrounding the Point Thomson Development are likely to occur. However, the Service believes some of these impacts such as excessive light, noise, and dust pollution can be mitigated through the incorporation of specific design features during construction of the facilities. Other aspects of project operations (e.g., barging) necessitate long-range planning and should be updated throughout the life of the project to ensure minimal impact to resources.

Mitigation 502

Comment	Response
	731 During the 404(b)(1) Guidelines analysis, the Corps will consider mitigation options to reduce lighting impacts along with those impacts that were identified during the NEPA process before making its final permit decision. 732 During the 404(b)(1) Guidelines analysis, the Corps will consider mitigation options for noise along with impacts to the environment identified during the NEPA process before making its final permit decision. 733 The use of chemical dust palliatives will be considered as a measure to mitigate fugitive dust. 734 As stated in the comment, sea-lift barges are expected to be a one-time occurrence. They are also the barges that may be staged while waiting to be offloaded. The Corps does not anticipate the need for coastal barges to be staged. During the 404(b)(1) Guidelines analysis, the Corps will consider mitigation options, including barge plans, along with impacts to the environment identified during the NEPA process before making its final permit decision.

Comment	Response
	735 During the 404(b)(1) Guidelines analysis, the Corps will consider mitigation options, including possible compensatory mitigation, along with impacts to the environment identified during the NEPA process before making its final permit decision. A discussion of compensatory mitigation is provided in Section 4.4.5.2.

barrier islands. We suggest the Applicant create a yearly barge plan, indicating perspective routes, estimated number of barges, and staging locations, to be shared with the cooperating agencies and resource users from the villages, to avoid potential conflicts.

Compensatory Mitigation

Mitigation 735

The Service supports compensatory mitigation for the unavoidable impacts associated with the Point Thomson development. Recently, for North Slope projects, we have used in-lieu fees administered through the Conservation Fund for the purchase of at-risk habitats elsewhere in the State, as little private land is available on the North Slope for "in-kind" purchase. Alternatively, there are several abandoned pads and airstrips within the vicinity of the proposed project that may be appropriate for restoration as partial compensation for project impacts. We are willing to discuss other mitigation alternatives however, such as the establishment of a North Slope mitigation bank, with the cooperating agencies for the Point Thomson development.

Thank you for the opportunity to comment on the Point Thomson DEIS. Please contact Louise Smith at 907-456-0306 or Louise_Smith@fws.gov should you have questions concerning these comments.

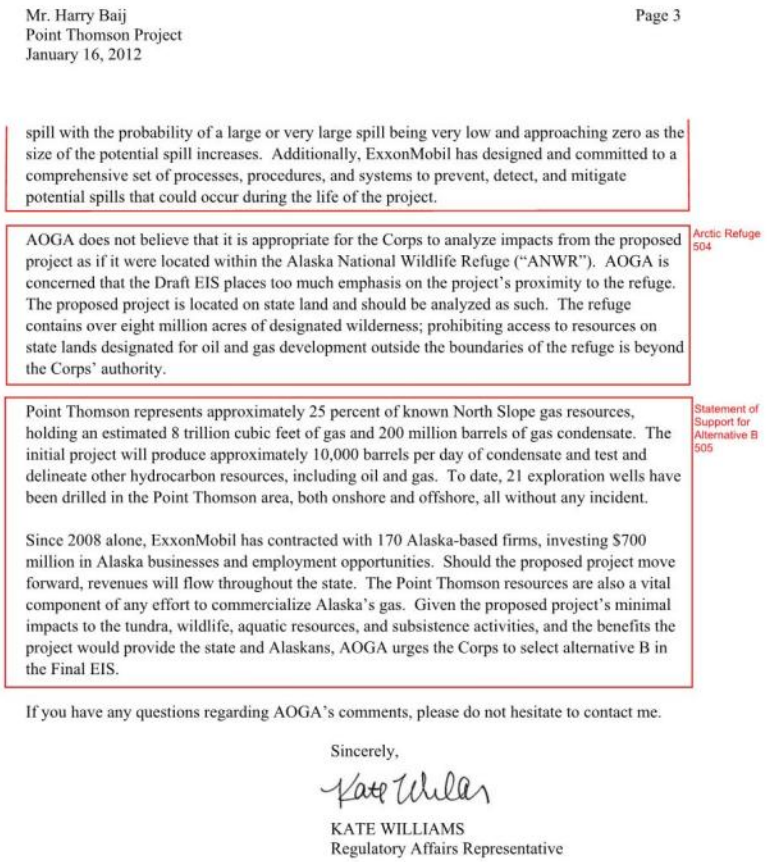
Sincerely,

Sarah C. Conn,
Field Supervisor
Fairbanks Fish and Wildlife Field Office

Cc: Ted Rockwell, EPA, Anchorage
Gayle Martin, EPA, Anchorage
Sara Longan, ADNR, Anchorage
Charlotte E. Brower, Mayor, NSB, Barrow

Comment	Response
Alaska Oil and Gas Association 0226_Kate.Williams_NGO AOGA 121 W. Fireweed Lane, Suite 207 Anchorage, Alaska 99503-2035 Phone: (907) 272-1481 Fax: (907) 279-8114 Email: williams@aoga.org *Kate Williams, Regulatory Affairs Representative* January 16, 2012 Mr. Harry Baij Jr. Department of the Army U.S. Army Engineer District, Alaska Regulatory Division P.O. Box 6898 JBER, Alaska 99506-0898 **Re: Comments on the Point Thomson Project Draft Environmental Impact Statement (EIS No. 20110387)** Dear Mr. Baij: The Alaska Oil and Gas Association ("AOGA") appreciates this opportunity to submit comments on the Draft Environmental Impact Statement ("EIS") for the Point Thomson Project. AOGA is a private, nonprofit trade association whose 16 member companies account for the majority of oil and gas exploration, development, production, transportation, refining, and marketing activities in the state. 503 Statement of Support for Alternative B AOGA strongly supports alternative B, the proposed project. ExxonMobil Corporation ("ExxonMobil") submitted its draft application for wetlands permits in October 2009 initiating the EIS process. Since then, Exxon Mobil has provided the U.S. Army Corps of Engineers ("Corps") extensive support, including responding to 82 requests for information, 22 follow-ups, hosting 23 workshops on the proposed project, and facilitating or funding field studies such as wetlands vegetation mapping, noise studies and eider and yellow-billed loon surveys. The proposed project is the safest, most environmentally sound and economic option of the action alternatives and should be selected as the preferred alternative in the Final EIS. Action alternatives C, D and E all prohibit or require project components which would have a greater impact on the environment than the proposed project. For example, alternatives C and D prohibit barging which would necessitate a substantial increase in truck traffic. Instead of barging, alternative C proposes a 44-mile gravel road from Point Thomson to the Prudhoe Bay road system that would require an additional 336 acres of gravel and five additional mines, located about every 10 miles along the proposed road corridor, and create a much larger tundra footprint. Importantly, the road would not be built in time to facilitate construction and drilling	503 Comment noted; no action required.

Comment	Response
Mr. Harry Baij Point Thomson Project January 16, 2012 Page 2 resulting in environmental and operational issues associated with more limited air and overland access issues. In fact, during project construction, an estimated 7.5 million gallons of fuel would have to be trucked to Point Thomson via ice road and stored to fuel all activities before the next ice road is functional. As the Corps acknowledges, it would take one fuel truck per hour, 24 hours a day leaving Deadhorse for Point Thomson for the entire ice road season to deliver that amount of fuel. Conversely, barging has long been established as a safe means of delivering supplies to coastal communities throughout the state. Approximately 188 barge trips have taken place in support of the Point Thomson project since 2008 with no adverse impacts to marine mammals or subsistence use. The barge route is located inside barrier islands away from the main fall migration corridor for bowhead whale, consistent with the Alaska Eskimo Whaling Commission Conflict Avoidance Agreement ("CAA"). Should the proposed project move forward, barging operations would continue to be conducted in accordance with the CAA and in direct consultation with local whaling communities. Alternative E would eliminate infield gravel roads and shorten the project's proposed airstrip by almost 2000 feet, instead relying solely on helicopters and seasonally limited off-road vehicles for transportation. This would create unnecessary safety risks as well as emergency response limitations and operational inefficiencies. Compared to the proposed project, the shorter airstrip would triple fixed-wing air traffic during construction and increase air traffic by 40 percent during operations, adding to any noise disturbances. The infield roads associated with the proposed project have been routed to minimize the gravel footprint and maintain natural drainage patterns; no new streams would be created nor would existing streams be eliminated, and bridges would be constructed to ensure anadromous fish passage. In comparison, moving roads inland as proposed in alternatives C and D would increase the project's gravel footprint by 30 percent and have greater impacts on drainage patterns and fish passage. The proposed project has been designed to have minimal impacts on subsistence activities. Residents of Kaktovik, the nearest community to the Point Thomson project area, were consulted and their input incorporated into the design of the proposed project such as pipelines being elevated at least seven feet above the tundra to allow free passage by wildlife and subsistence hunters, textured and coated pipelines to reduce glare and contrast, and thicker pipeline walls to withstand accidental bullet strikes from hunters. Of the action alternatives, the proposed project has the least potential to affect polar bears and polar bear critical habitat. Generally speaking, ExxonMobil has and will continue to have strong marine mammal and wildlife protection plans in place, which the U.S. Fish and Wildlife Service has recognized as a North Slope industry best practice. As the Corps recognizes, based on historical data and the reservoir conditions at Point Thomson, the most likely spill scenario under any of the action alternatives would be a very small or small	

Comment	Response
	504 The EIS includes a separate section on the Arctic Refuge due to its proximity to the project and the Thomson Sand Reservoir. Section 3.13, Land Use, Land Ownership, and Land Management, explicitly states that the Point Thomson project area is located on land owned and managed by the State of Alaska. 505 Comment noted; no action required

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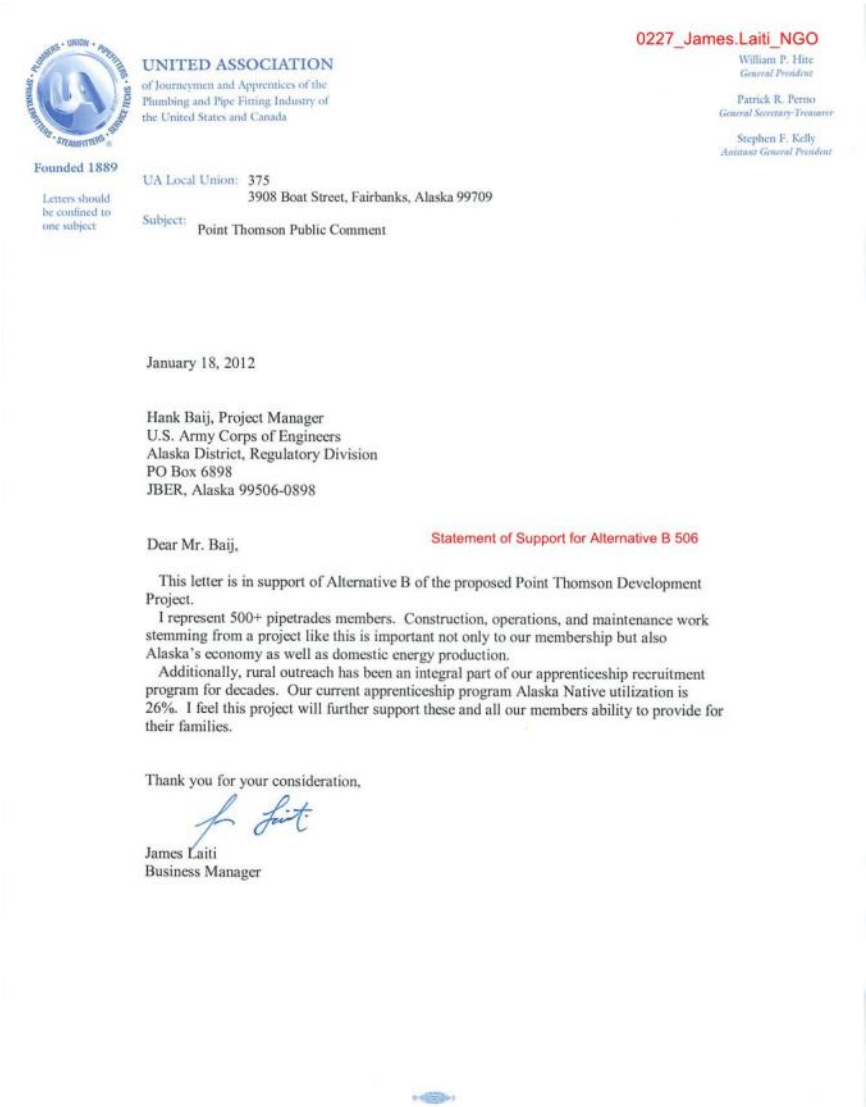	506 Comment noted; no action required.

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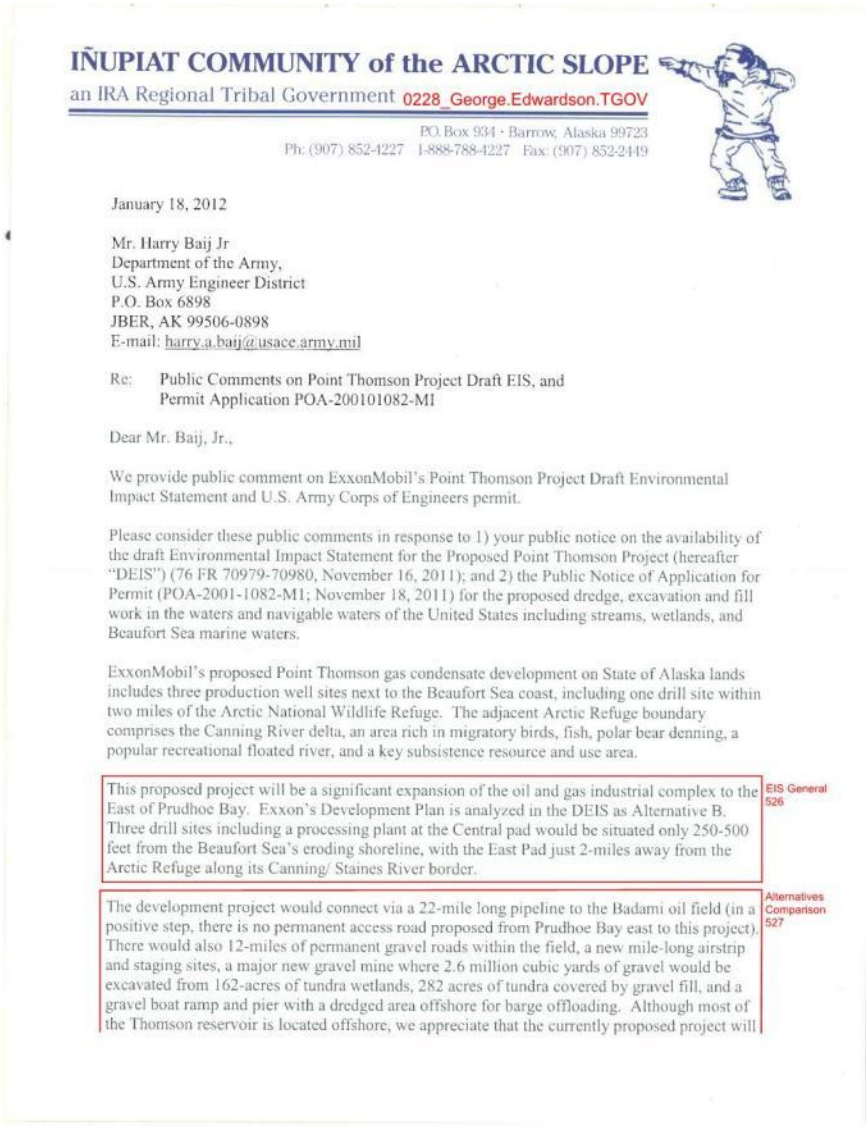	526 Comment noted; no action required. 527 Comment noted; no action required.

IÑUPIAT COMMUNITY of the ARCTIC SLOPE
an IRA Regional Tribal Government 0228_George.Edwardson.TGOV

P.O. Box 934 · Barrow, Alaska 99723
Ph: (907) 852-4227 1-888-788-4227 Fax: (907) 852-2449

January 18, 2012

Mr. Harry Baij Jr
Department of the Army,
U.S. Army Engineer District
P.O. Box 6898
JBER, AK 99506-0898
E-mail: harry.a.baij@usace.army.mil

Re: Public Comments on Point Thomson Project Draft EIS, and
Permit Application POA-200101082-MI

Dear Mr. Baij, Jr.,

We provide public comment on ExxonMobil's Point Thomson Project Draft Environmental Impact Statement and U.S. Army Corps of Engineers permit.

Please consider these public comments in response to 1) your public notice on the availability of the draft Environmental Impact Statement for the Proposed Point Thomson Project (hereafter "DEIS") (76 FR 70979-70980, November 16, 2011); and 2) the Public Notice of Application for Permit (POA-2001-1082-M1; November 18, 2011) for the proposed dredge, excavation and fill work in the waters and navigable waters of the United States including streams, wetlands, and Beaufort Sea marine waters.

ExxonMobil's proposed Point Thomson gas condensate development on State of Alaska lands includes three production well sites next to the Beaufort Sea coast, including one drill site within two miles of the Arctic National Wildlife Refuge. The adjacent Arctic Refuge boundary comprises the Canning River delta, an area rich in migratory birds, fish, polar bear denning, a popular recreational floated river, and a key subsistence resource and use area.

This proposed project will be a significant expansion of the oil and gas industrial complex to the East of Prudhoe Bay. Exxon's Development Plan is analyzed in the DEIS as Alternative B. Three drill sites including a processing plant at the Central pad would be situated only 250-500 feet from the Beaufort Sea's eroding shoreline, with the East Pad just 2-miles away from the Arctic Refuge along its Canning/ Staines River border.

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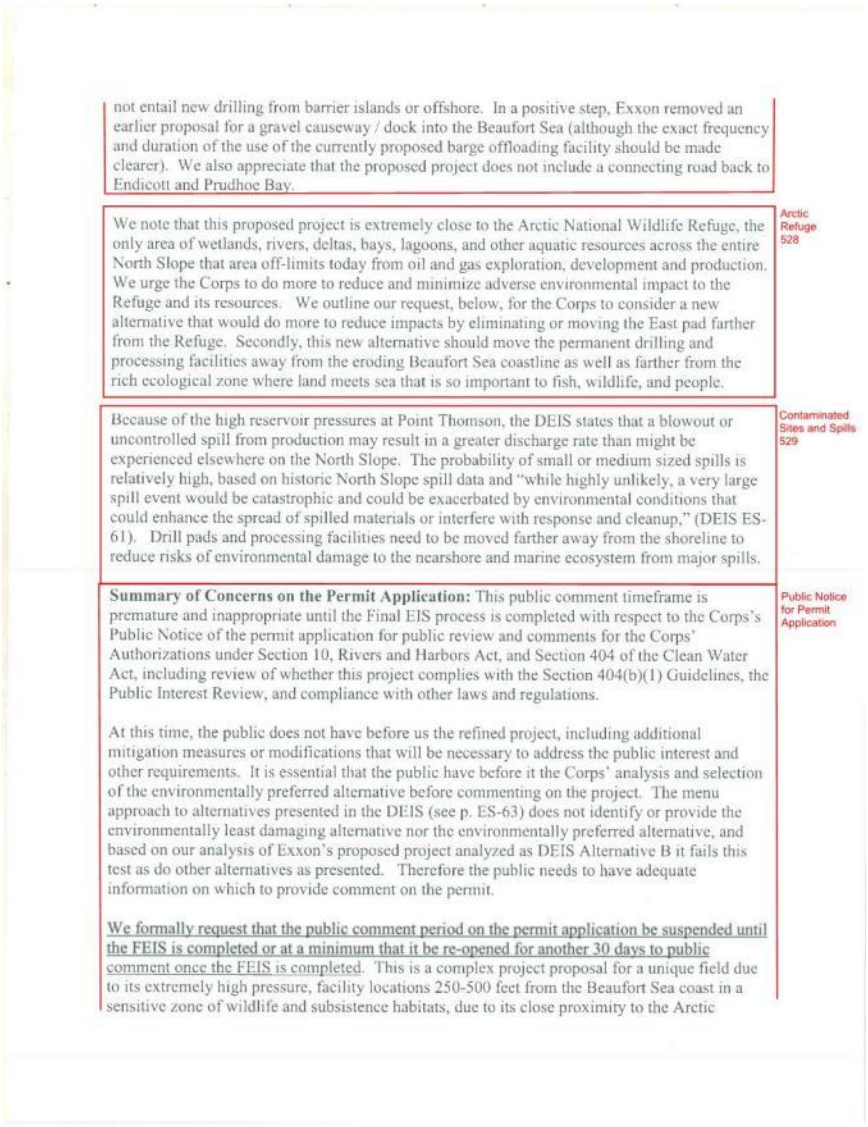
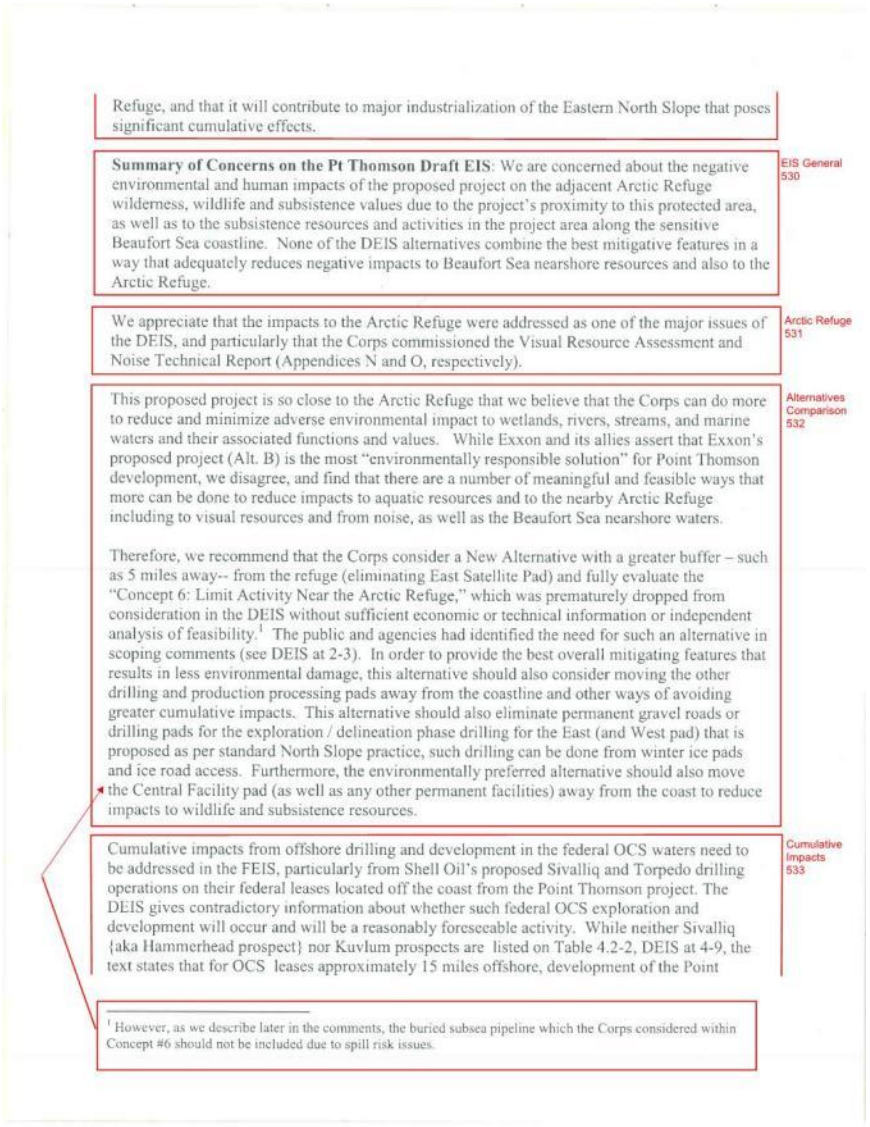
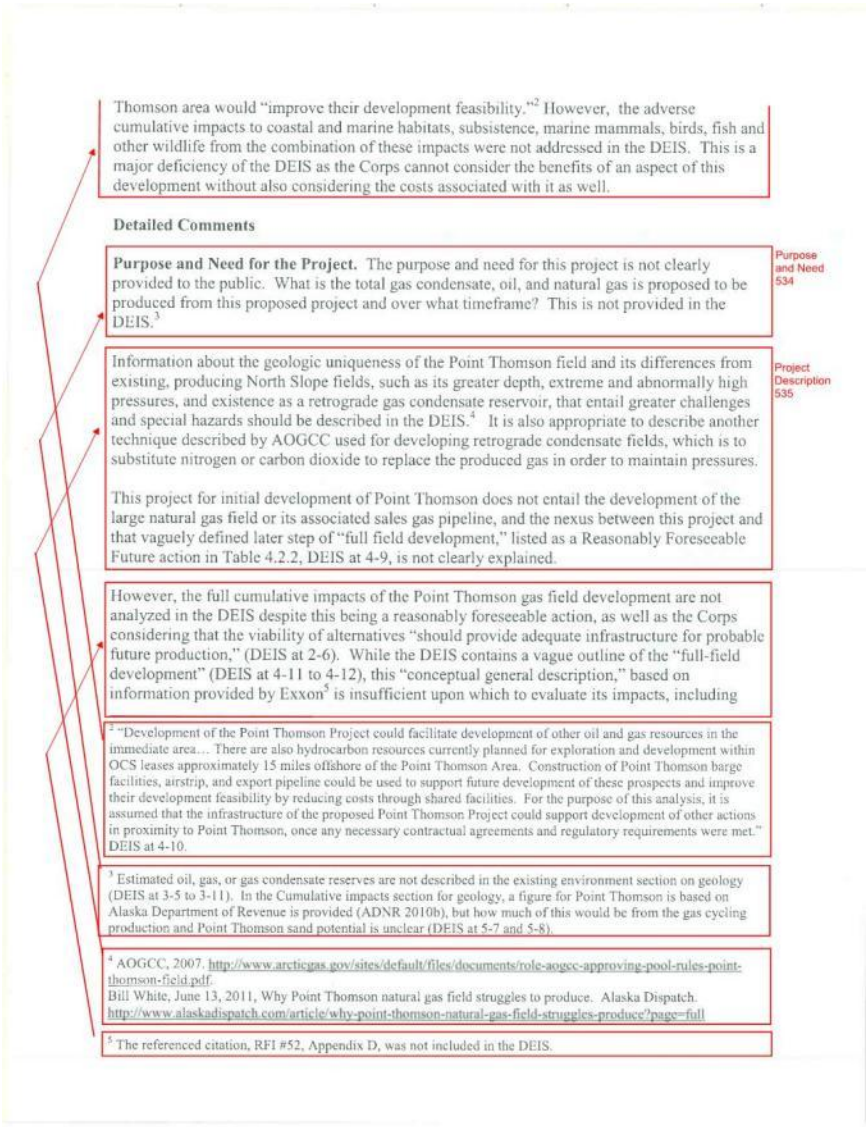
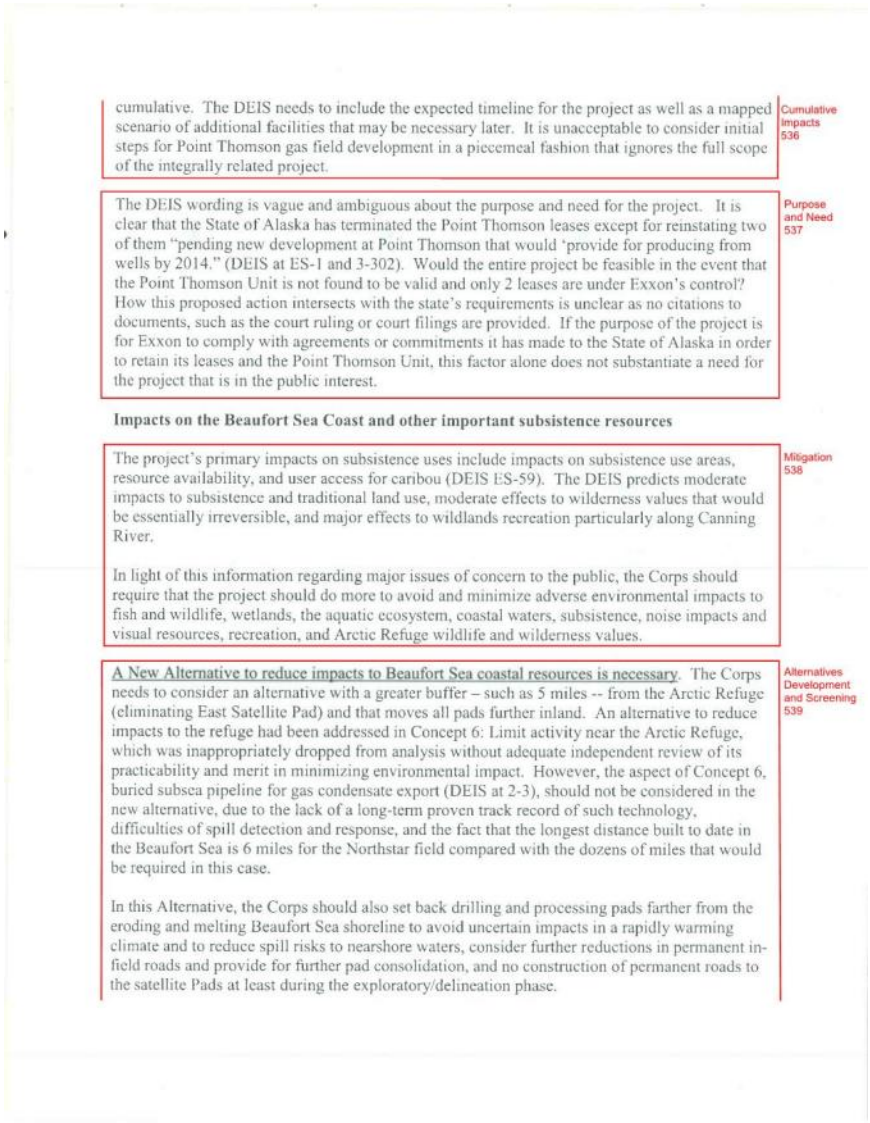
The development project would connect via a 22-mile long pipeline to the Badami oil field (in a positive step, there is no permanent access road proposed from Prudhoe Bay east to this project). There would also 12-miles of permanent gravel roads within the field, a new mile-long airstrip and staging sites, a major new gravel mine where 2.6 million cubic yards of gravel would be excavated from 162-acres of tundra wetlands, 282 acres of tundra covered by gravel fill, and a gravel boat ramp and pier with a dredged area offshore for barge offloading. Although most of the Thomson reservoir is located offshore, we appreciate that the currently proposed project will

Alternatives Comparison 527

Comment	Response
	528 The Arctic Refuge is a protected area; however, the area outside the refuge is state land, which is leased for the purpose of oil and gas development. Through the NEPA process, the public interest review, and the 404(b)(1) Guidelines analysis, the Corps will take many factors into consideration, including minimizing impacts, before making a final decision on the East Pad location. The Corps is not considering an alternative that does not include an East Pad. This alternative (Concept 6) was eliminated from detailed consideration for not meeting the purpose and need of the project. The language in Section 2.2.4.2, Concept 6: Limit Activity Near the Arctic Refuge, has been supplemented to make this decision clearer. Without the ability to drill wells from the vicinity of the proposed East Pad, the Applicant would not be able to access eastern resources that have already been identified in approximately one-third of the Thomson Sand Reservoir. A well from the Central Pad would have to reach more than 30,000 feet, which is technologically infeasible. Reduced access to the eastern portion of the reservoir would limit the Applicant's ability to continue evaluation and delineation activities, including fully delineating the eastern edge of the reservoir, testing connectivity with the central portion of the reservoir, and fully evaluating the Thomson Sand oil rim and Brookian Group sandstones hydrocarbons. The Applicant's Technical Brief #1 stated that a "Pad location further inland from the coast will increase the throw on all wells and potentially preclude the ability to reach portions of the reservoir necessary for full field development. This may lead to additional pads being needed in the future to reach bottomhole targets that cannot be reached from a pad that has been located further inland." In other words, a trade-off of moving pads inland would be the potential future need for additional pads closer to the reservoir (i.e., along the coast) in order to reach bottomhole targets, given the present 13,000-foot limit of extended-reach drilling. 529 A blowout would typically occur while drilling through the producing zones of the reservoir. For the two wells drilled in 2009-2010, seasonal restrictions were placed so that drilling could not occur during breakup or open water. The same restrictions would presumably be imposed on the proposed wells. Therefore, the location of the pads at the coast versus inland would not make a difference relative to impacts on the shoreline and marine waters. The difference in location could make a difference if a large to very large spill during production occurred during breakup or when the sea ice is absent. However, as stated in the EIS, the likelihood of such a spill is very low. Further, there are two wells already completed on the PTU-3 Pad that could not be moved. The Corps is taking these factors into consideration, along with other issues relevant to pad location, in assessing the alternatives to determine the environmentally preferred alternative.

Comment	Response
	530 The Corps will consider multiple factors, such as impacts identified during the NEPA process, the project purpose, practicability (as part of the 404[b][1] Guidelines analysis), public interest determination, and mitigation options, when making its final permit decision. 531 Comment noted; no action required. 532 The Arctic Refuge is a protected area; however, the area outside the refuge is state land, which is leased for the purpose of oil and gas development. Through the NEPA process, the public interest review, and the 404(b)(1) Guidelines analysis, the Corps will take many factors into consideration, including minimizing impacts, before making a final decision. See also responses to Comments 539 and 751. 533 The description of full field development is based on the best available information. Part of the Applicant's stated purpose for the proposed project is to further delineate the reservoir so that the Applicant can better understand, and thus define, a full field gas development project. Moreover, at this time, there is no gas pipeline to transport gas to market. Therefore, full field development is appropriately considered a reasonably foreseeable future action, as described in Section 4.2.3.3, Relevant Past, Present, and Reasonably Foreseeable Actions Considered in Cumulative Impacts Analysis.

Comment	Response
	534 Estimates of how much gas condensate, oil, or natural gas are not available for public release partly because the information is proprietary and partly because the intent of the proposed project is to further delineate and determine connectivity within the reservoir in order to estimate what quantities may be accessible for recovery. 535 The Corps believes that the Draft EIS sufficiently discussed the geologic uniqueness of the Point Thomson Reservoir. The Corps also does not see the need to describe the use of nitrogen or carbon dioxide to maintain pressure in the reservoir when the proposal is to cycle the natural gas back into the reservoir, not to extract it. The description of full field development is based on the best available information. Part of the Applicant's stated purpose for the proposed project is to further delineate the reservoir so that the Applicant can better understand, and thus define, a full field gas development project. Moreover, at this time, there is no gas pipeline to transport gas to market. Therefore, full field development is appropriately considered a reasonably foreseeable future action, as described in Section 4.2.3.3, Relevant Past, Present, and Reasonably Foreseeable Actions Considered in Cumulative Impacts Analysis.

Comment	Response
	536 The description of full field development is based on the best available information. Part of the Applicant's stated purpose for the proposed project is to further delineate the reservoir so that the Applicant can better understand, and thus define, a full field gas development project. Moreover, at this time, there is no gas pipeline to transport gas to market. Therefore, full field development is appropriately considered a reasonably foreseeable future action, as described in Section 4.2.3.3, Relevant Past, Present, and Reasonably Foreseeable Actions Considered in Cumulative Impacts Analysis. 537 The overall purpose of this project is to produce liquid hydrocarbons from the Thomson Sand Reservoir and further evaluate and delineate the reservoir and evaluate the Brookian Group sandstones. As far as this NEPA process and the Corps is concerned, the question at hand is whether or not to issue a permit allowing the filling of wetlands and other waters of the U.S. The Corps' requirements regarding permit application decisions does not require a permittee to hold title to the land (or by extension, have valid leases) for the Corps to make a decision to either approve or deny a permit. Conflicts between the Applicant and the State of Alaska concerning rights to the land, leases, or standing court proceedings are outside the scope of this environmental review and the jurisdiction of the Corps. 538 During the 404(b)(1) Guidelines analysis, the Corps will consider mitigation options along with impacts to the environment identified during the NEPA process before making its final permit decision. 539 The Corps will consider multiple factors, such as impacts to the environment identified during the NEPA process, the project purpose, practicability (as part of the 404[b][1] Guidelines analysis), public interest determination, and mitigation options, when making its final permit decision. The Corps has no jurisdiction and there is no precedence to impose a "buffer" on State land around the Arctic Refuge. Language has been added to Section 2.2.4.2 to help the reader understand why Concept 6 would not meet the purpose and need of the project and has therefore been eliminated from detailed consideration. The State of Alaska verified that a reach of more than 30,000 feet, which would be needed in order to access the eastern portion of the reservoir from the Central Pad, is technologically infeasible. Without the ability to drill wells from the vicinity of the proposed East Pad, that Applicant would not be able to access resources that have already been identified in approximately one-third of the Thomson Sand Reservoir. This conclusion is based on the general areal extent of the reservoir, which has been determined through delineation data gathered from the 16 exploration wells drilled since hydrocarbons were first discovered in the Point Thomson area in 1975 (Appendix D, RFI 63; Hartz et.al. 2008). Reduced access to the eastern portion of the reservoir would limit the Applicant's ability to continue evaluation and delineation activities, including fully delineating the eastern edge of the reservoir, testing connectivity with the central portion of the reservoir, and fully evaluating the Thomson Sand oil rim

Comment	Response
	and Brookian Group sandstones hydrocarbons. Finally, reduced access and the inability to delineate, evaluate, and ultimately recover hydrocarbons from the eastern portion of the reservoir would hamper the collection of data needed to develop a strategy for full field development. All season access to the East and West Pads is preferred by the Applicant because delineation would occur year-round. "Delineation" for the Point Thomson Project would consist of evaluating the connectivity of the reservoir. To determine connectivity, gathering lines would need to be built and cycling occur. Cycling could occur during non-ice road seasons, and therefore, other access to the East and West Pads would be needed. The coastal location of the pads presents a trade-off of impacts and the purpose of the project. The Applicant's Technical Brief #1 states that a "Pad location further inland from the coast will increase the throw on all wells and potentially preclude the ability to reach portions of the reservoir necessary for full field development. This may lead to additional pads being needed in the future to reach bottomhole targets that cannot be reached from a pad that has been located further inland." In other words, a trade-off of moving pads inland would be the potential future need for additional pads closer to the reservoir (i.e., along the coast) in order to reach bottomhole targets, given the present 13,000-foot limit of extended-reach drilling, which has been independently verified by the State of Alaska.

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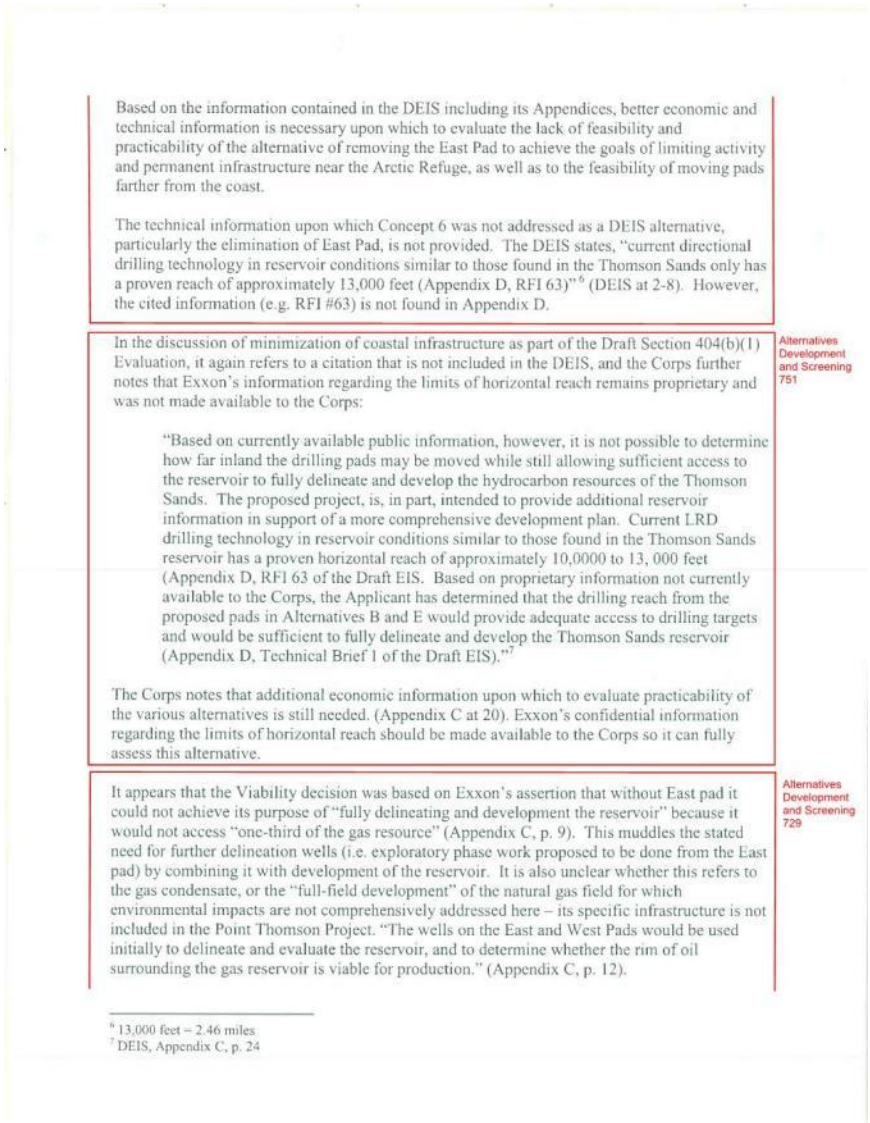	751 The State of Alaska verified that the horizontal reach limit of long reach directional drilling in high pressure and depth reservoirs such as the Thomson Sand Reservoir is approximately 13,000 feet. In addition, the Corps is continuing to request information about the long-reach directional drilling and project costs from the Applicant and will use this information as part of the 404(b)(1) Guidelines analysis and the final permit decision. 729 All season access to the East and West Pads is preferred by the Applicant because evaluation of reservoir connectivity would occur year-round after installation of the wells and would be part of the currently proposed project. The type of wells that are needed to evaluate the reservoir connectivity for the Point Thomson Project are not like traditional one season exploratory wells. The testing needed for commercial viability is long-term testing, which would be done during production of gas condensate. Production would occur year-round, and therefore the East (and West) Pad would need to be gravel with gathering lines connecting them to the central processing unit. Long-term testing during production would determine connectivity of the reservoir. Through this testing the applicant would be able to determine, with greater accuracy, the commercial and development potential of the reservoir.

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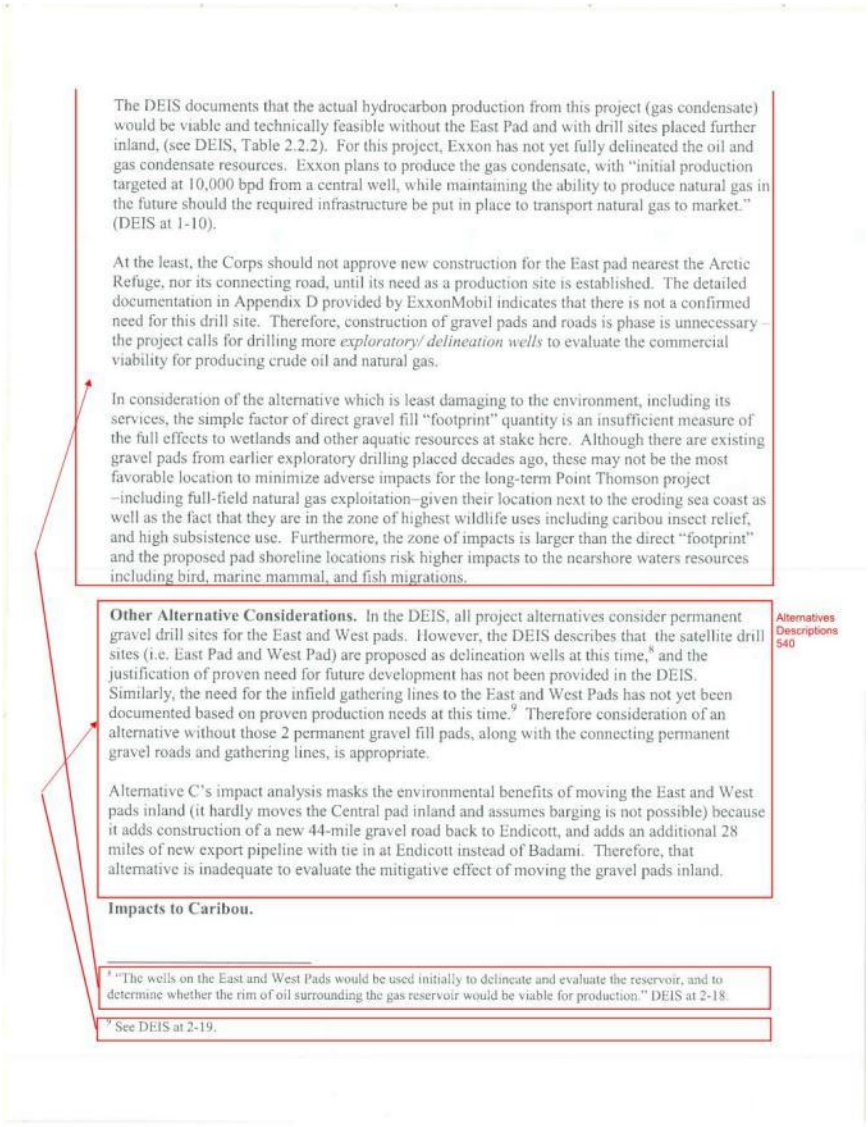	540 The Draft EIS referred to the wells as delineation wells, but in order to determine connectivity of the reservoir, these wells would need to be put into production. Production would occur year-round and therefore the East and West Pads would need to be gravel with gathering lines connecting them to the central processing unit. Long-term testing during production would determine connectivity of the reservoir. Through this testing the Applicant would be able to determine, with greater accuracy, the commercial and development potential of the reservoir.

The DEIS documents that the actual hydrocarbon production from this project (gas condensate) would be viable and technically feasible without the East Pad and with drill sites placed further inland, (see DEIS, Table 2.2.2). For this project, Exxon has not yet fully delineated the oil and gas condensate resources. Exxon plans to produce the gas condensate, with "initial production targeted at 10,000 bpd from a central well, while maintaining the ability to produce natural gas in the future should the required infrastructure be put in place to transport natural gas to market." (DEIS at 1-10).

At the least, the Corps should not approve new construction for the East pad nearest the Arctic Refuge, nor its connecting road, until its need as a production site is established. The detailed documentation in Appendix D provided by ExxonMobil indicates that there is not a confirmed need for this drill site. Therefore, construction of gravel pads and roads is phase is unnecessary – the project calls for drilling more *exploratory/ delineation wells* to evaluate the commercial viability for producing crude oil and natural gas.

In consideration of the alternative which is least damaging to the environment, including its services, the simple factor of direct gravel fill "footprint" quantity is an insufficient measure of the full effects to wetlands and other aquatic resources at stake here. Although there are existing gravel pads from earlier exploratory drilling placed decades ago, these may not be the most favorable location to minimize adverse impacts for the long-term Point Thomson project –including full-field natural gas exploitation–given their location next to the eroding sea coast as well as the fact that they are in the zone of highest wildlife uses including caribou insect relief, and high subsistence use. Furthermore, the zone of impacts is larger than the direct "footprint" and the proposed pad shoreline locations risk higher impacts to the nearshore waters resources including bird, marine mammal, and fish migrations.

Other Alternative Considerations. In the DEIS, all project alternatives consider permanent gravel drill sites for the East and West pads. However, the DEIS describes that the satellite drill sites (i.e. East Pad and West Pad) are proposed as delineation wells at this time,[8] and the justification of proven need for future development has not been provided in the DEIS. Similarly, the need for the infield gathering lines to the East and West Pads has not yet been documented based on proven production needs at this time.[9] Therefore consideration of an alternative without those 2 permanent gravel fill pads, along with the connecting permanent gravel roads and gathering lines, is appropriate.

Alternatives Descriptions 540

Alternative C's impact analysis masks the environmental benefits of moving the East and West pads inland (it hardly moves the Central pad inland and assumes barging is not possible) because it adds construction of a new 44-mile gravel road back to Endicott, and adds an additional 28 miles of new export pipeline with tie in at Endicott instead of Badami. Therefore, that alternative is inadequate to evaluate the mitigative effect of moving the gravel pads inland.

Impacts to Caribou.

[8] "The wells on the East and West Pads would be used initially to delineate and evaluate the reservoir, and to determine whether the rim of oil surrounding the gas reservoir would be viable for production." DEIS at 2-18.

[9] See DEIS at 2-19.

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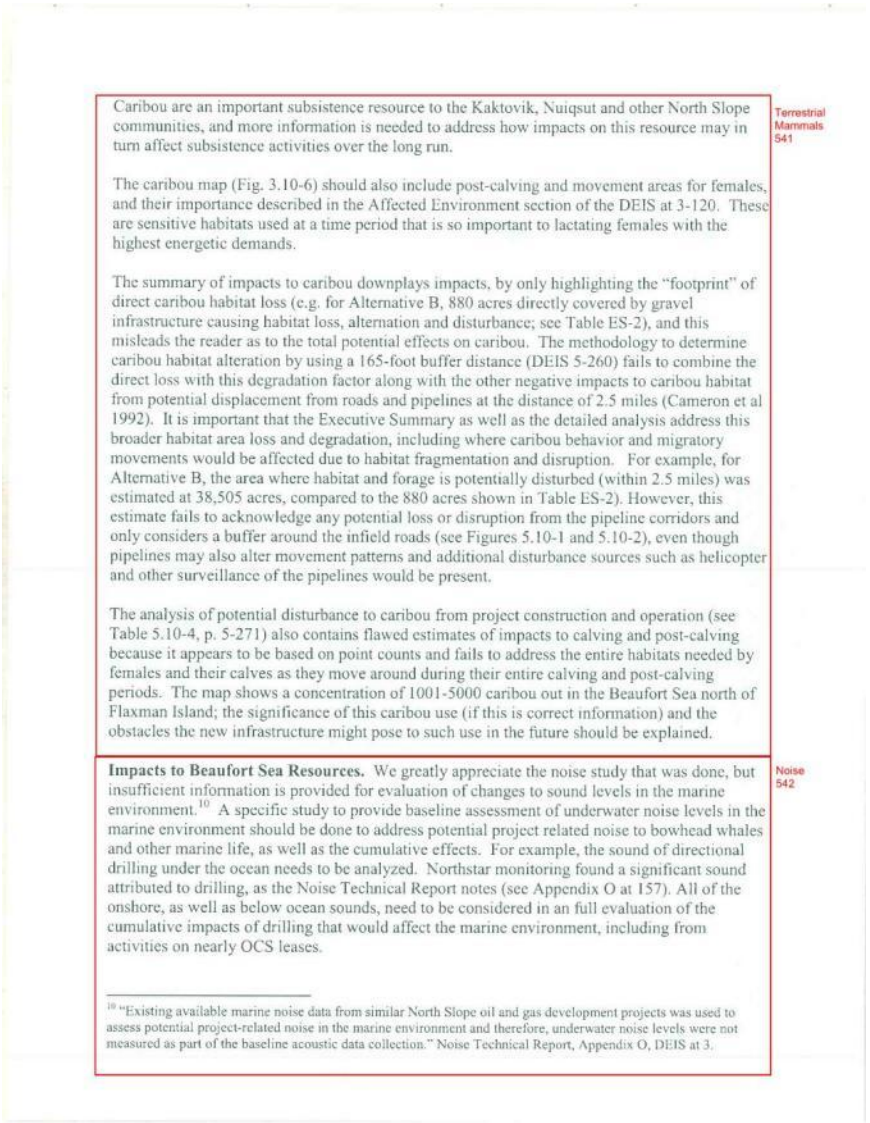
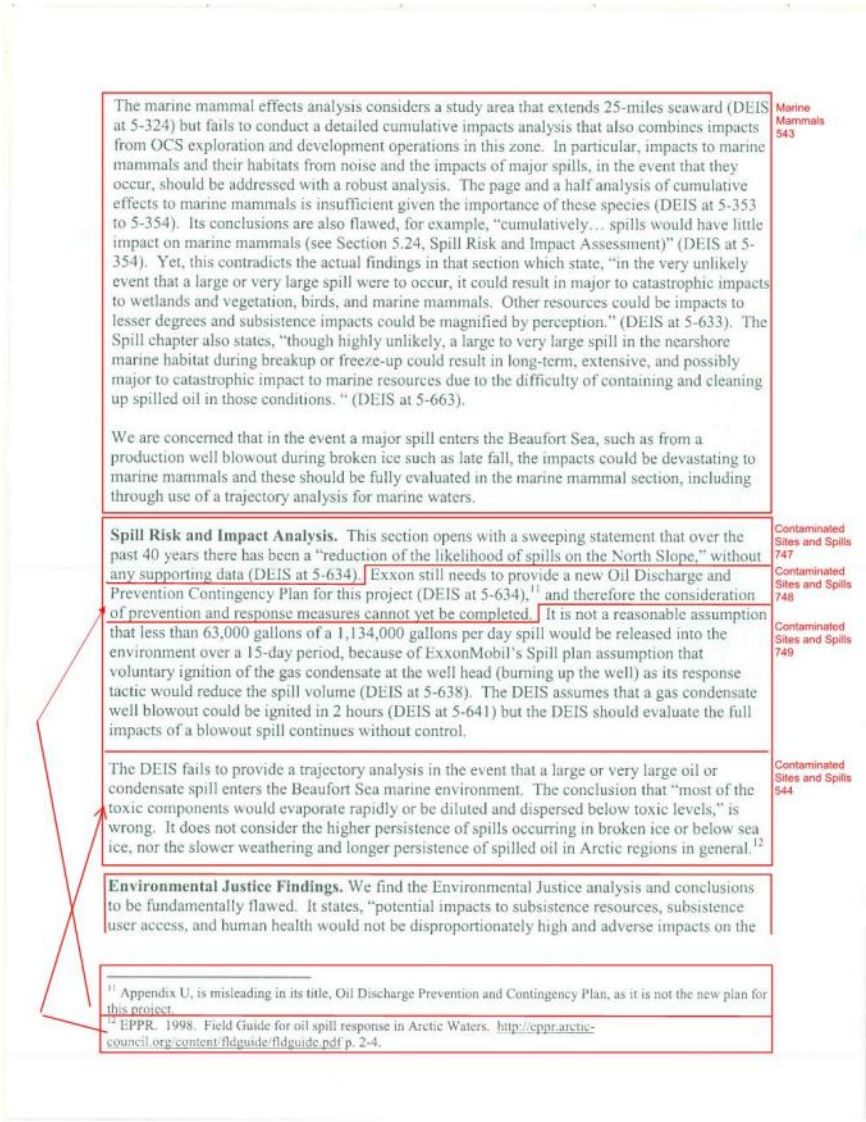
	541 The effects of the proposed project on Kaktovik and Nuiqsut subsistence activities are addressed in Section 5.22, Subsistence and Traditional Land-Use Patterns. The impact analysis for terrestrial mammals, caribou in particular, was used as part of the impact assessment for subsistence resources. Figures 3.10-8 and 3.10-9 identify caribou group size and location and movement density during the post-calving time period. Additionally, Figures 5.10-3, 5.10-6, 5.10-9 and 5.10-12 identify locations of Central Arctic Herd (CAH) caribou movement densities in June, July, and August. The Corps re-evaluated these figures and other available post-calving data and determined that the data presented in the Draft EIS are adequate for evaluating post-calving caribou movements. Data showing movement areas specifically for female caribou is inferred in Figures 3.10-8 and 3.10-9. A discussion of the importance of caribou post-calving areas has been added to Section 3.10.3.2, Caribou, of the Final EIS. Table 5.10-2 identifies direct habitat loss (footprint and buffer) and indirect habitat loss up to 2.5 miles away from available habitat and foraging areas that would potentially be disturbed. The buffer of 2.5 miles is broad enough to include behavioral response buffers that cover a range of possible disturbances including noise and visual. The buffers used are based on known displacement distances evaluated in multiple studies of caribou behavioral responses to disturbance (Dau and Cameron 1986; Cameron et al. 1992, 1995; Wolfe 2000; Noel et al. 2004; Haskell et al. 2006; Haskell and Ballard 2008). Potential impacts from pipeline corridors are discussed for each Alternative under Habitat Fragmentation. The Draft EIS notes that the pipeline heights (minimum of 7 feet) are greater than the minimum 5-foot height that has been recommended to prevent blockage of caribou movements during summer or winter (Cronin et al. 1994, Lawhead et al. 2006). Therefore, it is not expected that pipelines would alter movement patterns of caribou when they are not placed in close proximity to roads. Section 5.10 of the Final EIS was updated to note that aircraft could disturb caribou during routine maintenance and surveillance of pipelines. The analysis of potential disturbance to caribou from project construction and operation used ADF&G and other data made available to the Corps. The purpose of Table 5.10-4 is to identify the average number of caribou potentially occurring within 2.5 miles of Alternative B that could be disturbed and displaced. The intent of this table is not to identify important habitat for females and calves outside of the 2.5 miles. Impacts to habitat outside of the 2.5 mile buffer are not included in the analysis based on literature that has evaluated displacement distances in studies of caribou behavioral responses to disturbance (Dau and Cameron 1986; Cameron et al. 1992, 1995; Wolfe 2000; Noel et al. 2004; Haskell et al. 2006; Haskell and Ballard 2008). The photocensus data used to show caribou herd sizes was provided to the Corps by ADF&G. An explanation of the point location of 1,001 to 5,000 caribou north of Point Thomson (not north of Flaxman Island as suggested in this comment) was not provided by ADF&G and the Corps cannot speculate on the accuracy of

Comment	Response
	the location or the behavior of the caribou in the group. The potential for project infrastructure to affect the movements of caribou was analyzed by using the data showing the density of caribou movements shown on the same figures. 542 A review of published reports was conducted to determine the availability of baseline underwater ambient noise measurements for the nearshore waters of Point Thomson. While ambient noise data specifically for Point Thomson do not exist, various acoustic monitoring efforts off the North Slope were identified. As stated in Section 3.20.2 of the Draft EIS, Review and Adequacy of Information Sources for Noise, discussions with acousticians involved in acoustic monitoring in the Beaufort Sea confirmed that the best available data for shallow water ambient noise measurements near Point Thomson are associated with acoustic monitoring of industrial sounds for BPXA's Northstar development project. The Liberty development project was also considered to be a suitable candidate for comparison because, like Northstar and Point Thomson, Liberty occurs adjacent shallow waters (less than 66 feet in bottom depth). Point Thomson shares similar characteristics with Northstar and Liberty, specifically shallow water and topographical characteristics. The Corps determined that the available data from Northstar and Liberty were accurate, timely, and sufficiently similar to warrant direct comparison to the Point Thomson Project area and concluded that these data should be used for assessing the potential impacts of the Point Thomson Project on the marine soundscape. Drilling within the hydrocarbon zone at Point Thomson would occur during the winter months when most marine mammals are not in the area (see Sections 3.11 and 5.11, Marine Mammals, for details). Because the Point Thomson area is a shallow water environment with islands, sound transmission is limited. The Northstar EIS found that industrial sounds are unlikely to be detectable far enough offshore to be heard by spring-migrating whales, but if so the received levels would be weak and very unlikely to elicit behavioral reactions. Bowhead and Beluga whales would not be affected by drilling noises because of the topography of the area, and noise from vessels would still be the predominant anthropogenic noise in the environment. Aspects of noise impacts to marine mammals from the proposed project are discussed in both the marine mammal and noise sections of the EIS. Cumulative noise impacts were addressed by using the best available information regarding the type of activities anticipated for OCS exploration and development; specific data and types of activities that may occur simultaneously during OCS exploration and development are currently unknown and given the minor impacts of noise on marine mammals anticipated as a result of this project, the level of analysis is appropriate.

Comment	Response
	543 The Draft EIS cumulative impacts analysis for marine mammals does include an evaluation of OCS activities based on the past, present, and reasonably foreseeable future actions presented in Chapter 4. The marine mammals section does not evaluate the potential impacts of spills because spills impacts are addressed in Section 5.24, Spill Risk and Impact Assessment. As noted in the comment, the impact analysis in Section 5.24 does evaluate the impacts of a large or very large spill on marine mammals, stating that the impacts could be major to catastrophic, although very unlikely to occur. The Corps has determined that a trajectory analysis is not needed for this project because the likelihood of cumulative impacts associated with very large spills is extremely small (see Section 5.24.13.2, Cumulative Impacts). The conclusions in the marine mammal section of the cumulative impacts analysis quoted in the comment are not contradictory with the spills section, because the sentence is discussing impacts from non-oil and gas related activities and spills; the full sentence reads: "Cumulatively, non-oil and gas activities and spills would have little impact on marine mammals (see Section 5.24, Spill Risk and Impact Assessment)." Aspects of noise impacts to marine mammals from the proposed project are discussed in both the marine mammal and noise sections of the EIS. Cumulative noise impacts were addressed by using the best available information regarding the type of activities anticipated for OCS exploration and development; specific data and types of activities that may occur simultaneously during OCS exploration and development are currently unknown and given the minor impacts of noise on marine mammals anticipated as a result of this project, the level of analysis is appropriate. Assessing the potential risk of spills is the appropriate focus of the EIS, rather than analysis of worst-case impacts of a very unlikely event. The Applicant's amended ODPCP, required for the proposed project, would further address spill scenarios and mitigation and would be reviewed for consistency with 18 AAC 75 by the ADEC. 747 The statement at the beginning of Section 5.24, Spill Risk and Impact Assessment, "Over the past 40 years, the combination of stricter agency regulations, improving industry operating practices, and advancements in spill control technology have resulted in a reduction of the likelihood of spills on the North Slope," is a professional judgment based on the following: improved technology, including advances in the ability to use long-reach directional drilling to access offshore reservoirs from land-based facilities, better engineering design, greater stress on clean operations, and greater awareness of spill prevention, reporting and cleanup on the part of all the oil field personnel. We have modified this statement in the Final EIS (introduction to Chapter 5.24, Spill Risk and Impact Assessment) by adding "likely" before "resulted." See Section 3.24.3, Overview of North Slope Spill History, for a more detailed assessment of North Slope spill data.

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	748 The amended ODPCP that would be prepared for the proposed project, as required by 18 AAC 75.415, would be reviewed and approved, if deemed appropriate, by the ADEC. The Corps does not have the authority to determine the adequacy or suitability of the spill prevention and response measures for the Point Thomson Project. The approved ODPCP for the existing wells at the Point Thomson site was included in the EIS as background information for assessing potential impacts due to spills. However, an amended ODPCP is not required for the EIS. Section 5.24.1 explains that the ODPCP appended to the EIS is for the existing wells at the Point Thomson site and that this plan would need to be amended to cover the additional project components if the proposed project is approved. 749 The spill scenario presented in Section 5.24.2.3, Phases of Oil Field Development, is taken from the ODPCP for the existing wells at the Point Thomson site. The ODPCP was approved by the ADEC, and therefore, it is appropriate to use for assessing impacts in the EIS. 544 Weathering is described in Section 5.24.4.1, Weathering. As indicated in this section, weathering depends on environmental conditions. Weathering may be generally slower in the Arctic, but that does not mean these processes do not occur. The quoted text was taken from a discussion of impacts on marine water quality (Section 5.24.11.4, Water Quality) and is accurate. The EIS does consider Arctic conditions and, relative to sea ice, states in Section 5.24.5.2, Fresh or Marine Water: "Weathering processes in fresh or marine water are generally similar and mainly impacted by seasonal ice cover, which could greatly slow weathering in both systems (BLM 2004)." An aerial trajectory analysis for both oil and condensate well blowout events were included in the ODPCP (Appendix U) for the two wells drilled in 2009-2010. These wells are representative of the type of wells that would be drilled for the proposed project, and it is assumed that there would be similar seasonal drilling requirements to reduce the risk of a discharge to open water. The Applicant's amended ODPCP, required for the proposed project, would further address spill scenarios and mitigation and would be reviewed for consistency with 18 AAC 75 by the ADEC.

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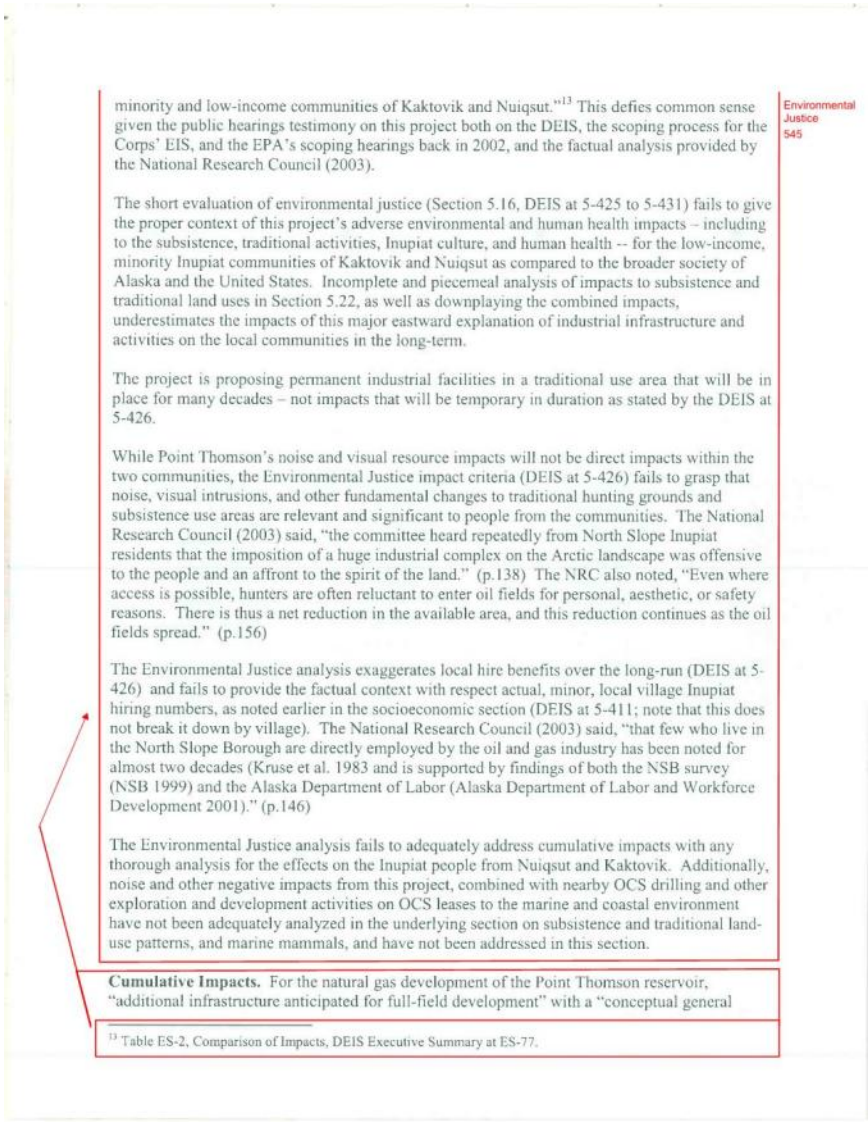	545 As discussed in Section 3.16, Environmental Justice, the Corps' evaluation of the potential for a disproportionately high and adverse effect on minority and low-income populations was based on the CEQ guidance on environmental justice under NEPA (Environment Justice: Guidance Under the National Environmental Policy Act. Referenced as CEQ 1997a in the Draft EIS). The findings of the environmental justice analysis incorporated the impact evaluations for subsistence and traditional land use, socioeconomics (including community cohesion and culture), and human health (Section 5.22, Section 5.15, and Section 5.23, respectively). The environmental justice analysis also included consideration of qualitative information gathered through the tribal consultation and public participation process. Impacts to these resources were thoroughly evaluated in the Draft EIS within each of the respective sections and findings were referenced and summarized within the context of environmental justice in Section 5.16. Based on the comment received, the Corps reevaluated the environmental justice section and its conclusions, and maintains that the impacts identified within the subsistence and traditional land use, socioeconomics, and human health sections, individually or additively, do not support a finding of a disproportionately high and adverse effect. This finding is consistent with the CEQ guidance on environmental justice on which the Corps' analysis was based (CEQ 1997a). See also the response to Comment 585 in Comment Document 231.

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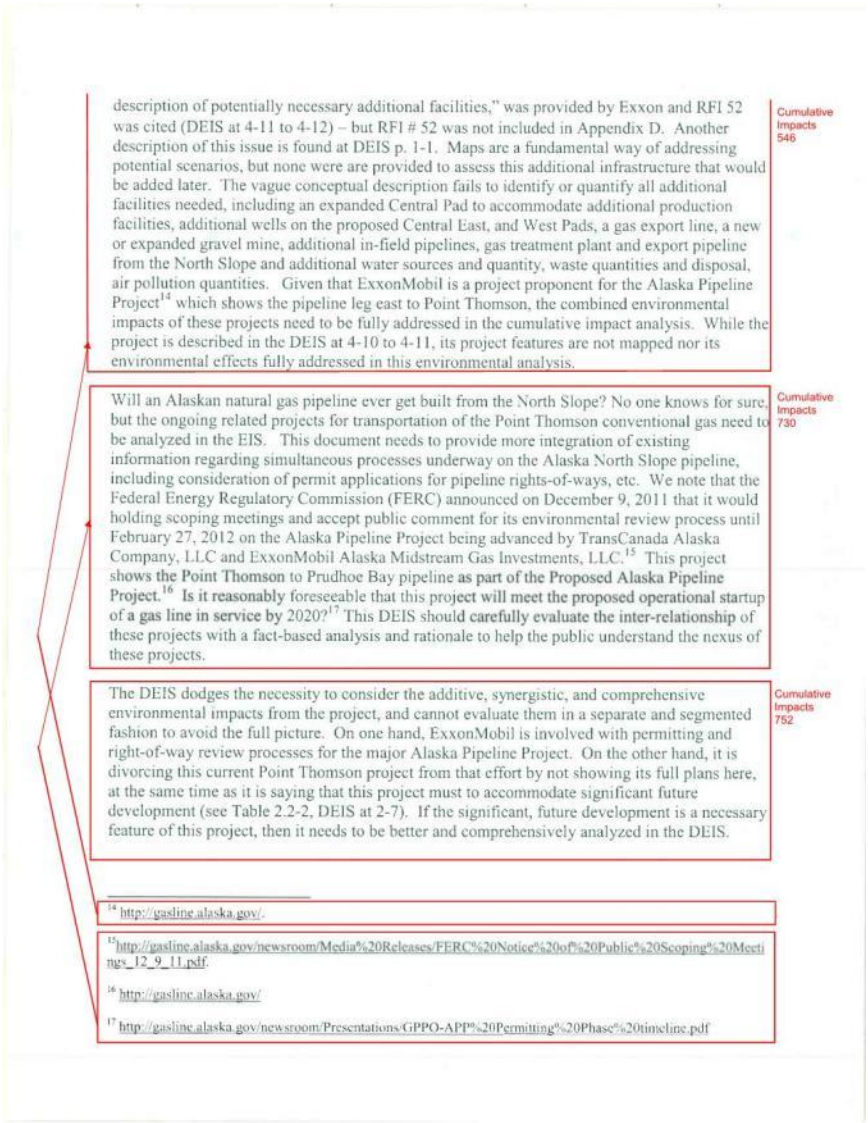	546 The description of full field development is based on the best available information. Part of the Applicant's stated purpose for the proposed project is to further delineate the reservoir so that the Applicant can better understand, and thus define, a full field gas development project. Maps at this stage would be speculative and would suggest a greater level of understanding of a future project that is not presently designed. 730 The Alaska Pipeline Project is included in the reasonably foreseeable future actions and the impacts are discussed within the cumulative impact sections. The Corps agrees that it is uncertain whether or when an export gas line would be built. It is still to be seen where the line would be located and by whom. Because of these unknowns, the discussion of the export gas line remains in the reasonably foreseeable future actions section of the EIS. The building of the gas line is a large undertaking that stands alone. The Point Thomson Project is proposed to extract condensate and oil. The proposed export pipeline would connect to TAPS. If a gas pipeline were to be built and resources from Point Thomson connected to it, then a gas line would have to be built from Point Thomson to tie in. A gas pipeline from Point Thomson to Deadhorse is shown as part of the Alaska Pipeline Project because ExxonMobil is a proponent of the project and therefore would want to connect Point Thomson to it. 752 The two projects (Point Thomson and the Alaska Pipeline Project) are separate. The Point Thomson Project is proposed to extract condensate and oil and the export pipeline proposed as part of the Point Thomson Project would connect to TAPS. A natural gas pipeline export from Point Thomson would only be constructed if a natural gas pipeline (such as the Alaska Pipeline Project) were to be built and the Point Thomson Project was expanded to include natural gas production.

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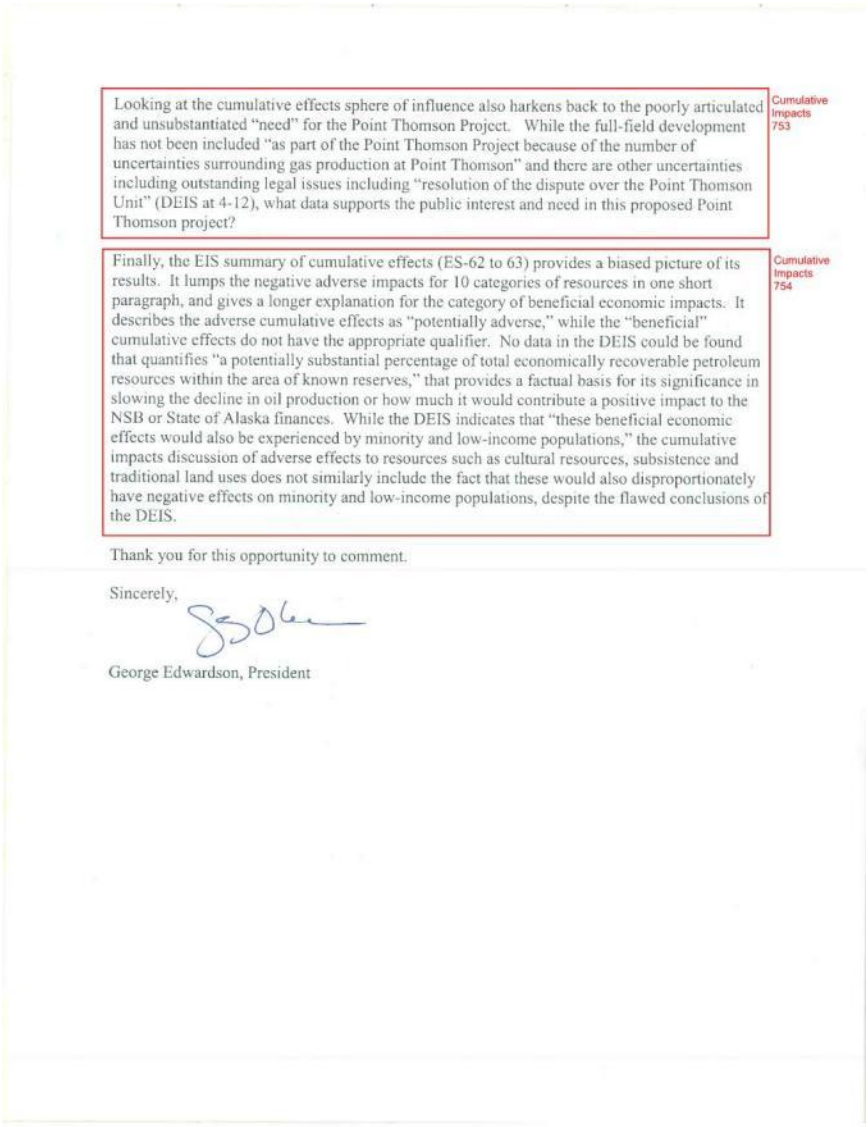	753 The overall purpose of this project is to produce liquid hydrocarbons from the Thomson Sand Reservoir and further evaluate and delineate the reservoir and evaluate the Brookian Group sandstones. The Corps' public interest determination will include the findings of the EIS, the 404(b)(1) Guidelines analysis, and consideration of all comments received on the Draft EIS and public notice of the permit application. 754 The Executive Summary section in question has been rewritten as follows: "Key Impacts/Issues • Potentially adverse cumulative effects were identified for coastal waters, hydrology, caribou, Arctic Refuge, environmental justice, visual aesthetics, cultural resources, and subsistence and traditional land use. • Potentially beneficial cumulative effects were identified to the economy."

Comment	Response
	507 Comment noted; no action required.

bp

Claire Fitzpatrick
Chief Financial Officer
Alaska Strategic Performance Unit

0229_Clair.Fitzpartick_Bus
BP Exploration (Alaska) Inc.
PO Box 196612
900 East Benson Boulevard
Anchorage, Alaska 99519-6612
Direct 907 564 5099
Main 907 564 5111
Fax 907 564 5699
Mobile 907 223 5654
fitzc3@bp.com

January 18, 2012

Mr. Harry Baij, Jr.
Department of the Army
U.S. Army Engineer District, Alaska
Regulatory Division
P.O. Box 6898
JBER, Alaska 99506-0898

Statement of Support for Project 507

RE: Comments on the Point Thomson Draft Environmental Impact Statement

Dear Mr. Baij:

BP Exploration (Alaska) Inc. (BPXA) is pleased to submit the following comments on the Point Thomson Draft Environmental Impact Statement (Draft EIS). As the largest operator on the North Slope and a 32% owner of the Point Thomson field, BPXA has a strong interest in the development of Point Thomson. Not only is development of the field significant to BPXA, it is also important to the State of Alaska and to all Alaskans. This resource contains an estimated 8 trillion cubic feet of gas and represents approximately 25 percent of known North Slope gas resources. Development of Point Thomson is critical to developing this resource and securing Alaska's energy future. Benefits for Alaskans include training and jobs; State revenue; business opportunities; and increased throughput for the Trans Alaska Pipeline.

BPXA is working closely with the other owners of the Point Thomson field as well as the State of Alaska, and we support responsible development of the field. We urge the Corps of Engineers to promptly issue a Final EIS along with requisite permits in order to facilitate timely development of this important project. Thank you for the opportunity to participate in the review process and for consideration of our comments.

Please contact me if you have any questions or concerns.

Sincerely,

Claire Fitzpatrick
Senior Vice President

Comment	Response

0230_R.Lee.Bruce_APP

P.O. Box 190267
Anchorage, Alaska 99519-0267
907 564 3668 Telephone
907 743 9809 Facsimile

R. Lee Bruce
Senior Project Manager
Point Thomson Project

ExxonMobil

January 18, 2012
ER-2012-OUT-003

Mr. Hank Baij, Jr., Project Manager
Department of the Army, U.S Army Corps of Engineers
Alaska Regulatory Division
Post Office Box 6898
JBER, Alaska 99506-0898

Re: ExxonMobil Comments – Point Thomson Project Draft Environmental Impact Statement

Dear Mr. Baij:

ExxonMobil appreciates the opportunity to provide comments on the Point Thomson Project DEIS. We commend the Corps, the EIS cooperating agencies and the third party EIS contractor HDR Alaska, Inc. on reaching this important milestone in the National Environmental Policy Act (NEPA) process review of the Point Thomson Project. We also appreciate the successful efforts in maintaining the current schedule during the previous 9 months which will lead to an ROD in August 2012 and start of construction this coming winter.

ExxonMobil believes that the DEIS is a sound and comprehensive document that fully complies with the requirements of NEPA and related Council on Environmental Quality and agency implementing regulations. Specifically, the DEIS provides a reasonable range of alternatives including components which could be interchanged among alternatives. The DEIS is supported by detailed analyses on a wide range of environmental, socioeconomic and technical issues including those raised during the EIS scoping process.

Evaluation of these alternatives in the DEIS provides credible and important information for the public on different approaches about how the project might be designed. These address concerns raised during scoping and facilitate review of whether environmental impacts might be reduced. The DEIS has been supported by various studies by HDR and ExxonMobil, including fieldwork such as wetlands, noise and visual aesthetics. Indeed these studies and EIS analyses are in many respects unprecedented in their scope and depth for an Alaska North Slope oil and gas development project.

Our enclosed comments suggest improvements that can be realized in the FEIS. These include distinguishing empirical impacts from theoretical effects and to separating those impacts which are unlikely to occur or are of negligible consequence. Related recommendations include revisions to impact criteria, methodology, and related analyses to better allow comparisons among the action alternatives. Such improvements would be helpful to public understanding of the environmental impacts of the Project and action alternatives. We believe these will enhance the credibility of the analysis and should not impede timely preparation of the Final EIS.

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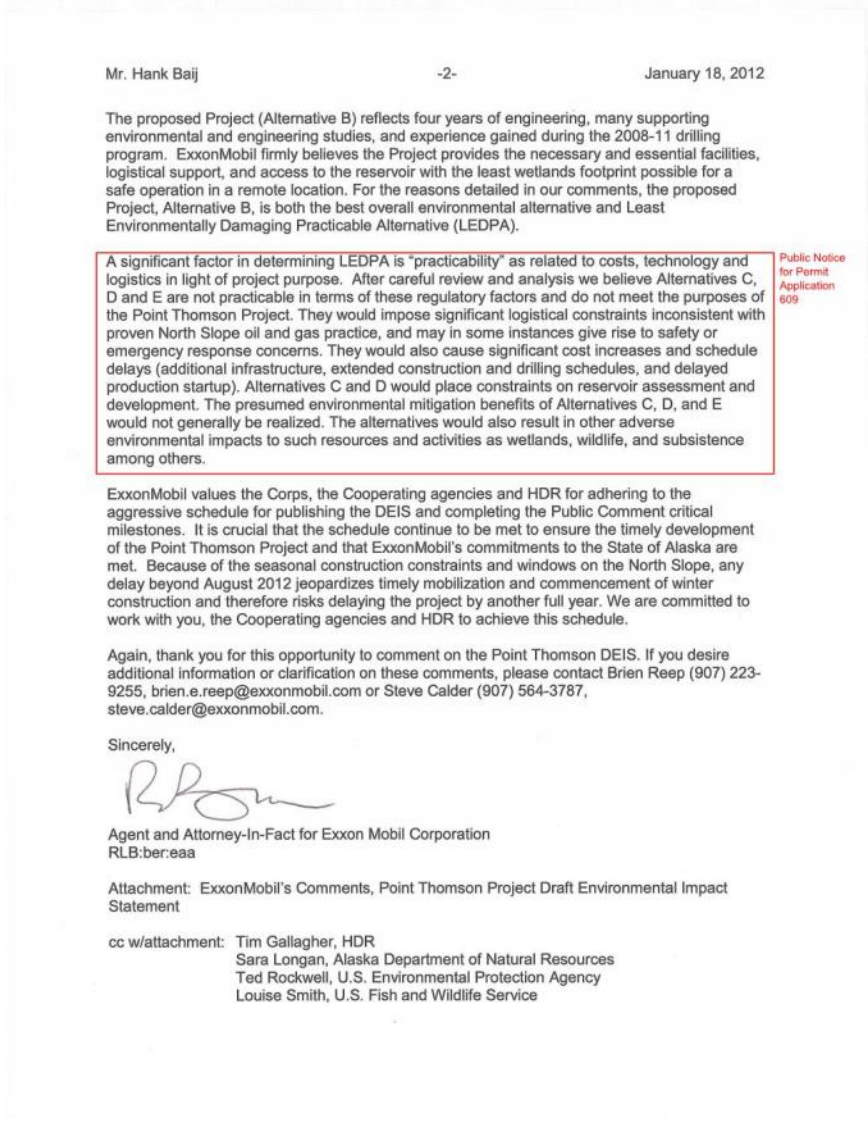	609 This comment is in response to the Corps' Public Notice of the permit application and will be responded to as part of the permitting process. No action required for the EIS.

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ExxonMobil POINT THOMSON PROJECT **ExxonMobil Comments** **Point Thomson Project** **Draft Environmental Impact Statement** **January 18, 2012**	Comment Document 230 continued.

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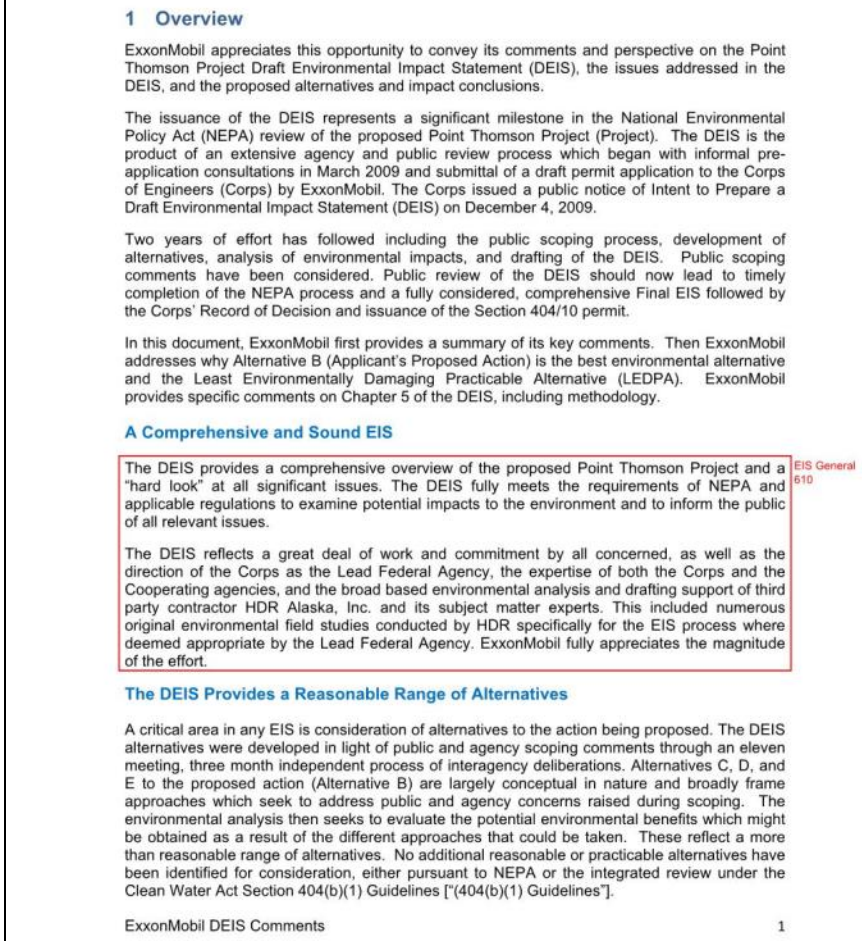	610 Comment noted; no action required.

1 Overview

ExxonMobil appreciates this opportunity to convey its comments and perspective on the Point Thomson Project Draft Environmental Impact Statement (DEIS), the issues addressed in the DEIS, and the proposed alternatives and impact conclusions.

The issuance of the DEIS represents a significant milestone in the National Environmental Policy Act (NEPA) review of the proposed Point Thomson Project (Project). The DEIS is the product of an extensive agency and public review process which began with informal pre-application consultations in March 2009 and submittal of a draft permit application to the Corps of Engineers (Corps) by ExxonMobil. The Corps issued a public notice of Intent to Prepare a Draft Environmental Impact Statement (DEIS) on December 4, 2009.

Two years of effort has followed including the public scoping process, development of alternatives, analysis of environmental impacts, and drafting of the DEIS. Public scoping comments have been considered. Public review of the DEIS should now lead to timely completion of the NEPA process and a fully considered, comprehensive Final EIS followed by the Corps' Record of Decision and issuance of the Section 404/10 permit.

In this document, ExxonMobil first provides a summary of its key comments. Then ExxonMobil addresses why Alternative B (Applicant's Proposed Action) is the best environmental alternative and the Least Environmentally Damaging Practicable Alternative (LEDPA). ExxonMobil provides specific comments on Chapter 5 of the DEIS, including methodology.

A Comprehensive and Sound EIS

The DEIS provides a comprehensive overview of the proposed Point Thomson Project and a "hard look" at all significant issues. The DEIS fully meets the requirements of NEPA and applicable regulations to examine potential impacts to the environment and to inform the public of all relevant issues. EIS General 610

The DEIS reflects a great deal of work and commitment by all concerned, as well as the direction of the Corps as the Lead Federal Agency, the expertise of both the Corps and the Cooperating agencies, and the broad based environmental analysis and drafting support of third party contractor HDR Alaska, Inc. and its subject matter experts. This included numerous original environmental field studies conducted by HDR specifically for the EIS process where deemed appropriate by the Lead Federal Agency. ExxonMobil fully appreciates the magnitude of the effort.

The DEIS Provides a Reasonable Range of Alternatives

A critical area in any EIS is consideration of alternatives to the action being proposed. The DEIS alternatives were developed in light of public and agency scoping comments through an eleven meeting, three month independent process of interagency deliberations. Alternatives C, D, and E to the proposed action (Alternative B) are largely conceptual in nature and broadly frame approaches which seek to address public and agency concerns raised during scoping. The environmental analysis then seeks to evaluate the potential environmental benefits which might be obtained as a result of the different approaches that could be taken. These reflect a more than reasonable range of alternatives. No additional reasonable or practicable alternatives have been identified for consideration, either pursuant to NEPA or the integrated review under the Clean Water Act Section 404(b)(1) Guidelines ["(404(b)(1) Guidelines"].

ExxonMobil DEIS Comments 1

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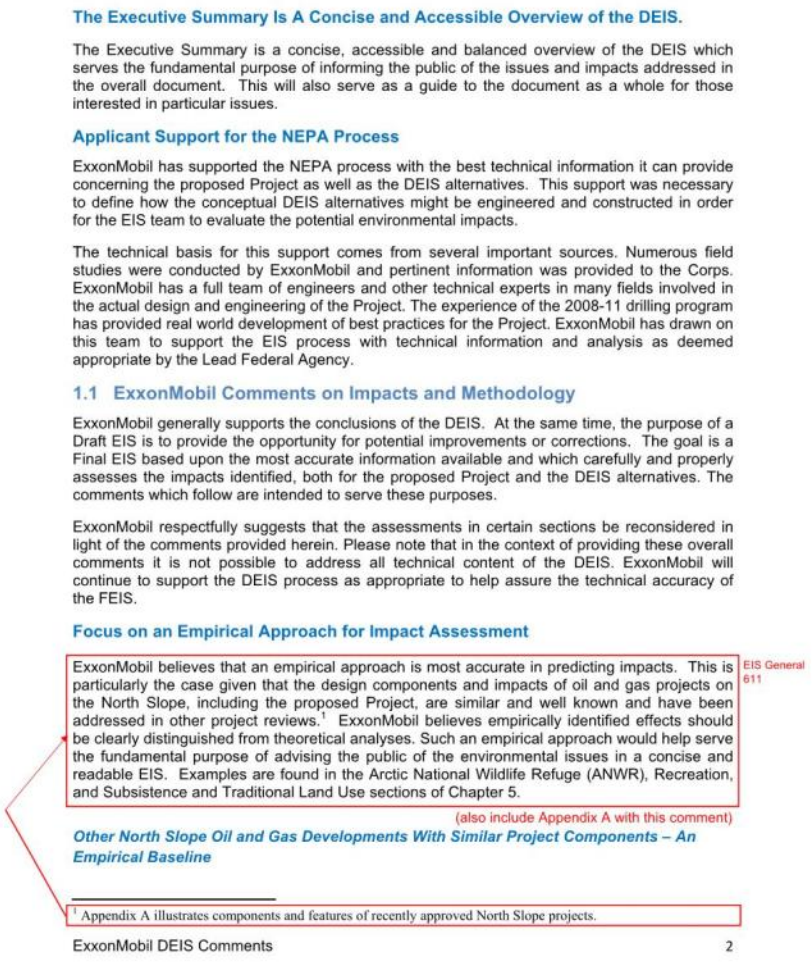	611 The Corps agrees that an empirical approach is best for determining and describing impacts within an EIS and that is why it is the approach used, when such empirical data were available, within this document. The resource-specific impact criteria definitions presented in Chapter 5 of the Final EIS are based on scientific literature and the best professional judgment of the Corps, cooperating agencies, and third-party EIS contractor subject matter experts. The definitions allow for analyses based on quantitative data, where available, and qualitative information and best professional judgment where quantitative data were unavailable.

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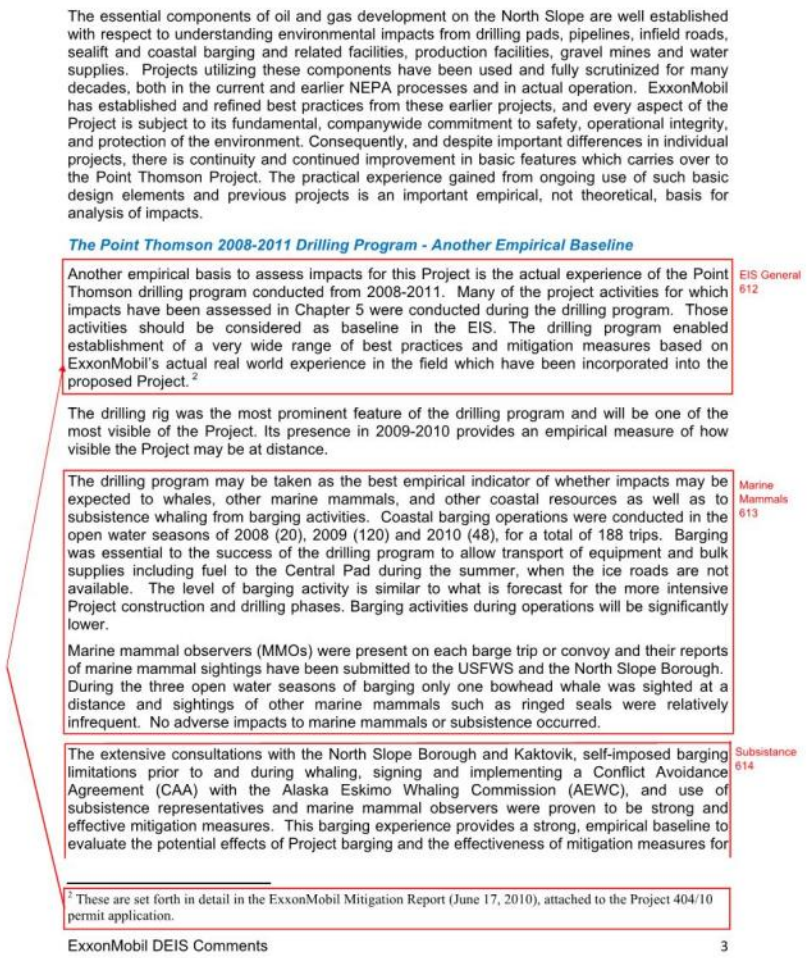	612 Comment noted; no action required. 613 Section 5.11.3.1, Alternative B: Construction, was revised in the Final EIS under the Vehicle and Vessel Collision Injury or Mortality subsection to include data regarding barge MMO observations from NSB marine mammal monitoring reports provided by the Applicant to the Corps. 614 Comment noted; no action required.

The essential components of oil and gas development on the North Slope are well established with respect to understanding environmental impacts from drilling pads, pipelines, infield roads, sealift and coastal barging and related facilities, production facilities, gravel mines and water supplies. Projects utilizing these components have been used and fully scrutinized for many decades, both in the current and earlier NEPA processes and in actual operation. ExxonMobil has established and refined best practices from these earlier projects, and every aspect of the Project is subject to its fundamental, companywide commitment to safety, operational integrity, and protection of the environment. Consequently, and despite important differences in individual projects, there is continuity and continued improvement in basic features which carries over to the Point Thomson Project. The practical experience gained from ongoing use of such basic design elements and previous projects is an important empirical, not theoretical, basis for analysis of impacts.

The Point Thomson 2008-2011 Drilling Program - Another Empirical Baseline

Another empirical basis to assess impacts for this Project is the actual experience of the Point Thomson drilling program conducted from 2008-2011. Many of the project activities for which impacts have been assessed in Chapter 5 were conducted during the drilling program. Those activities should be considered as baseline in the EIS. The drilling program enabled establishment of a very wide range of best practices and mitigation measures based on ExxonMobil's actual real world experience in the field which have been incorporated into the proposed Project.[2]

EIS General 612

The drilling rig was the most prominent feature of the drilling program and will be one of the most visible of the Project. Its presence in 2009-2010 provides an empirical measure of how visible the Project may be at distance.

The drilling program may be taken as the best empirical indicator of whether impacts may be expected to whales, other marine mammals, and other coastal resources as well as to subsistence whaling from barging activities. Coastal barging operations were conducted in the open water seasons of 2008 (20), 2009 (120) and 2010 (48), for a total of 188 trips. Barging was essential to the success of the drilling program to allow transport of equipment and bulk supplies including fuel to the Central Pad during the summer, when the ice roads are not available. The level of barging activity is similar to what is forecast for the more intensive Project construction and drilling phases. Barging activities during operations will be significantly lower.

Marine mammal observers (MMOs) were present on each barge trip or convoy and their reports of marine mammal sightings have been submitted to the USFWS and the North Slope Borough. During the three open water seasons of barging only one bowhead whale was sighted at a distance and sightings of other marine mammals such as ringed seals were relatively infrequent. No adverse impacts to marine mammals or subsistence occurred.

Marine Mammals 613

The extensive consultations with the North Slope Borough and Kaktovik, self-imposed barging limitations prior to and during whaling, signing and implementing a Conflict Avoidance Agreement (CAA) with the Alaska Eskimo Whaling Commission (AEWC), and use of subsistence representatives and marine mammal observers were proven to be strong and effective mitigation measures. This barging experience provides a strong, empirical baseline to evaluate the potential effects of Project barging and the effectiveness of mitigation measures for

Subsistance 614

[2] These are set forth in detail in the ExxonMobil Mitigation Report (June 17, 2010), attached to the Project 404/10 permit application.

ExxonMobil DEIS Comments 3

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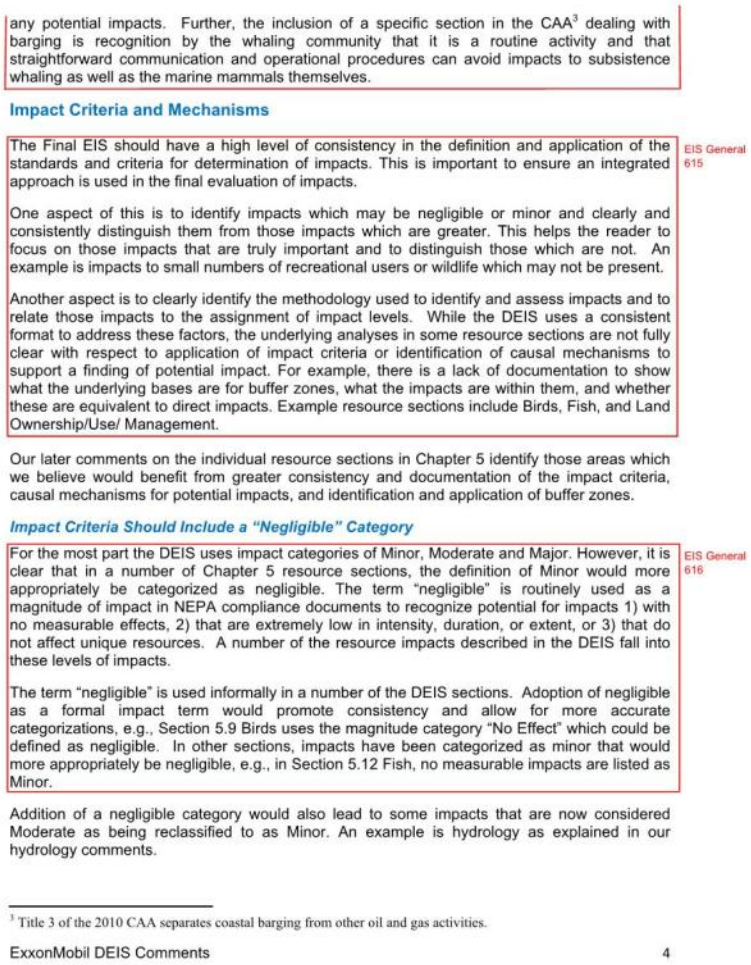	615 The Corps and cooperating agencies developed and agreed to the framework and general methodology for impact criteria (see Chapter 4), which provides a solid framework for analyzing impacts to the environment. The resource-specific impact criteria definitions presented in Chapter 5 were based on scientific literature and the best professional judgment of the Corps, cooperating agencies, and third-party EIS contractor subject matter experts. The definitions allow for analyses based on quantitative data, where available, and qualitative information and best professional judgment where quantitative data were unavailable. The methodology subsections within each resource section provide detail regarding assumptions used in determining impacts and buffer zones, including the literature referenced. To help the public and decision maker focus on the impacts of importance, each resource section includes multiple summaries of the relevant impacts. For example each section: begins with a table that summarizes the key impact findings and differentiators among alternatives; includes impact evaluation tables for each alternative or a summary table with all alternatives; and concludes with a comparison and consequences discussion of the alternative that summarizes the important issues regarding that resource, provides context for the impacts, and discusses potential consequences. 616 The Corps has considered the commenter's recommendation for improvements to the impact criteria and has made the decision not to incorporate the recommendations in the Final EIS. The Corps and cooperating agencies developed and agreed to the framework and general methodology for impact criteria (see Chapter 4), which provides a solid framework for analyzing impacts to the environment. The resource-specific impact criteria definitions presented in Chapter 5 are based on scientific literature and the best professional judgment of the Corps, cooperating agencies, and third-party EIS contractor subject matter experts. The definitions allow for analyses based on quantitative data, where available, and qualitative information and best professional judgment where quantitative data were unavailable. The Corps also believes that the impact categories of minor, moderate, and major are sufficient and will not be including a category of “negligible” in the Final EIS.

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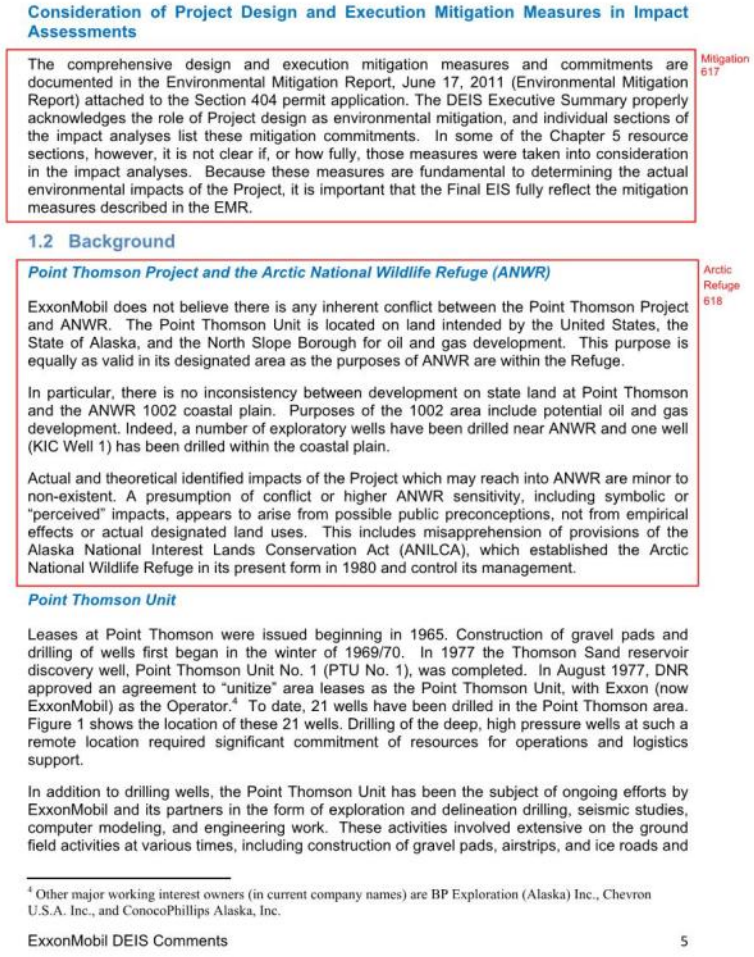
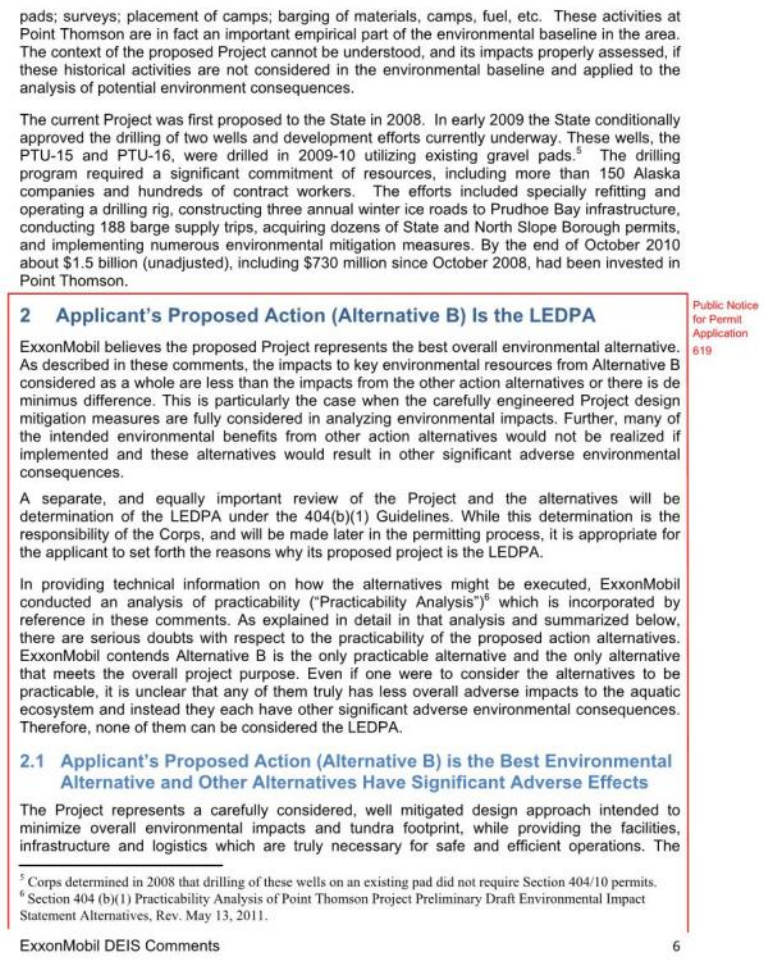
	617 Chapter 5 has been reviewed and edits made where deemed necessary to improve clarity that the design measures proposed by the Applicant in the Environmental Mitigation Report were taken into consideration when studying potential impacts. 618 The EIS indicates that the proposed development of Point Thomson would be on state land managed for oil and gas development. It is the purpose of the EIS to disclose impacts of the proposed development. The EIS reflects the intent of the State and the Applicant to develop these lands, and it reflects the impacts that would occur. The occurrence of impacts is not meant to imply that the development cannot proceed or that the management intent for such development is not valid.

Comment	Response
	619 This comment is in response to the Corps' Public Notice of the permit application and will be responded to as part of the permitting process. No action required for the EIS.

pads; surveys; placement of camps; barging of materials, camps, fuel, etc. These activities at Point Thomson are in fact an important empirical part of the environmental baseline in the area. The context of the proposed Project cannot be understood, and its impacts properly assessed, if these historical activities are not considered in the environmental baseline and applied to the analysis of potential environment consequences.

The current Project was first proposed to the State in 2008. In early 2009 the State conditionally approved the drilling of two wells and development efforts currently underway. These wells, the PTU-15 and PTU-16, were drilled in 2009-10 utilizing existing gravel pads.[5] The drilling program required a significant commitment of resources, including more than 150 Alaska companies and hundreds of contract workers. The efforts included specially refitting and operating a drilling rig, constructing three annual winter ice roads to Prudhoe Bay infrastructure, conducting 188 barge supply trips, acquiring dozens of State and North Slope Borough permits, and implementing numerous environmental mitigation measures. By the end of October 2010 about $1.5 billion (unadjusted), including $730 million since October 2008, had been invested in Point Thomson.

2 Applicant's Proposed Action (Alternative B) Is the LEDPA

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ExxonMobil believes the proposed Project represents the best overall environmental alternative. As described in these comments, the impacts to key environmental resources from Alternative B considered as a whole are less than the impacts from the other action alternatives or there is de minimus difference. This is particularly the case when the carefully engineered Project design mitigation measures are fully considered in analyzing environmental impacts. Further, many of the intended environmental benefits from other action alternatives would not be realized if implemented and these alternatives would result in other significant adverse environmental consequences.

A separate, and equally important review of the Project and the alternatives will be determination of the LEDPA under the 404(b)(1) Guidelines. While this determination is the responsibility of the Corps, and will be made later in the permitting process, it is appropriate for the applicant to set forth the reasons why its proposed project is the LEDPA.

In providing technical information on how the alternatives might be executed, ExxonMobil conducted an analysis of practicability ("Practicability Analysis")[6] which is incorporated by reference in these comments. As explained in detail in that analysis and summarized below, there are serious doubts with respect to the practicability of the proposed action alternatives. ExxonMobil contends Alternative B is the only practicable alternative and the only alternative that meets the overall project purpose. Even if one were to consider the alternatives to be practicable, it is unclear that any of them truly has less overall adverse impacts to the aquatic ecosystem and instead they each have other significant adverse environmental consequences. Therefore, none of them can be considered the LEDPA.

2.1 Applicant's Proposed Action (Alternative B) is the Best Environmental Alternative and Other Alternatives Have Significant Adverse Effects

The Project represents a carefully considered, well mitigated design approach intended to minimize overall environmental impacts and tundra footprint, while providing the facilities, infrastructure and logistics which are truly necessary for safe and efficient operations. The

[5] Corps determined in 2008 that drilling of these wells on an existing pad did not require Section 404/10 permits.
[6] Section 404 (b)(1) Practicability Analysis of Point Thomson Project Preliminary Draft Environmental Impact Statement Alternatives, Rev. May 13, 2011.

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Environmental Mitigation Report provides a comprehensive summary of the mitigation measures that will successfully reduce environmental impacts. As explained in these comments, if implemented all, of the action alternatives would cause other significant adverse environmental consequences. Thus, Alternative B results in the least overall environmental impacts of the four action alternatives. The following list key advantages of Alternative B and other adverse consequences of Alternatives C, D, and E. • Alternative B was designed with potential full field development scenarios (e.g. expanded gas cycling, gas sales) in mind to reduce overall environmental impacts during the life of the Project. Specifically, Alternative B's coastal pad locations are necessary to ensure full access to the offshore portions of the reservoir and thus assures that no additional drilling pads would be required. The inland locations for East and West Pads in Alternatives C and D limit ability to access the reservoir. This creates the risk that additional pads will be required in the future thereby potentially eliminating a portion of the perceived benefits. • Alternative B's logistics strategy reduces impacts on resources such as wetlands footprint, polar bears, and fresh water. The logistics strategy also allows the Project to have the shortest construction and drilling phases of all the action alternatives, which reduces the duration of related impact categories such as noise, visual, and air emissions. • Alternative C would duplicate major pipeline infrastructure and create a 2nd pipeline right-of-way corridor in the area between Badami and Prudhoe Bay. • Alternatives C and D both require substantially larger gravel footprints due to their longer infield roads (and access road for Alternative C) and the inefficiency in footprint that results from separating the Central Pad in Alternative B into two separate pads. • Alternatives C and D increase impacts to wetlands, and terrestrial and marine mammals. • Alternatives C and D would cause additional impacts associated with the 2.5 miles of high pressure pipelines between the two pads. • The location of proposed pads in Alternative B avoids the potential need to construct additional drill pads for reasonably foreseeable future development. • Alternatives C, D, and E would create additional noise impacts, visual impacts, air quality impacts and fresh water impacts during construction and drilling due to their extended construction and drilling schedules. • Reliance on annual ice roads in Alternative D as the primary means of construction and operational re-supply require larger gravel pad footprints to provide sufficient space for storage between ice road seasons. • Annual ice roads required during operations for Alternatives D and E increase fresh water needs and potential impacts to polar bears for the life of the Project vs. Alternative B. • Lack of infield gravel roads in Alternative E requires additional storage space on the Central Pad for supplies transported by barge but not able to be moved to the East or West Pads until ice roads are established the following winter season. Additional space will likely also be needed at the East and Wet Pads. • Alternative E would create other significant environmental consequences as a result of eliminating infield gravel roads including noise, visual and air emissions impacts due to ExxonMobil DEIS Comments 7	

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use of helicopters for accessing East and West Pads for about nine months each year. Another significant adverse consequence is the reduced capability to respond to oil spills or other emergency events when ice roads would not be available. • DEIS Sections 2.4.4 and 2.4.5 states that Alternatives C and D were: "intended to minimize impacts to coastal resources such as marine mammals, marine fish, subsistence activities, coastal processes, and to avoid potential impacts to the proposed project from coastal erosion." As discussed further in comments on resource sections below, the specific impact mechanisms to these resources from coastal facilities and activities which would demonstrate an environmental benefit to moving inland are not identified. For most coastal resources, there is very little that differentiates the action alternatives. • Alternatives C and D for example do not demonstrate any benefit to coastal based subsistence activities. These activities are relatively infrequent in the Point Thomson area and account for a very small portion of Kaktovik's subsistence harvest. The limited coastal frontage of the project's facilities, pipeline setback and design, and ExxonMobil's commitment to work with Kaktovik to continue subsistence access to the Project area (in a plan to be agreed with residents) should mitigate subsistence related issues due to the presence of the Project. **2.2 The Applicant's Proposed Action (Alternative B) is the Only Practicable Alternative** As noted above, ExxonMobil believes that Alternative B has the least overall environmental impacts and should therefore be considered the least environmentally damaging alternative. An additional indispensable consideration under the 404(b)(1) Guidelines is the practicability of alternatives with respect to the Project's overall purpose. This evaluation focuses on logistics, cost, and technology (as well as health and safety considerations).. ExxonMobil respectfully submits that the Applicant's proposed action is the only alternative which meets the 404(b)(1) practicability standards related to logistics, technology, and costs and the Applicant's Purpose and Need and is therefore the LEDPA. • Alternative B provides the best year round access for safe operations and emergency response. Under Alternative E, an emergency shelter for personnel safety at East and West Pads would be required at a safe distance from the wells for workers that may be stranded due to weather, which would require an increase in footprint. In addition, provisions would have to be made in Alternative E for emergency evacuation of workers from the pads in the event of a serious well control emergency or blow-out during the nine months of each year in which ice roads are not available. This includes emergencies such as heart attack or serious injury. • Alternative B is the most logistically efficient of the all the action alternatives using all available forms of transportation: ice roads, aviation, and barging. Logistics is one of the important parameters to be considered under a LEDPA analysis and, in the case of Point Thomson, impacts to logistical efficiency also translate into impacts on cost and schedule and ability to achieve the Applicant's Purpose and Need. • There are significant technology issues related to the safe and timely transport of large modules on a 50-mile ice road as required by Alternatives C and D. This length of module transport via ice road has never been attempted on the North Slope, and increases risks to timely project execution. ExxonMobil DEIS Comments 8	

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• Access to bottom hole targets is essential for the current Project and potential future development options (See section 2.4 below). The Alternative B pad locations provide as much coverage of the field as possible within the 13,000 ft. Long Reach Directional Drilling (LRDD) technical limit. • Use of larger sealift modules planned for Alternative B reduce gravel pad footprint by consolidating the facilities and minimizing the area required for heavy construction equipment and material storage. The number of module interconnections, associated hydro-testing, etc. is reduced by testing and commissioning the piping systems in the fabrication yard to a greater extent. • Alternatives C and D by contrast require more onsite personnel and time to install, hook up, and commission the larger number of smaller modules (32 modules vs. 11 in Alternative B). This increase in modules and onsite labor requirements translate into greater space needs for accommodations and related support infrastructure, increasing pad size requirements and footprint. • Alternatives C, D, and E cause significant increases in Project costs. ExxonMobil has provided the Corps with comparative incremental cost information to demonstrate that the action alternatives from a cost comparison alone are not practicable (Practicability Analysis). • Alternative B meets the Applicant's Purpose and Need including the commitment to the State to initiate production by the winter season 2015-16. Alternatives C, D, and E fall short on the need to initiate production and to provide for future full development of the field. **2.3 Remote Coastal Project Site Dictates Logistics and Practicability** The location of the Project is on the central North Slope coast, 50 to 60 miles east of Prudhoe Bay and 22 miles east of the Badami oil field. The location of the Project on the coast is fixed by the Thomson Sand reservoir which straddles the coast and is predominately offshore. This is a remote area unconnected to the existing, road accessible infrastructure on the North Slope. This greatly impacts Project design and logistics strategy, and requires management of special health and safety considerations. The coastal location allows for efficient access by barge, which is a key component of the logistics strategy. **2.3.1 All Modes of Transportation are Essential** This section demonstrates why it is essential that every available mode of transportation be available to execute the Project efficiently and in a safe manner. Challenging and expensive logistics are required to transport and support personnel, materials, equipment and production modules to the remote site with limited seasonal work and supply windows, and logistics is the principal consideration driving schedule and cost. Logistics also drive potential impacts to personnel safety, health, emergency response and the environment including wetlands impact and limited structures in marine waters. A fundamental reality is that the elimination of one mode of transportation results in increased use of other modes of transportation in the same or different seasons. For example a coastal barge operating in summer can carry the equivalent of ten truck loads. If that cargo is ultimately carried by truck, it would have to be transported in winter via ice road, and additional pad ExxonMobil DEIS Comments 9	

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storage space may be required due to limited opportunities for resupply. These shifts in logistical configurations also result in environmental tradeoffs described above and in Appendix C to the Practicability Analysis. Helicopters provide the only year-round mode of access until a gravel airstrip is constructed. Winter ice roads, summer barging, and early winter tundra travel are the other means to access the site and they are only available during limited seasonal windows. These windows are brief (2 - 3 months of summer barging and 3 months of winter ice road travel, 1 – 2 months of early winter tundra travel), and access during these periods is often uncertain due to variations in weather, ice conditions, wildlife interactions and other circumstances. The experience of the 2008-2011 drilling program showed weather-related helicopter downtime occurs about 20% of the time and field work undertaken to support the EIS has shown that summer fog can shut down helicopter flights for several days or more at a time. Phase 3 white-out winter conditions can shut down both air and land transportation for several days at a time **2.3.2 Action Alternatives C, D, and E Severely Constrain Logistics and Create Emergency Response and Safety Concerns** A project with material, supply and facility requirements equivalent to the Point Thomson Project undertaken in the Prudhoe area would require careful execution planning. Executing this development at the remote Point Thomson site considerably increases the difficulty and expense. Limiting logistical flexibility as would be required by Alternatives C, D, and E in one aspect or another elevates Project execution risk considerably while at the same time creating additional risk to personnel safety, health, emergency response and the environment. Chapter 2 accurately represents technical information related to how the Project and the alternatives might be executed. Safety is a paramount consideration for ExxonMobil. As has been shown in the Practicability Analysis and other communications with the EIS agencies, there are serious safety concerns that come into play with the Alternatives. Safety must be given sufficient weight in the 404(b)(1) Guidelines analysis and Record of Decision. ***2.3.2.1 Increased Execution Risk to Construction*** The Alternatives increase risk to construction schedule and execution certainty. Executing construction activities at a remote location when drilling and other simultaneous activities are undertaken requires careful planning and sequencing to ensure safety and that materials, supplies and equipment are transported to the site when they are needed. Gravel work, pile driving, equipment installation, and drilling overlap at certain times and at different places in the Project area and each has specific logistical support requirements. They require precise planning and execution to ensure necessary equipment and material will be available for the work to be completed on schedule. If not accomplished, this can result in the work being carried over to a following season thereby delaying project completion and potentially introducing new conflicts with activities scheduled for that season. ***2.3.2.2 Increased Execution Risk to Module Delivery*** Technology is one of the components of practicability. As explained in the Practicability Analysis and response to Request for Information No. 24, the proven limits of module size for overland ice road transport is about 1300 tons. Even within this proven size, there are transportation risks associated with the multiple handling of modules and actual transportation over ice roads. ExxonMobil originally considered delivery of modules via ice road as would be required by Alternatives C and D. A modularization study was conducted during the conceptual ExxonMobil DEIS Comments 10	

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engineering phase of the project to investigate all options for transporting facilities to Point Thomson ranging from all-truckable modules to larger sealift modules. It was determined that consolidating facilities and infrastructure into larger sealift modules (potentially up to 4,000 tons) and transporting them directly to the site by sealift barge significantly increases execution certainty and efficiency. In this case, execution certainty refers to the ability to transport the modules from the point of origin, offload them at the site, and successfully install /commission them by a specified date. Modules of the size that can be sealifted directly to the site also reduce the number of personnel and risks associated with working in a remote arctic environment by maximizing work performed in an established offsite fabrication facility. As explained above, this activity must be coordinated with other activities within the limited space of the pad and Project area. Transporting modules over long ice roads as would be required in Alternatives C and D involves an increased risk of failures and environmental incidents. The risks stem from transporter equipment durability, ice road failures, weather impacts, and fuel and hydraulic fluid management. Potential impacts to the environment could occur from these failures due to load instability, hydraulic line failures, and mechanical breakdowns (Practicability Analysis, Appendix D and Technical Brief - Module Transport). Finally, allowing modules to travel by barge for thousands of miles only to stop 50 miles short of the destination, offload and transport them to a storage site, then re-mobilize them several months later (triple handling) is illogical given that the negligible and mitigated impacts of additional barge travel contrasted with the risks of transporting large modules over long distance ice roads. *2.3.2.3 Infield Gravel Roads* Alternative E eliminates infield gravel roads between the Central, East and West Pads. The significant constraints that are imposed when there is no year-round infield road access are clearly demonstrated by the Alpine CD-3 development, which has a fuel line and gravel airstrip. Personnel have been stranded at the CD-3 pad by bad weather for several days at a time. Drilling operations at CD-3 are a particular challenge and incur additional costs and inefficiencies due to the logistical limitations. The CD-3 pad necessarily must contain additional supplies, maintenance equipment, spill response equipment and emergency living quarters. The Practicability Analysis showed how the lack of gravel roads for all season access between the Central and East and West Pads in Alternative E would have potentially serious implications for safety and emergency response, health, and environmental risks. Ice roads between these pads would only be available for about three months of the year. Other overland access to the East and West Pads is limited to tundra travel when seasonally allowed by DNR using limited capacity vehicles. Helicopters dedicated to the project would become a critical need and source of additional noise and related environmental impacts. If infield gravel roads are not constructed, an emergency shelter for personnel safety at East and West Pads would be required at a safe distance from the wells in the event of a serious well control incident and for workers that may be stranded due to weather. This will result in an increase in pad footprint. This situation would involve more risk to personnel than there would be with year round connecting infield roads. ExxonMobil DEIS Comments 11	

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2.3.3 The Alternative E Airstrip Severely Reduces Logistical Capability Without Significant Environmental Benefit

The shorter airstrip in Alternative E would only accommodate cargo aircraft with load capacities of about 5000 lbs. DC-6 aircraft are planned for routine cargo flights during project construction and operations, while C-130 aircraft would be essential in the event of a major spill response or other emergency event requiring transport of large equipment and large amounts of supplies. A DC-6 aircraft can carry about 24,000 lbs. Eliminating the capability to use this aircraft and reducing the aircraft cargo capacity to 5,000 lbs. will increase the number of cargo flights and associated environmental impacts by a commensurate amount.

2.3.4 Barging is a Routine and Essential Activity Throughout Coastal Alaska

An important context for barging is the routine and essential nature of the activity and its importance to commerce and the economy of coastal Alaska communities, particularly those that are not connected to the road system. Marine transportation plays a crucial role for delivery of cargo to NSB communities. Materials too large or expensive to ship by cargo aircraft – such as bulk goods, building materials, fuel and vehicles – are transported by barge each summer to these communities.

Barge related oil industry operations have occurred on the North Slope for over 40 years. Recently, the Prudhoe Bay West Dock had 182 barge landings made in 2010 and approximately 50 were made in 2011. Northstar makes over 25 barge trips per season during its current operations and made hundreds per year during construction. Between 2006 and 2008, alone, barges servicing oil and gas programs made over 400 trips between July and October ranging annually from 7,270 to 15,534 miles[7].

The combination of barging, ice roads and air access to the proposed Project allows more regular delivery and resupply during project construction and operations, and reduces the amount of storage space needed on gravel pads.

As described above, ExxonMobil's experience during the drilling program demonstrated barging can be safely conducted without impacts to marine mammals, other coastal resources, or subsistence. Approximately the same level of barging is anticipated for Project construction and drilling as was undertaken for the drilling program, and significantly less will be required for operations. As part of the Project mitigation program, ExxonMobil has committed to continue consultation with Kaktovik, to conduct barging under the terms of a CAA, and to avoid barging during periods of subsistence whaling to the greatest extent practicable. All barging, including any that may be necessary during whaling, will comply with the CAA's proactive measures to avoid conflicts between industry vessels and subsistence whalers.

Given the innovative approach to minimize in water facilities to support barging, the generally benign nature of barging, the documented experience of safe operations with no adverse impacts, and the comprehensive mitigation measures established by ExxonMobil's commitments and specific requirements of the CAA, there is no basis to eliminate barging[8].

2.4 Cost

Cost is an important element of practicability. While all of the elements are interrelated, logistics is a principal driver affecting the Project costs due to the Project's remote location.

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7 Funk et al. 2009. Full citation can be found in the Draft Biological Assessment of the Bowhead Whale (Balaena Mysticetus), Ringed Seal (Phoca Hispada), and Bearded Seal (Erignathus Barbatus); included as Appendix M of the DEIS.

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ExxonMobil conducted a detailed evaluation of the cost differences between Alternative B and the other action alternatives in the Practicability Analysis. This cost analysis was based on the best Project cost estimates available at the time. Conceptual execution plans and schedules were developed by ExxonMobil for each of the action alternatives. The cost analysis identified many drivers that significantly increased project costs for Alternatives C, D and E. Some of these cost categories were unique to a specific alternative (e.g. gravel access road for Alternative C) and others common to all action alternatives (reengineering and escalation costs of extending project schedule). The resulting cost increases were so large as to make the alternatives impracticable from a cost standpoint. **2.5 Technology** Technology is the third element of practicability. There are two key technology challenges related to Alternatives C and D. The first is the requirement to transport the facility modules overland using ice roads from the Prudhoe Bay area. This is discussed above in these comments. . The second technology challenge related to Alternatives C and D relates to long reach directional drilling (LRDD) limitations and the one-half mile set back of the East and West well pads from the coast. This technology limitation is discussed in the following section. **2.6 The Reservoir Location and Drilling Technology Limitations Determine the Coastal Well Pad Locations** ExxonMobil's Project Purpose and Need in Tab 19 of ExxonMobil's Section 404/10 Permit Application October 2011 states: *"A principal goal of the Project is to establish a design footprint that facilitates future full field development of the reservoir and delineation of the hydrocarbon resources of the PTU with the least environmental impact practicable. The Project features a three-pad configuration, the optimal development design for resource recovery, delineation and conservation, and encompasses the smallest footprint necessary for these purposes. The configuration of the Project is designed to delineate and produce reservoir resources using LRDD techniques from onshore pads."* As shown in Figure 1 below, the Thomson Sand reservoir is predominately offshore. As discussed in the Environmental Mitigation Report, from a drilling and reservoir development perspective only the optimal sites for many of the well surface locations would be offshore because the offshore portions of the reservoir could be accessed by drilling vertical or shallower angle directional wells. They were not pursued, for this project, however, because there are practicable options to develop the reservoir from onshore well locations using LRDD. The Project well pad locations and potential reservoir targets rely upon drilling wells that are at the industry limits of LRDD. This is illustrated in Figure 2 which plots drilling mud weight vs. horizontal departure (drilling mud weight is a measure of density, expressed in pounds per gallon, and relates to reservoir pressure). At a depth of 13,200 feet and over 10,000 psi reservoir pressure, the Thomson Sand is an "abnormally pressured" reservoir, which means it has a higher pressure than normal for a given depth, and must be drilled with higher density drilling mud (e.g., higher mud weights) than normally pressured reservoirs. The mud weights required to drill and complete Thomson Sand wells are among the highest used on a world-wide ExxonMobil DEIS Comments 13	

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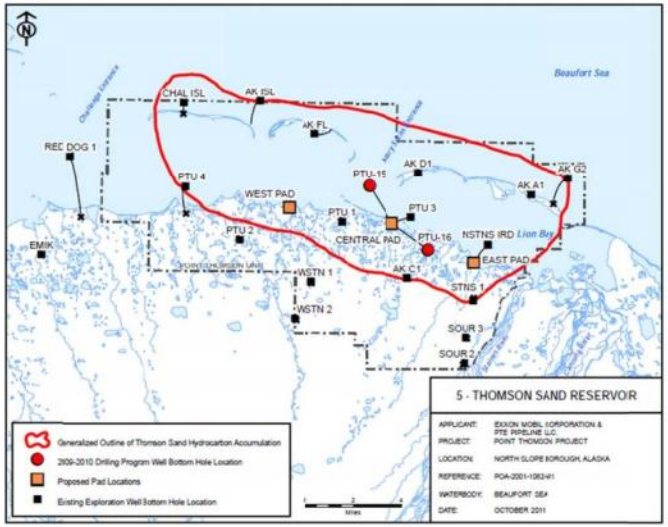
basis. The maximum feasible horizontal reach of directional drilling into the Thomson Sand is limited to about 13,000 feet. **Figure 1 – The Relation of Coastal Well Pad Locations to Thomson Sand Reservoir**  As shown in figure 2, the well pads are at or near the limits of reach. The State has independently verified this constraint (RFI 63). Moving the pads inland limits the ability to drill wells into the offshore portions of the reservoir which limits flexibility in evaluating the reservoir. It could also potentially reduce resource recovery in full development scenarios (e.g. expanded gas cycling, gas sales) or potentially require placing additional pads in the future. ExxonMobil DEIS Comments 14	

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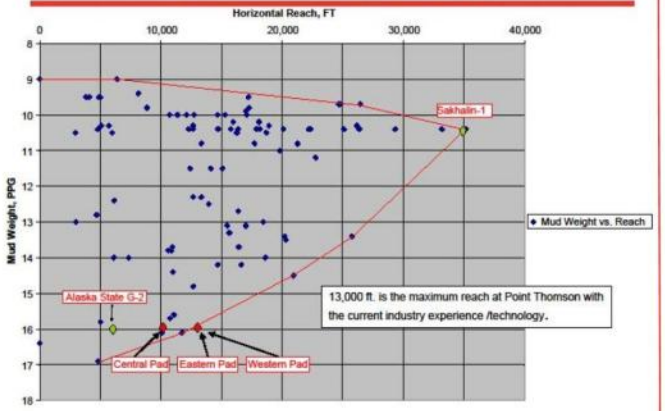
Figure 2 - Industry Reach vs. Mud Weight



This issue is recognized in the DEIS (Appendix C – Draft Section 404(b)(1) Guidelines Evaluation, Section 2.1.2, The Corp's Basic Project Purpose) which states:

> *Access to the hydrocarbon reservoir is constrained to a zone defined by the technological limits of drilling. These limits constrain the location of potential drilling and well pads to on and offshore locations in the Point Thomson area and in close proximity to the Beaufort Sea Coastline.*

The DEIS (Executive Summary, page ES-64) also acknowledges that moving the pads inland may lead to further pads in the future:

> *Moving the pads inland would have the potential trade-off that future additional pads may be needed to fully access and develop the Point Thomson reservoir. Coastal pads could be deemed necessary if, upon fully delineating the reservoir and determining the extent of reservoir connectivity, it is determined that access into more northern or eastern portions of the reservoir would be required to fully develop the resource.*

2.6.1 The Location of Proposed Pads Avoids the Potential Need to Construct Additional Well Pads for Reasonably Foreseeable Future Development

A fundamental purpose of the Project is to further delineate the field. Although there is good quality seismic data and numerous wells have been drilled in the project area (18 of the 21 wells drilled to date define the location and areal extent of the Thomson Sand reservoir), there is an ongoing need to better understand the nature of the reservoir, optimum bottom-hole locations,

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Public Notice for Permit Application 619 continuity in the hydrocarbon bearing formation and other highly technical issues. It is important to recognize that six of these 21 wells were drilled from barrier island locations and were beyond the reach of directional drilling from the mainland at the time they were drilled. There is still uncertainty in the interpretation and definition of the reservoir, in both structure and quality, and this requires retaining maximum flexibility in placing well bottom-hole targets. Key points include: • Preserving the ability to reach the maximum amount of the reservoir is essential to allow for full investigation of the extent, nature and connectivity of the reservoir. • The reservoir understanding will change as additional wells are drilled, more information is gathered, and the reservoir interpretation refined. Potential changes in the reservoir understanding and subsequent changes to bottom-hole targets can be best managed by maintaining access to as much of the reservoir area located offshore as possible. Onshore and near shore bottom-hole targets alone may not accommodate potential changes in the reservoir understanding. • Pad location further inland from the coast will increase the horizontal departure on all wells with offshore targets and potentially preclude the ability to reach portions of the reservoir necessary for full field development. This may lead to additional pads being needed in the future to reach bottom-hole targets that cannot be reached from more inland pads. Future potential development options such as gas sales development and expanded gas cycling, are not part of the current Project, but are reasonably foreseeable actions. A key purpose of the Project is to provide the optimum footprint for Project operations that will also accommodate potential development options to accomplish full field development while avoiding redundant infrastructure in the form of additional pads thereby minimizing overall environmental effects. In this important regard, the proposed three well pad locations near the coastline allow wells to be drilled that will adequately evaluate and develop the Thomson Sand reservoir without the need for additional pads. The DEIS (Chapter 2 pages 2-106 and 2-107) questions the degree to which the reservoir can be accessed from more inland pads, a portion of which states: *With currently available public information, it is not possible to determine how far inland the pads could be moved and still access the reservoir to fully develop the resource.* The issue is not simply a lack of publicly available information. As described above, until additional wells are drilled and related data obtained, the information does not exist to definitively identify whether or how far the pads could be moved before additional pads would be required for full field development. On this basis, ExxonMobil has proposed locating the pads close to the coast, while still providing a conservative setback for coastal erosion and to avoid impacts of the pads upon coastal processes. ExxonMobil believes this provides the best capability to develop the reservoir and to minimize overall environmental impacts. ExxonMobil recommends the Corps consider the risk that future pads may be required under Alternatives C and D in determining the LEDPA under the 404 (b)(1) Guidelines and in the Corps' Record of Decision. ExxonMobil DEIS Comments 16	

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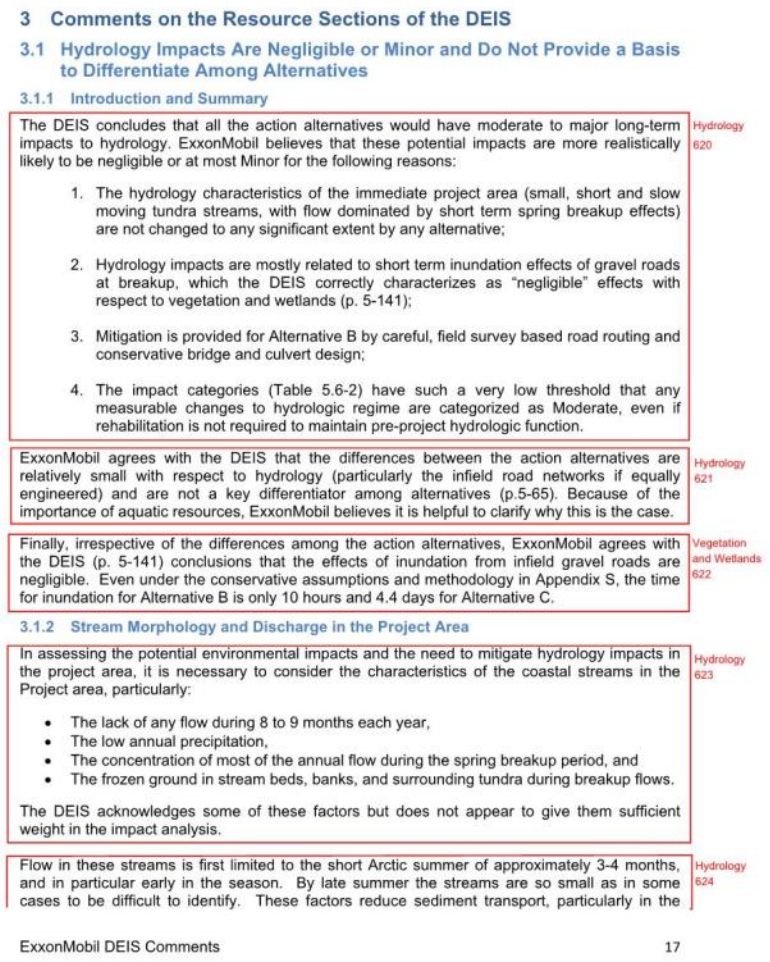
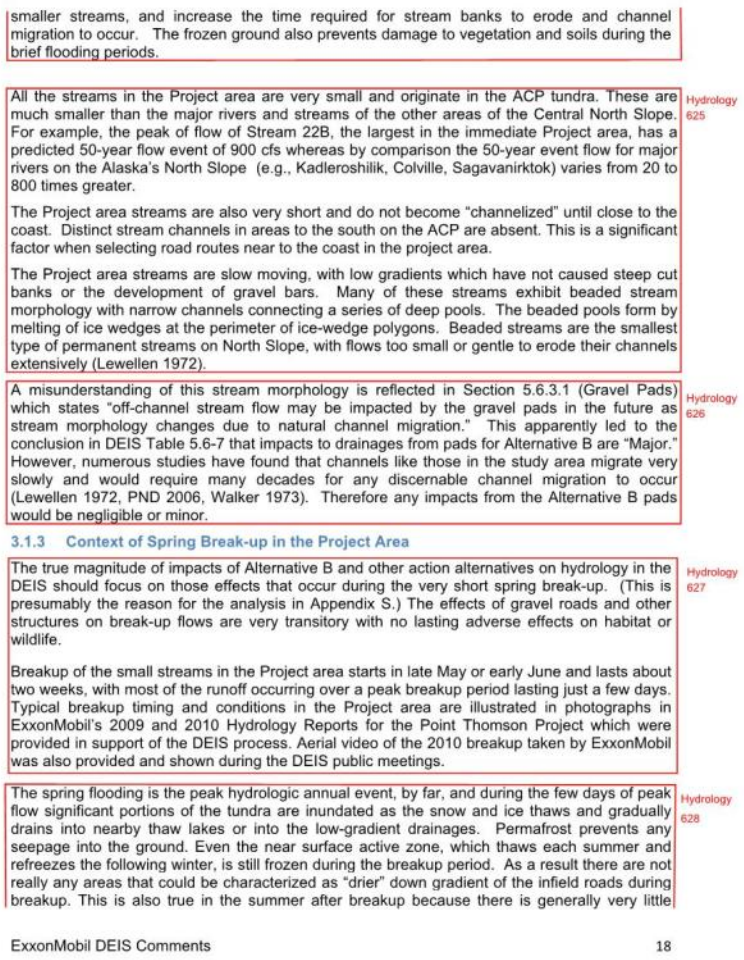
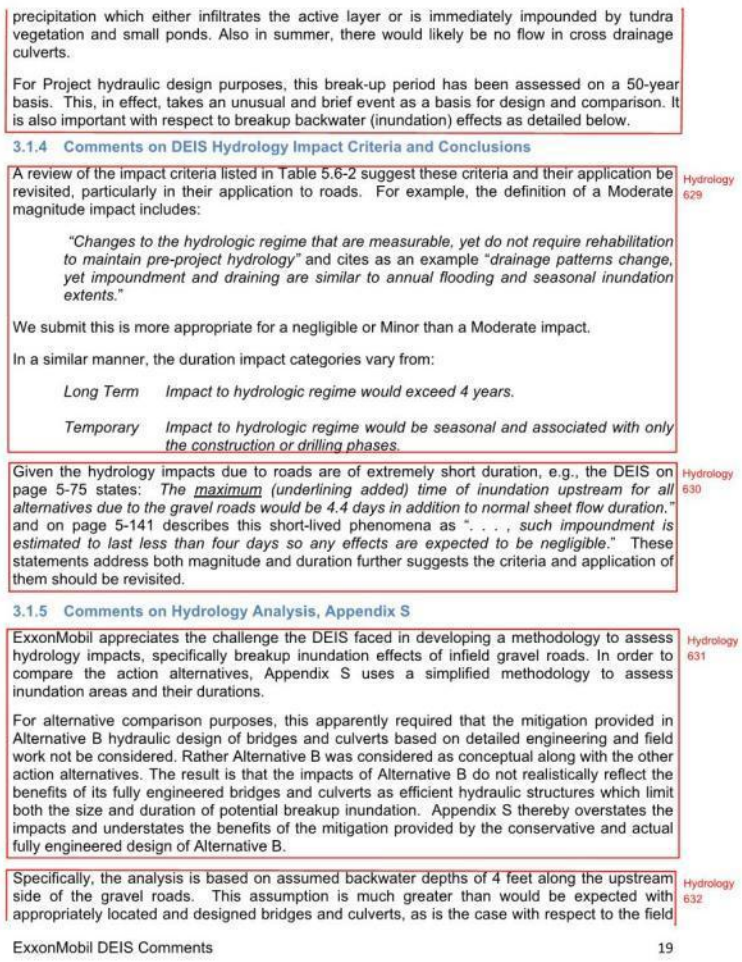
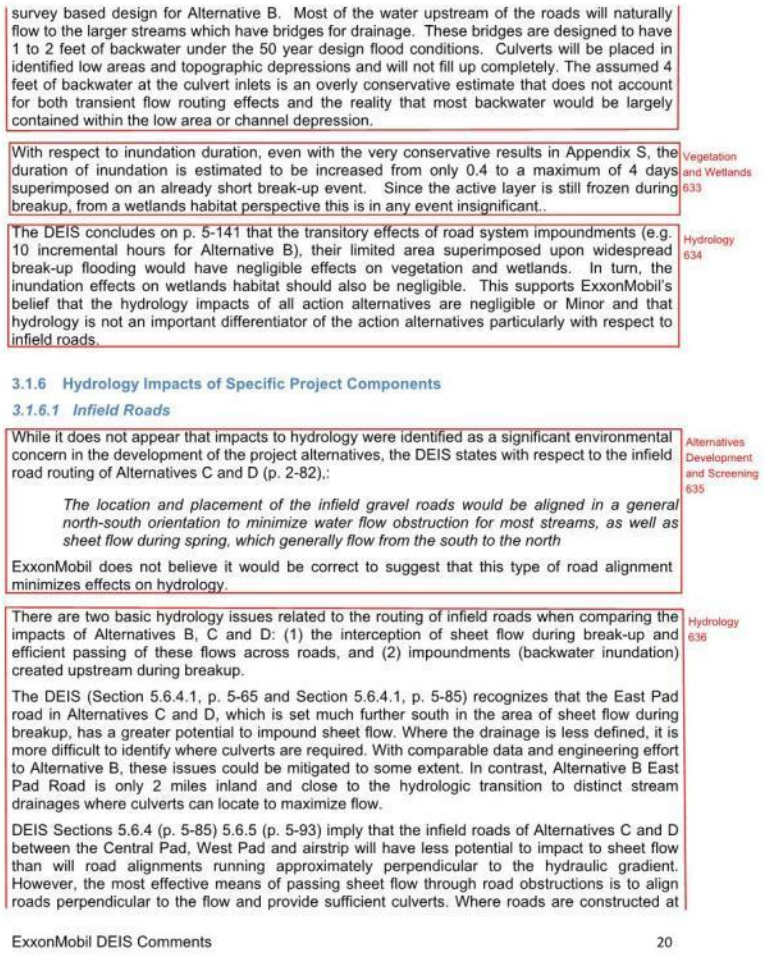
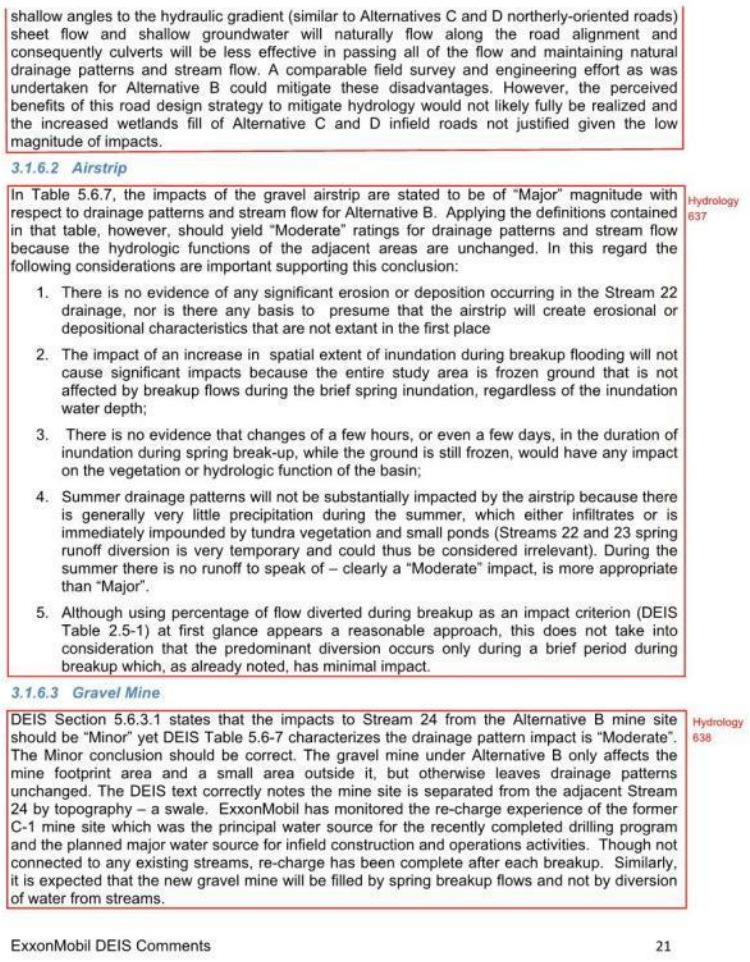
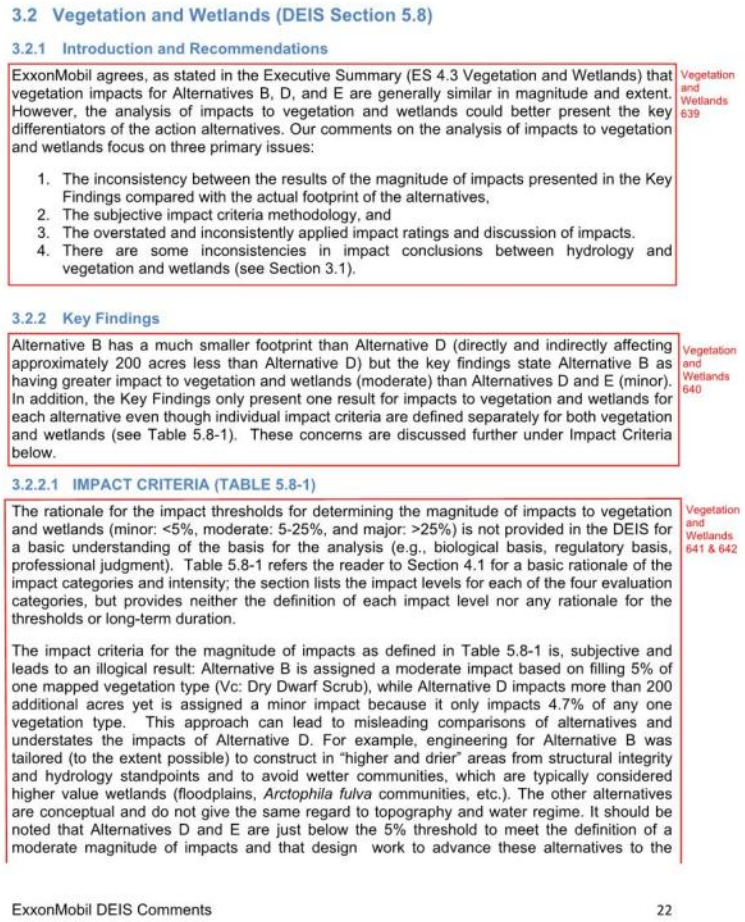
	620 The magnitude determinations for hydrology impacts must be viewed within the context of the established criteria, even though they may have conservative thresholds. Further: (1) the analysis assessed such factors as whether water would be diverted, an increase or decrease in sediment transport would occur, or a change in flow volume would occur; (2) the factors assessed for hydrology impacts were not the same as those assessed for vegetation and wetland impacts, and therefore the impact determinations for these two resource areas should not be compared; (3) the EIS assumes the same mitigation for all similar components, and (4) the terms used for magnitude are defined in the methodology section (Section 5.6.1). 621 The Key Impact Finding and Differentiators for hydrology (page 5-65 of the Draft EIS) is intended to provide a brief summary of the conclusions. Explanations of the hydrology impacts assessment are included throughout Section 5.6, Hydrology, and a more detailed summary is provided in Section 5.6.9, Alternatives Comparison and Consequences. 622 Comment noted; no action required. 623 The characteristics of the coastal streams were described in Section 3.6, Hydrology, and were taken into consideration for the hydrology impacts analysis. The fact that the small streams do not have flow for the majority of the year does not mean that impacts, when they do occur, are of lesser magnitude. Larger rivers are also present in the project area considered by the EIS. Three large rivers are crossed by various project components depending on the alternative. 624 Characteristics of the streams in the project area are described in Section 3.6, Hydrology.

Comment	Response
	625 Information regarding streams and rivers in the study area is provided in Section 3.6, Hydrology. As described in the EIS, not all water bodies in the study area considered by the EIS are small and originate on the ACP. The Kadleroshik, Sagavanirktok, and Shaviovik are larger water bodies with drainage basins extending beyond the ACP. These rivers would be crossed by the tundra ice road under Alternatives B, D and E and by the gravel access road and export pipeline under Alternative C. 626 The impact determinations are based on the impact criteria. The gravel pads would have a major impact on drainage patterns because there would be no drainage through the pads. The gravel roads would be constructed with culverts and bridges to allow drainage, therefore impacts would be moderate. Although the magnitudes of the gravel pad impacts are major, the extent is "local." The Corps agrees that channel migration would be very slow and the following sentence was deleted for clarity in Section 5.6.3.1 under Gravel Pads: "However, streams exist less than one-half mile from each of the proposed pad locations, and off-channel streamflow may be impacted by the gravel pads in the future as stream morphology changes due to natural channel migration." 627 The analysis of hydrology impacts does recognize the spring breakup period. That fact that this period is short does not affect the magnitude of the impacts, as defined by the impact criteria. 628 Whether the ground is frozen or not, the areas upstream of the road would be somewhat wetter and the areas downstream would be drier. In terms of the summertime, there are precipitation events in the summer, although their magnitude is rarely near that of breakup.

Comment	Response
	629 The Corps has considered the commenter's recommendations for improvements to the impact criteria and has made the decision not to incorporate the recommendations in the Final EIS. The Corps and cooperating agencies developed and agreed to the framework and general methodology for impact criteria (see Chapter 4), which provides a solid framework for analyzing impacts to the environment. The resource-specific impact criteria definitions presented in Chapter 5 were based on scientific literature and the best professional judgment of the Corps, cooperating agencies, and third-party EIS contractor subject matter experts. The definitions allow for analyses based on quantitative data, where available, and qualitative information and best professional judgment where quantitative data were unavailable. The Corps also believes that the impact categories of minor, moderate, and major are sufficient and will not be including a category of "negligible" in the Final EIS. 630 The quoted conclusions regarding wetlands impacts ("…, such impoundment is estimated to last less than four days so any effects are expected to be negligible.") should not be applied to the hydrology impacts because the two resources were assessed separately based on different impact criteria. 631 In order to compare alternatives, the analysis in Appendix S had to make general assumptions relative to the design of bridges and culverts to be consistent between the alternatives. The analysis in Appendix S was conservative and still showed there were negligible impacts to wetlands and vegetation so the analysis was not refined further. Text has been added to Section 5.6.3.1, Alternative B: Construction, Drilling, and Operations, to clarify the purpose of the analysis in Appendix S and the assumptions used: "The analysis in Appendix S is intended to provide a conservative estimate of the duration of inundation upstream of gravel fill roads during breakup. The purpose of estimating inundation time is to determine whether it could potentially be long enough to affect vegetation growth. Although preliminary engineering is available for one alternative that would affect the calculation of inundation times, it is not available for other alternatives. In order to provide a comparison across alternatives, the same conservative assumption that up to 4 feet of water could be impounded upstream of the gravel road was applied." 632 See the response to Comment 631.

Comment	Response
	633 The Corps agrees with this statement. The Draft EIS makes the following statement on page 5-141: "While impoundment of water upgradient from a road during spring snowmelt could extend well over 1,000 feet upgradient of a road, such impoundment is estimated to last less than four days so any effects are expected to be negligible..." 634 The Corps agrees that hydrology is not an important differentiator of the action alternatives with respect to gravel infield roads and that conclusion was taken into account in the comparison of alternatives. The conclusions regarding wetlands impacts (effects are expected to be negligible) should not be applied to the hydrology impacts, because the two resources were assessed separately based on different criteria. 635 During scoping, the federal cooperating agencies voiced a general concern that roads oriented perpendicular to surface water flow on the North Slope have greater impacts than roads oriented parallel to the flow. The sentence in Section 2.4.4.3, Alternative C: Access and Transportation, "The location and placement of the infield gravel roads would be generally aligned in a north-south direction, parallel to the existing hydrologic drainage patterns" has been changed to: "With the exception of the road to the East Pad, the location and placement of the infield gravel roads would be generally aligned in a north-south direction, parallel to the existing hydrologic drainage patterns." Additionally the following sentence in Section 2.4.5.3, Alternative C: Access and Transportation: "The location and placement of the infield gravel roads would be aligned in a general north-south orientation to minimize water flow obstruction for most streams, as well as sheetflow during spring, which generally flow from the south to the north" was changed to "The location and placement of most infield gravel roads would be generally aligned in a north-south direction, parallel to the existing hydrologic drainage patterns." 636 Relative to the hydrology impacts from the infield roads, there are tradeoffs between having the roads located at the coast versus farther inland. For example, crossings for more defined stream channels (conditions closer to the coast) are more easily engineered because the locations are defined and discharges are easier to estimate. Without defined channels, subtle local conditions control where the majority of water is. This can make optimum culvert placement difficult and increase the potential for diverting water from one watershed to another. Without a defined channel, there is rarely an aquatic environment (i.e., plants, macros, and fish) that can be disturbed. However, for perennial channels, the crossing structures are more likely to disturb aquatic organisms, disturb the substrate, and increase erosion. The Corps does not believe that either scenario is clearly favored based on consideration of other resource impacts.

Comment	Response
	637 1. The fact that significant erosion or deposition is not evident in the Stream 22 drainage doesn't mean it can't happen anywhere in the project area; 2. This statement is consistent with the Corps' findings; 3. This statement is relevant to the wetlands impact analysis, not hydrology; 4. It is agreed there is little runoff during the summer but that does not change the conclusions; and 5. The short time period for spring breakup is not relevant to the magnitude determination. The magnitude of impacts for the airstrip under Alternative B has not been changed. 638 Under Gravel Mine, Section 5.6.3.1 states: "The gravel mine would have minor impacts to Stream 24 because it is partially separated by topography and would have moderate impacts to Stream 23." Table 5.6-7 reflects the potential for moderate impacts to Stream 23.

Comment	Response
 3.2 Vegetation and Wetlands (DEIS Section 5.8) 3.2.1 Introduction and Recommendations ExxonMobil agrees, as stated in the Executive Summary (ES 4.3 Vegetation and Wetlands) that vegetation impacts for Alternatives B, D, and E are generally similar in magnitude and extent. However, the analysis of impacts to vegetation and wetlands could better present the key differentiators of the action alternatives. Our comments on the analysis of impacts to vegetation and wetlands focus on three primary issues: 1. The inconsistency between the results of the magnitude of impacts presented in the Key Findings compared with the actual footprint of the alternatives, 2. The subjective impact criteria methodology, and 3. The overstated and inconsistently applied impact ratings and discussion of impacts. 4. There are some inconsistencies in impact conclusions between hydrology and vegetation and wetlands (see Section 3.1). Vegetation and Wetlands 639 3.2.2 Key Findings Alternative B has a much smaller footprint than Alternative D (directly and indirectly affecting approximately 200 acres less than Alternative D) but the key findings state Alternative B as having greater impact to vegetation and wetlands (moderate) than Alternatives D and E (minor). In addition, the Key Findings only present one result for impacts to vegetation and wetlands for each alternative even though individual impact criteria are defined separately for both vegetation and wetlands (see Table 5.8-1). These concerns are discussed further under Impact Criteria below. Vegetation and Wetlands 640 3.2.2.1 IMPACT CRITERIA (TABLE 5.8-1) The rationale for the impact thresholds for determining the magnitude of impacts to vegetation and wetlands (minor: <5%, moderate: 5-25%, and major: >25%) is not provided in the DEIS for a basic understanding of the basis for the analysis (e.g., biological basis, regulatory basis, professional judgment). Table 5.8-1 refers the reader to Section 4.1 for a basic rationale of the impact categories and intensity; the section lists the impact levels for each of the four evaluation categories, but provides neither the definition of each impact level nor any rationale for the thresholds or long-term duration. The impact criteria for the magnitude of impacts as defined in Table 5.8-1 is, subjective and leads to an illogical result: Alternative B is assigned a moderate impact based on filling 5% of one mapped vegetation type (Vc: Dry Dwarf Scrub), while Alternative D impacts more than 200 additional acres yet is assigned a minor impact because it only impacts 4.7% of any one vegetation type. This approach can lead to misleading comparisons of alternatives and understates the impacts of Alternative D. For example, engineering for Alternative B was tailored (to the extent possible) to construct in "higher and drier" areas from structural integrity and hydrology standpoints and to avoid wetter communities, which are typically considered higher value wetlands (floodplains, *Arctophila fulva* communities, etc.). The other alternatives are conceptual and do not give the same regard to topography and water regime. It should be noted that Alternatives D and E are just below the 5% threshold to meet the definition of a moderate magnitude of impacts and that design work to advance these alternatives to the Vegetation and Wetlands 641 & 642 ExxonMobil DEIS Comments 22	639 This comment summarizes more specific comments related to vegetation and wetlands. See responses to the specific comments below (Comments 640-651 and 3444-3446). 640 The impact evaluation defined an impact based on the percentage of a type of wetland/vegetation type, which sometimes did not correspond with the greatest overall amount of wetlands fill or impact. The Key Findings for Section 5.8 has been revised in the Final EIS to clarify this. The intent of the Key Findings text box was to highlight the impact findings that provided the greatest amount of differentiation among the alternatives. 641 The Corps has considered the commenter's recommendation for improvements to the impact criteria and has made the decision not to incorporate the recommendations in the Final EIS. The Corps and cooperating agencies developed and agreed to the framework and general methodology for impact criteria (see Chapter 4), which provides a solid framework for analyzing impacts to the environment. The resource-specific impact criteria definitions presented in Chapter 5 are based on scientific literature and the best professional judgment of the Corps, cooperating agencies, and third-party EIS contractor subject matter experts. The definitions allow for analyses based on quantitative data, where available, and qualitative information and best professional judgment where quantitative data were unavailable. The Corps also believes that the impact categories of minor, moderate, and major are sufficient and will not be including a category of "negligible" in the Final EIS. The impact criteria for vegetation and wetlands were intended to capture whether an alternative affected a disproportionate acreage of an uncommon or rare wetland type in study area that was defined in Section 3.8.1 of the Draft EIS (Key Information About Vegetation and Wetlands). Overall acreage of wetland fill was also evaluated in the Draft EIS but it was not included in the impact criteria and was not included in the impact summary tables for each alternative. The Corps agrees that the difference between 4.7 percent and 5 percent is small; however, the impact analysis process was followed consistently for each alternative and 4.7 percent and 5 percent were included in different impact categories for magnitude. As noted in this comment, the term "project area" is defined on page 3-1 of the Draft EIS and is used consistently throughout the document. Vegetation class and wetlands type are discussed in detail in Section 3.8 of the Draft EIS and the definitions are not repeated in Section 5.8 to reduce redundancy. As stated on page 5-126 in Section 5.8.1 of the Draft EIS: "Impacts within the footprints of project components were calculated by overlaying the project component footprints of each alternative onto the baseline vegetation and wetland mapping (Schick and Noel 1995; Noel and Funk 1998, 1999, 2001; OASIS 2009, 2010; HDR 2011i) described in Section 3.8, Vegetation and Wetlands, and calculating the areas of each vegetation and wetland type within the footprints." This statement clearly indicates that analyses of impacts for each alternative were

Comment	Response
	based on the same mapped area. Statements regarding Tables 5.8-3, 5.8-4, 5.8-6, 5.8-7, 5.8-9, 5.8-10, 5.8-12, and 5.8-13 are discussed in specific comments below.
	642 Wetland impacts were calculated based on vegetation classification as shown in Tables 5.8-3, 5.8-4, 5.8-6, 5.8-7, 5.8-9, 5.8-10, and 5.8-12. This is appropriate because more than 99 percent of the study area is considered wetlands. The intent of the Key Findings at the beginning of each section in Chapter 5 of the Draft EIS was to allow the reader to quickly grasp key "take home" messages about the impacts from each of the alternatives. For Section 5.8, Vegetation and Wetlands, the Key Findings has been revised in the Final EIS based on a previous comment.

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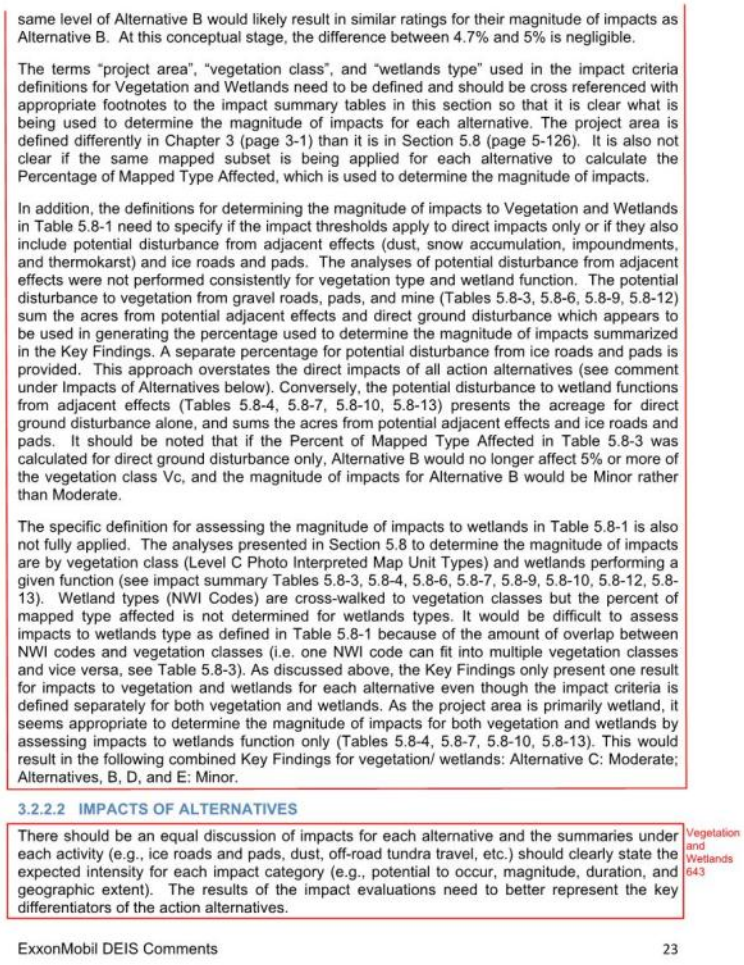	643 All sections of Chapter 5 were written to include a detailed discussion of impacts under Alternative B (the first action alternative presented) and to reference back to Alternative B where appropriate under the remaining alternatives. Impacts that occurred under Alternatives C, D, and E that were substantially different than Alternative B were discussed in detail, as warranted for the impact. This was done to reduce redundancy in the EIS.

same level of Alternative B would likely result in similar ratings for their magnitude of impacts as Alternative B. At this conceptual stage, the difference between 4.7% and 5% is negligible.

The terms "project area", "vegetation class", and "wetlands type" used in the impact criteria definitions for Vegetation and Wetlands need to be defined and should be cross referenced with appropriate footnotes to the impact summary tables in this section so that it is clear what is being used to determine the magnitude of impacts for each alternative. The project area is defined differently in Chapter 3 (page 3-1) than it is in Section 5.8 (page 5-126). It is also not clear if the same mapped subset is being applied for each alternative to calculate the Percentage of Mapped Type Affected, which is used to determine the magnitude of impacts.

In addition, the definitions for determining the magnitude of impacts to Vegetation and Wetlands in Table 5.8-1 need to specify if the impact thresholds apply to direct impacts only or if they also include potential disturbance from adjacent effects (dust, snow accumulation, impoundments, and thermokarst) and ice roads and pads. The analyses of potential disturbance from adjacent effects were not performed consistently for vegetation type and wetland function. The potential disturbance to vegetation from gravel roads, pads, and mine (Tables 5.8-3, 5.8-6, 5.8-9, 5.8-12) sum the acres from potential adjacent effects and direct ground disturbance which appears to be used in generating the percentage used to determine the magnitude of impacts summarized in the Key Findings. A separate percentage for potential disturbance from ice roads and pads is provided. This approach overstates the direct impacts of all action alternatives (see comment under Impacts of Alternatives below). Conversely, the potential disturbance to wetland functions from adjacent effects (Tables 5.8-4, 5.8-7, 5.8-10, 5.8-13) presents the acreage for direct ground disturbance alone, and sums the acres from potential adjacent effects and ice roads and pads. It should be noted that if the Percent of Mapped Type Affected in Table 5.8-3 was calculated for direct ground disturbance only, Alternative B would no longer affect 5% or more of the vegetation class Vc, and the magnitude of impacts for Alternative B would be Minor rather than Moderate.

The specific definition for assessing the magnitude of impacts to wetlands in Table 5.8-1 is also not fully applied. The analyses presented in Section 5.8 to determine the magnitude of impacts are by vegetation class (Level C Photo Interpreted Map Unit Types) and wetlands performing a given function (see impact summary Tables 5.8-3, 5.8-4, 5.8-6, 5.8-7, 5.8-9, 5.8-10, 5.8-12, 5.8-13). Wetland types (NWI Codes) are cross-walked to vegetation classes but the percent of mapped type affected is not determined for wetlands types. It would be difficult to assess impacts to wetlands type as defined in Table 5.8-1 because of the amount of overlap between NWI codes and vegetation classes (i.e. one NWI code can fit into multiple vegetation classes and vice versa, see Table 5.8-3). As discussed above, the Key Findings only present one result for impacts to vegetation and wetlands for each alternative even though the impact criteria is defined separately for both vegetation and wetlands. As the project area is primarily wetland, it seems appropriate to determine the magnitude of impacts for both vegetation and wetlands by assessing impacts to wetlands function only (Tables 5.8-4, 5.8-7, 5.8-10, 5.8-13). This would result in the following combined Key Findings for vegetation/ wetlands: Alternative C: Moderate; Alternatives, B, D, and E: Minor.

3.2.2.2 IMPACTS OF ALTERNATIVES

There should be an equal discussion of impacts for each alternative and the summaries under each activity (e.g., ice roads and pads, dust, off-road tundra travel, etc.) should clearly state the expected intensity for each impact category (e.g., potential to occur, magnitude, duration, and geographic extent). The results of the impact evaluations need to better represent the key differentiators of the action alternatives.

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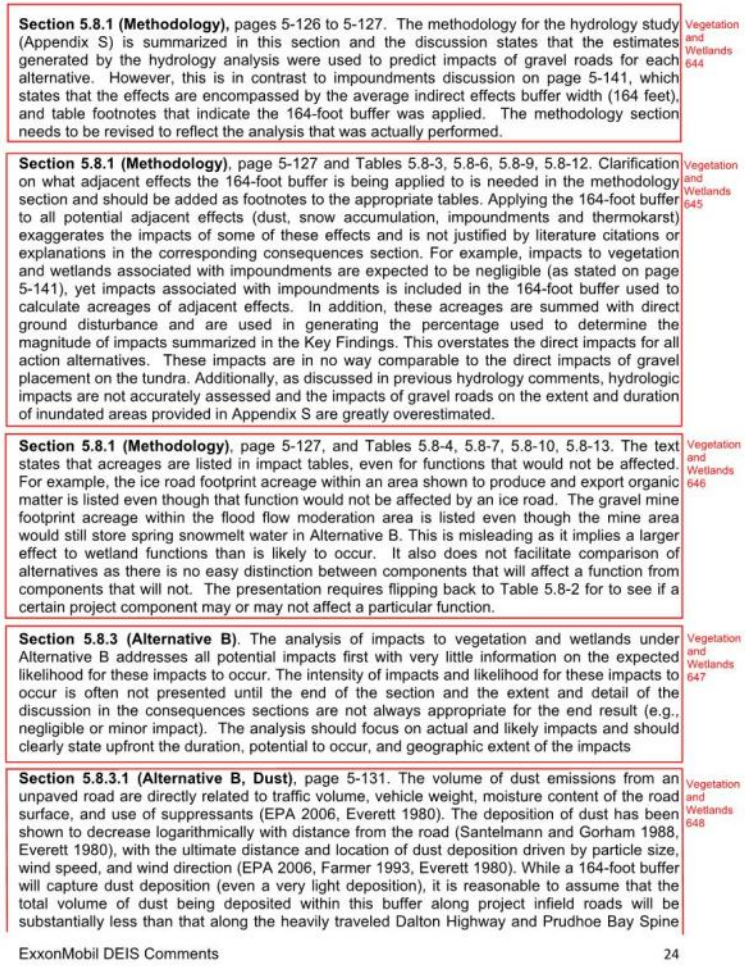
Comment	Response
	644 The text of Section 5.8.1, Methodology, was revised in the Final EIS to clarify that the analysis of impacts from impoundment was considered when predicting the impacts for each alternative. The revised sentence now reads: "The estimates generated by the above analysis were considered when predicting impacts of gravel roads for each alternative." See Section 5.8.3.1 under Impoundments on page 5-141 of the Draft EIS for how the consideration of hydrological analysis was incorporated into the analysis for Alternative B. 645 Indirect effects are interrelated, and the buffer does not apply to a single indirect effect. The 164-foot buffer refers to the area in which indirect effects on vegetation from snow accumulation, increased moisture, increased thaw depth, and dust deposition are most likely to occur. While the direct impacts are summed with the indirect impacts to determine the magnitude of impact, the direct and indirect impacts are shown independently of one another in the tables referenced in this comment as an aid to the reader. 646 Impacts to functions are listed by disturbance type in the tables referenced in this comment. Most of the disturbance types that would not have an effect on wetland functions are negligible and have not been quantified (e.g., winter water withdrawal, VSMs). Overall, impacts to wetland functions from all alternatives except Alternative C were considered minor. Under Alternative C, wetland function impacts were considered moderate because of the gravel access road. 647 Reorganizing the section would not change the analysis, impact evaluation, or overall findings, so no changes have been made to the text. 648 Indirect effects are interrelated and the buffer does not apply to dust alone. The 164-foot buffer used in Section 5.8,Vegetation and Wetlands, of the Draft EIS refers to the area in which effects on vegetation from snow accumulation, increased moisture, increased thaw depth, and dust deposition are most likely to occur. The reference used cites a multi-year study conducted on the West Dock Road in Prudhoe Bay. Traffic volume estimates were not provided by the Applicant for the Draft EIS for the infield gravel roads. While traffic volumes could be anticipated to be less for the Point Thomson Project, no other multiyear studies exist on less-traveled roads on the Arctic Coastal Plain and the reference cited is considered by the Corps to be the best available data.

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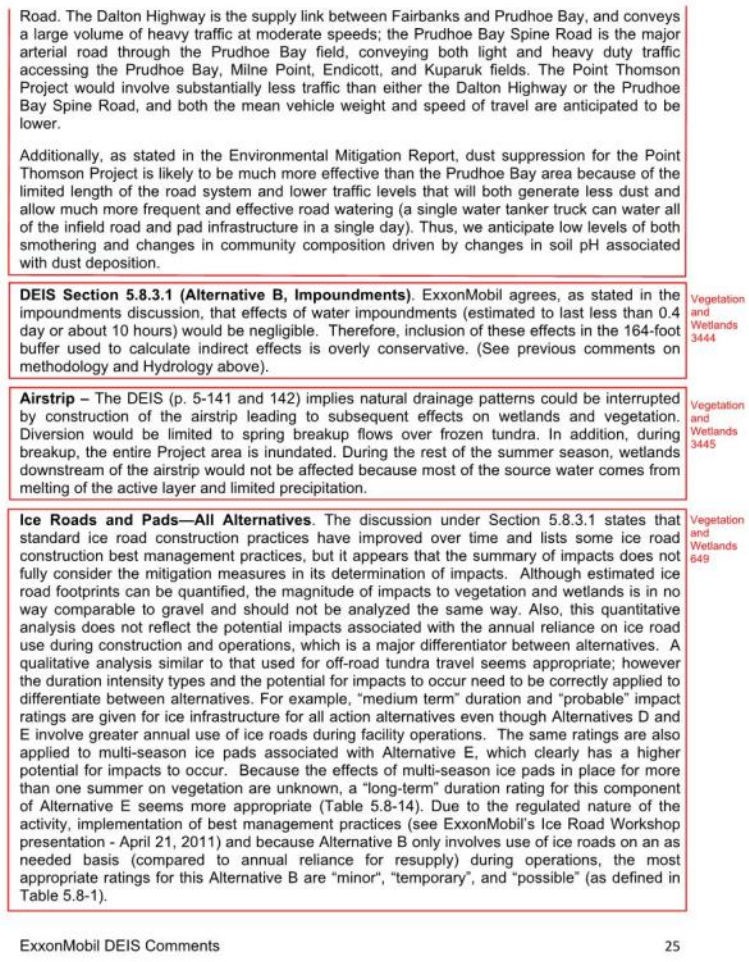
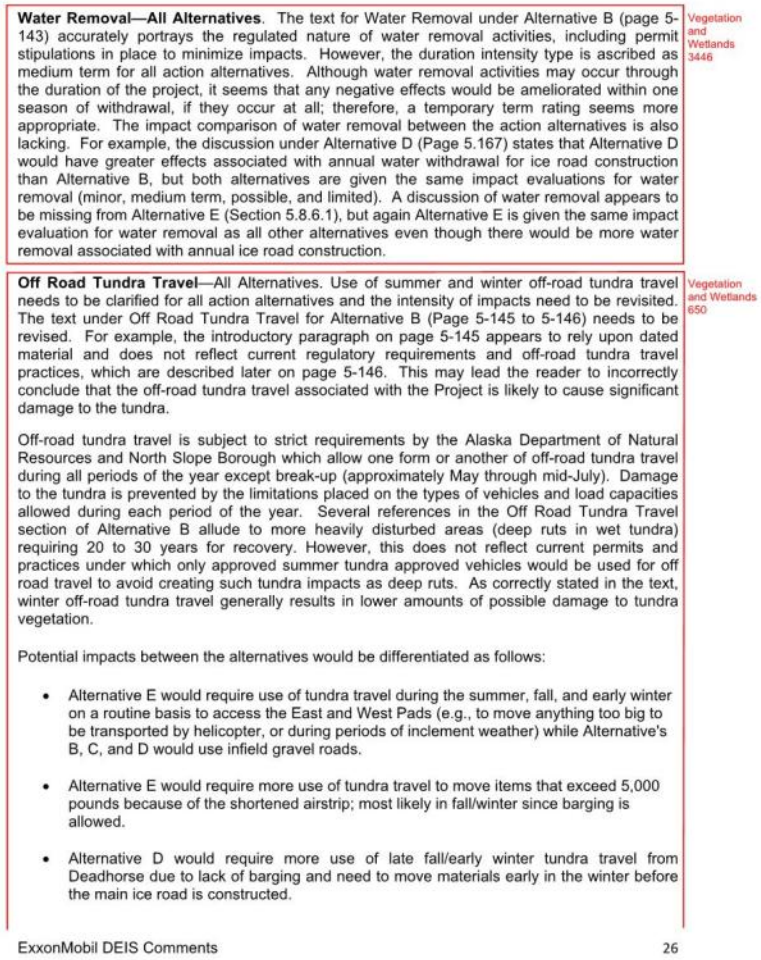
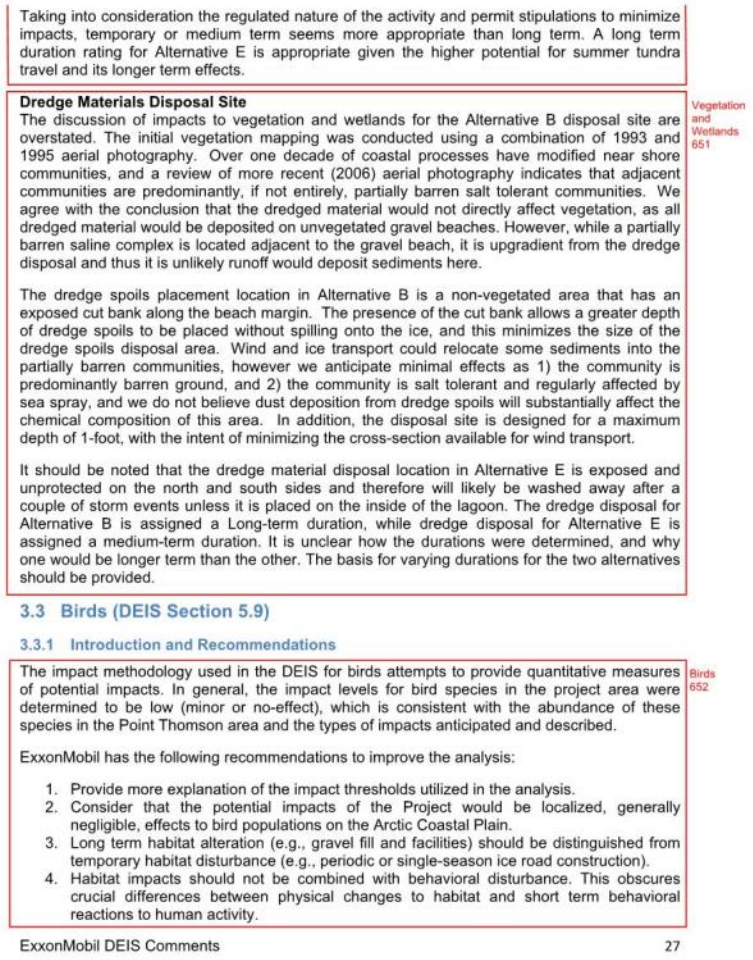
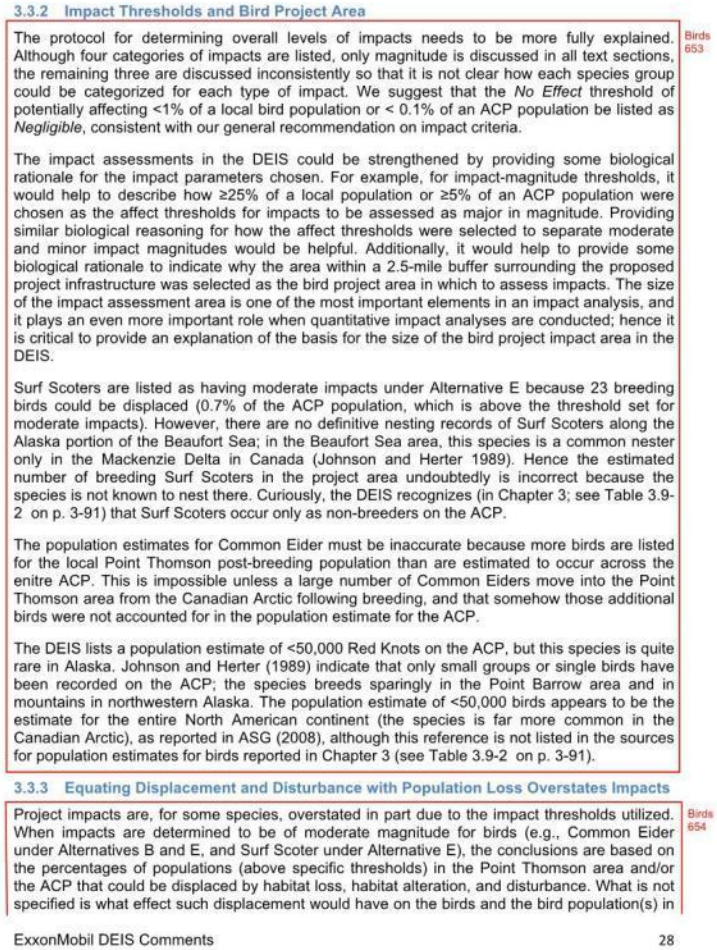
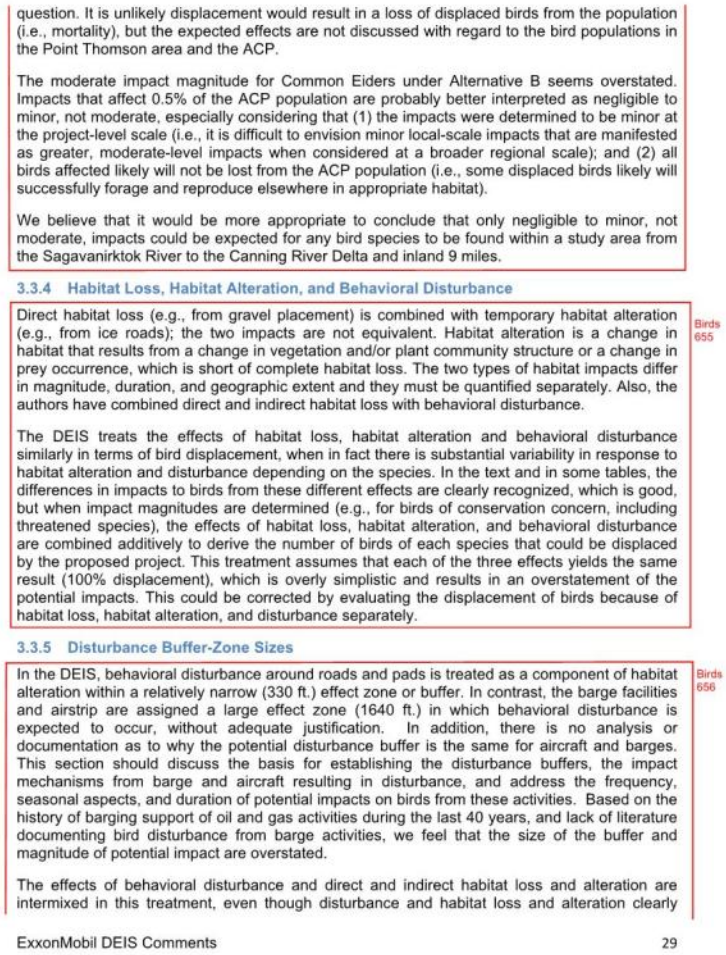
	3444 Indirect effects are interrelated and the buffer does not apply to a single indirect effect. The 164-foot buffer refers to the area in which indirect effects on vegetation from snow accumulation, increased moisture, increased thaw depth, and dust deposition are most likely to occur. 3445 Because culverts would not be placed in the airstrip, the potential to interrupt the natural drainage patterns for a longer period of time exists, which could lead to subsequent effects on vegetation and wetlands. 649 The Corps re-evaluated the impact analysis for ice roads and ice pads in Section 5.8, Vegetation and Wetlands, based on this comment. The Corps agrees that the impact criteria were not consistently applied for this analysis. The impact findings for ice roads and ice pads in Section 5.8 of the Final EIS are now as follows: Alternative B: Minor, Temporary, Possible, Local (revised from Minor, Medium Term, Probable, Local) Alternative C: Moderate, Temporary, Possible, Local (revised from Moderate, Medium Term, Probable, Local) Alternative D: Minor, Medium Term, Possible, Local (revised from Minor, Medium Term, Probable, Local) Alternative E: Minor, Medium Term, Probable, Local (no change)

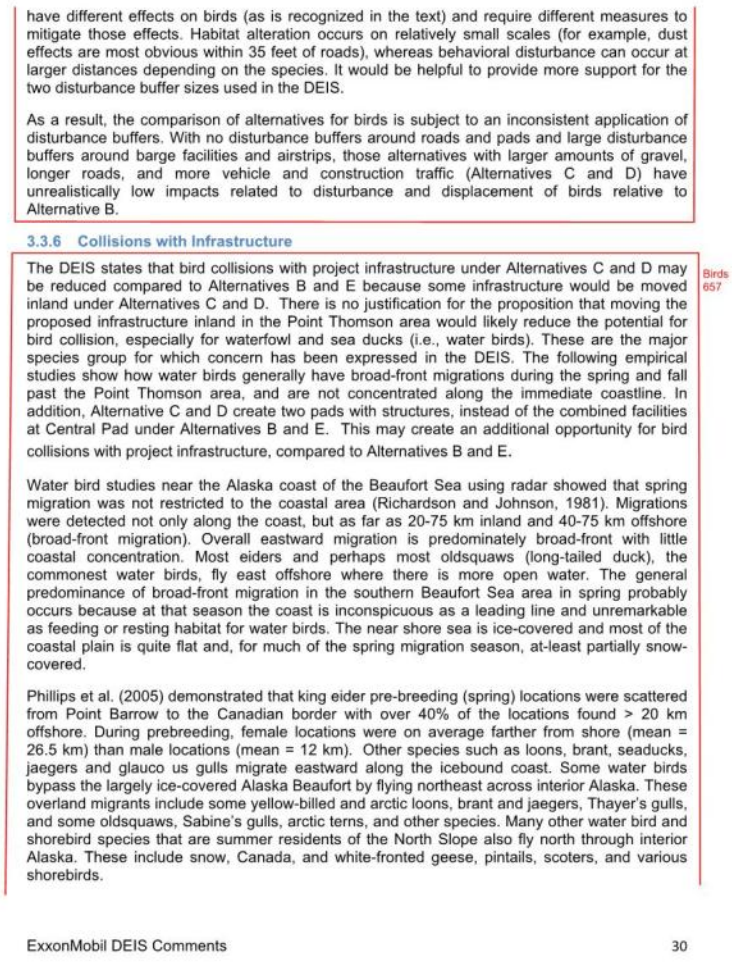
Comment	Response
	3446 The medium term duration is applied to all alternatives because water withdrawal would occur throughout the life of the project for all alternatives, which could have possible impacts to vegetation and wetlands. Due to the regulated nature of water removal activities, impacts from water withdrawal would be minor, possible, and limited for all alternatives. 650 The purpose of an EIS is to disclose the potential impacts of a project on the environment. Discussing possible environmental impacts, followed by why those impacts are unlikely to occur as a result of the proposed project (or alternative) is appropriate and is done throughout Chapter 5. As noted in this comment, the EIS presents the permit stipulations currently placed on projects to minimize impacts to tundra from tundra travel and analyzes impacts based on the implementation of the permit stipulations. Potential impacts from tundra travel for each alternative were based on information provided to the Corps in a practicability report provided by the Applicant. The practicability report provided comparable information about how the Applicant would construct, drill, and operate under each of the proposed alternatives. In the report, the Applicant estimated tundra travel for each of the Alternatives as follows: Alternative B: 377 to 427 tundra travel trips during construction and drilling; Alternative C: 587 to 687 tundra travel trips during construction and drilling; Alternative D: 682 to 807 tundra travel trips during construction, drilling, and operations; Alternative E: 557 to 647 tundra travel trips during construction and drilling. The practicability report did not alert the Corps to the likely need for tundra travel to occur during time periods or conditions in conflict with current permit stipulations, except for emergency situations under Alternative E. The Corps did, however, anticipate that under Alternative E some tundra travel during summer may be needed in case of emergency or other unusual situations, because of the lack of gravel roads to the East and West Pads.

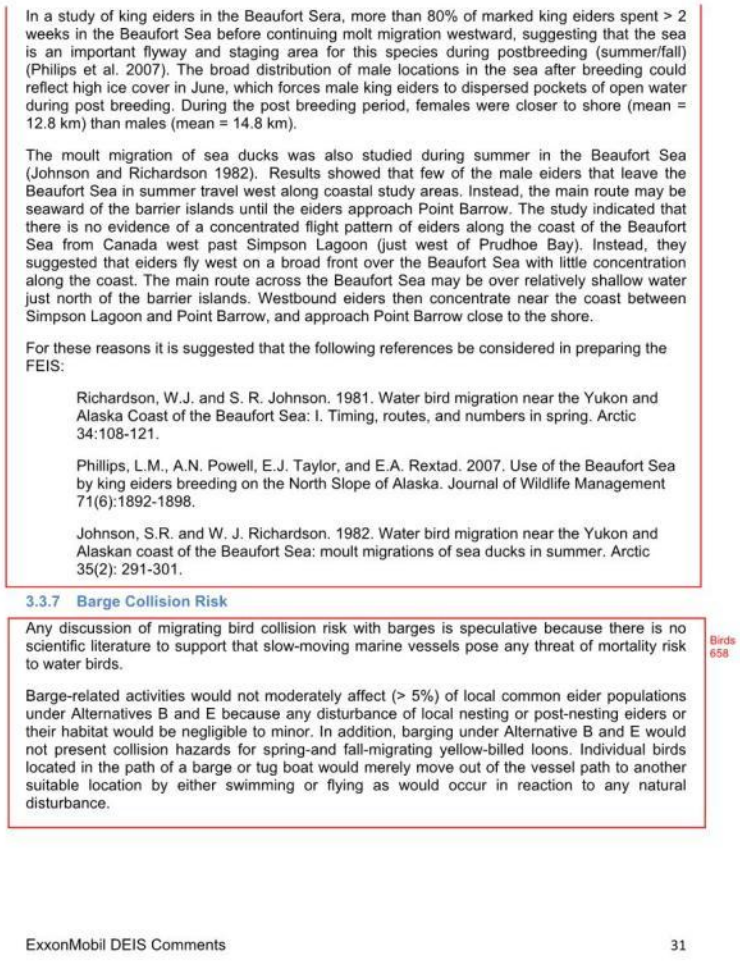
Comment	Response
	651 As noted in this comment, a review of aerial photography over time indicates that the shoreline is changing where dredge disposal is proposed under Alternatives B and E. The shoreline also may change between the most currently available aerial photography and the time when dredged materials would be disposed if dredging is approved by the Corps. If dredging is approved, the final location for dredge disposal should be determined in consultation with the Corps during final permitting. 652 The Corps has considered the commenter's recommendation for improvements to the impact criteria and has made the decision not to incorporate the recommendations in the Final EIS. The Corps and cooperating agencies developed and agreed to the framework and general methodology for impact criteria (see Chapter 4), which provides a solid framework for analyzing impacts to the environment. The resource-specific impact criteria definitions presented in Chapter 5 are based on scientific literature and the best professional judgment of the Corps, cooperating agencies, and third-party EIS contractor subject matter experts. The definitions allow for analyses based on quantitative data, where available, and qualitative information and best professional judgment where quantitative data were unavailable. Long-term habitat loss/alteration due to gravel extraction or placement was differentiated in the analyses from temporary habitat loss and medium-term habitat alteration that results from tundra ice roads (see Table 5.9-4 on page 5-212 of the Draft EIS and related discussion as an example). To the extent possible, given available research, impacts related to disturbance (air, barge, tundra traffic) were differentiated from habitat impacts in the EIS (see Tables 5.9-3, 5.9-4, and 5.9-6 and related discussions as examples).

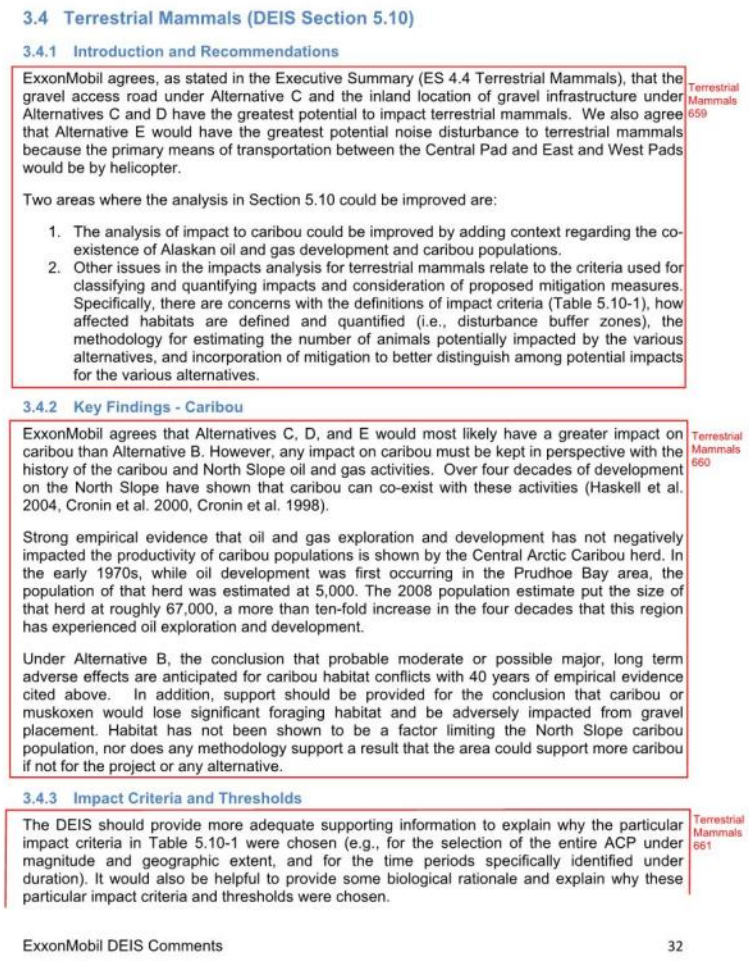
Comment	Response
 3.3.2 Impact Thresholds and Bird Project Area The protocol for determining overall levels of impacts needs to be more fully explained. Although four categories of impacts are listed, only magnitude is discussed in all text sections, the remaining three are discussed inconsistently so that it is not clear how each species group could be categorized for each type of impact. We suggest that the *No Effect* threshold of potentially affecting <1% of a local bird population or < 0.1% of an ACP population be listed as *Negligible*, consistent with our general recommendation on impact criteria. Birds 653 The impact assessments in the DEIS could be strengthened by providing some biological rationale for the impact parameters chosen. For example, for impact-magnitude thresholds, it would help to describe how ≥25% of a local population or ≥5% of an ACP population were chosen as the affect thresholds for impacts to be assessed as major in magnitude. Providing similar biological reasoning for how the affect thresholds were selected to separate moderate and minor impact magnitudes would be helpful. Additionally, it would help to provide some biological rationale to indicate why the area within a 2.5-mile buffer surrounding the proposed project infrastructure was selected as the bird project area in which to assess impacts. The size of the impact assessment area is one of the most important elements in an impact analysis, and it plays an even more important role when quantitative impact analyses are conducted; hence it is critical to provide an explanation of the basis for the size of the bird project impact area in the DEIS. Surf Scoters are listed as having moderate impacts under Alternative E because 23 breeding birds could be displaced (0.7% of the ACP population, which is above the threshold set for moderate impacts). However, there are no definitive nesting records of Surf Scoters along the Alaska portion of the Beaufort Sea; in the Beaufort Sea area, this species is a common nester only in the Mackenzie Delta in Canada (Johnson and Herter 1989). Hence the estimated number of breeding Surf Scoters in the project area undoubtedly is incorrect because the species is not known to nest there. Curiously, the DEIS recognizes (in Chapter 3; see Table 3.9-2 on p. 3-91) that Surf Scoters occur only as non-breeders on the ACP. The population estimates for Common Eider must be inaccurate because more birds are listed for the local Point Thomson post-breeding population than are estimated to occur across the enitre ACP. This is impossible unless a large number of Common Eiders move into the Point Thomson area from the Canadian Arctic following breeding, and that somehow those additional birds were not accounted for in the population estimate for the ACP. The DEIS lists a population estimate of <50,000 Red Knots on the ACP, but this species is quite rare in Alaska. Johnson and Herter (1989) indicate that only small groups or single birds have been recorded on the ACP; the species breeds sparingly in the Point Barrow area and in mountains in northwestern Alaska. The population estimate of <50,000 birds appears to be the estimate for the entire North American continent (the species is far more common in the Canadian Arctic), as reported in ASG (2008), although this reference is not listed in the sources for population estimates for birds reported in Chapter 3 (see Table 3.9-2 on p. 3-91). 3.3.3 Equating Displacement and Disturbance with Population Loss Overstates Impacts Project impacts are, for some species, overstated in part due to the impact thresholds utilized. When impacts are determined to be of moderate magnitude for birds (e.g., Common Eider under Alternatives B and E, and Surf Scoter under Alternative E), the conclusions are based on the percentages of populations (above specific thresholds) in the Point Thomson area and/or the ACP that could be displaced by habitat loss, habitat alteration, and disturbance. What is not specified is what effect such displacement would have on the birds and the bird population(s) in Birds 654 ExxonMobil DEIS Comments 28	653 The Corps has considered commenter's recommendation for improvements to the impact criteria and has made the decision not to incorporate the recommendations in the Final EIS. The Corps and cooperating agencies developed and agreed to the framework and general methodology for impact criteria (see Chapter 4), which provides a solid framework for analyzing impacts to the environment. The resource-specific impact criteria definitions presented in Chapter are based on scientific literature and the best professional judgment of the Corps, cooperating agencies, and third-party EIS contractor subject matter experts. The definitions allow for analyses based on quantitative data, where available, and qualitative information and best professional judgment where quantitative data were unavailable. The Corps also believes that the impact categories of minor, moderate, and major are sufficient and will not be including a category of "negligible" in the Final EIS. Regarding the bird study area, the Corps determined that a 2.5-mile buffer provided both a conservative view of potential area of impacts for all alternatives collectively. It is understood that tundra roads and other features' locations could move slightly to avoid water bodies and other species-specific habitat features to minimize overall impacts. As noted in this comment, it is agreed that there are no definitive nesting records of surf scoters along the Alaska portion of the Beaufort Sea. One of the datasets used for the analysis of conservation birds of concern impacts (Dau and Bollinger 2009) is a breeding bird survey conducted by the USFWS, and the sightings of surf scoters were recorded during this survey. This dataset appears in a column of the analysis table described as "breeding birds." The Corps understands how this may appear misleading and has added a footnote to Tables 5.9-5, 5.9-9, 5.9-13, and 5.9-17 of the Final EIS to identify surf scoters in the analysis as non-breeding birds. Regarding the common eider population estimates, the difference between the local population estimate and the ACP-wide estimate is because the Point Thomson breeding estimate is based on densities calculated for the EIS from project-specific studies, whereas the ACP estimate is reported in referenced literature. Due to the higher concentration of common eiders within the lagoon area adjacent to proposed project infrastructure, multiplying this density out to the broader tundra area of impact, which is appropriate for other species, artificially inflated the results for common eiders. In order to maintain consistent methodology, the discrepancy has been identified in the footnotes of Tables 5.9-5, 5.9-9, 5.9-13, and 5.9-17 of the Final EIS rather than altering methods for one species of concern. Given the higher concentration of common eider in the lagoon area, which is causing the inflation of broader study area estimates, it remains relevant for the impact call to stay at "moderate." Based on the comment regarding the ACP population of red knots, the Corps reviewed Johnson & Herter (1989) and other relevant sources and agrees that the red knot is a rare species in the study area. Because it is difficult to provide an

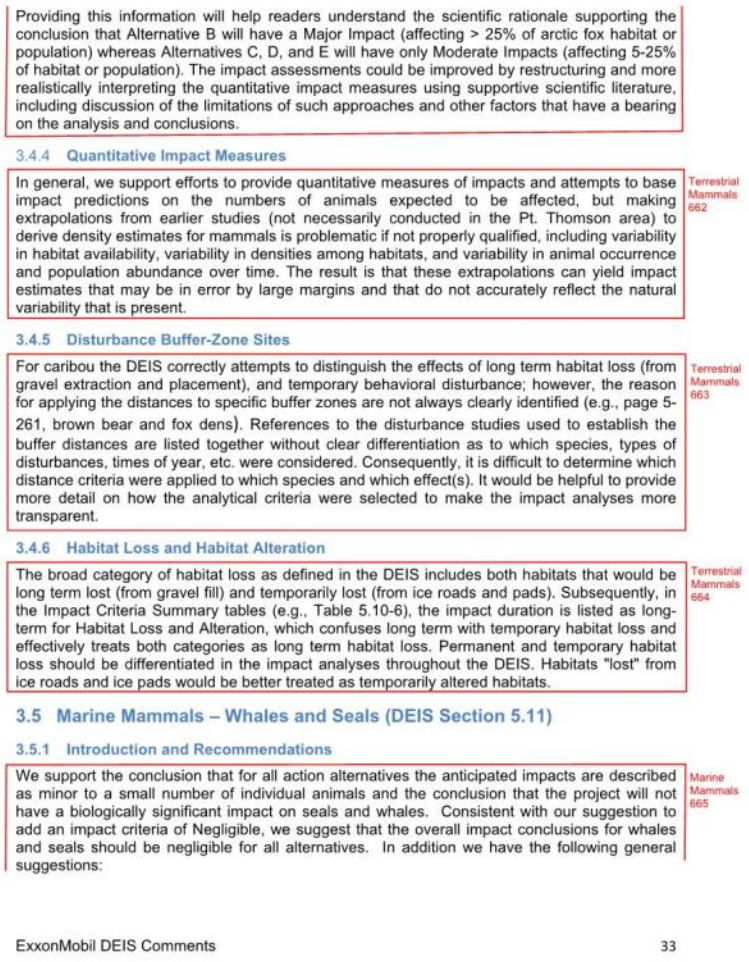
Comment	Response
	adequate ACP population estimate for the red knot, Tables 5.9-5, 5.9-9, 5.9-13, and 5.9-17 of the Final EIS were adjusted to show the ACP population estimate field without a numeric figure, as is the case for the other population estimates for the red knot. 654 The issues raised in this comment regarding bird displacement are discussed in paragraphs two and three of Draft EIS Section 5.9.3.1 under "Habitat Loss and Alteration." The section includes a discussion regarding availability of nesting habitat not being a limiting factor for distribution or abundance (TERA 2000) and notes that birds that may be displaced would likely nest in adjacent undisturbed habitats. Paragraph three continues with a discussion regarding the potential for birds to use altered habitats. See the response to Comment 653 for a discussion of the analysis regarding common eiders.

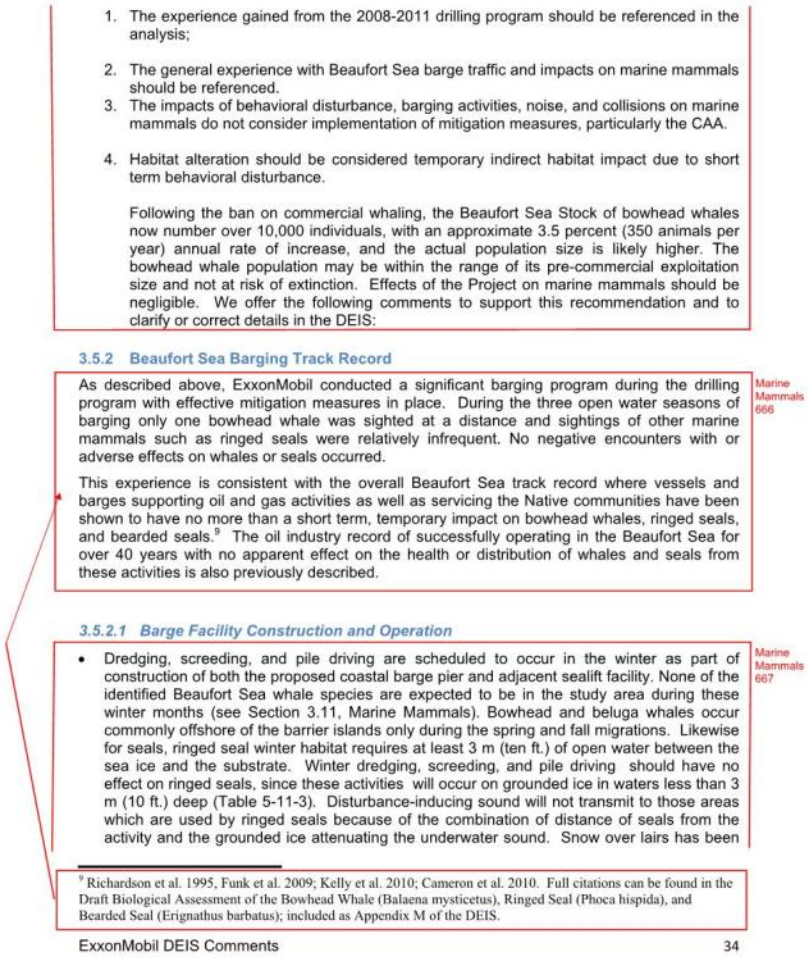
Comment	Response
	655 The analysis results for conservation birds of concern (Tables 5.9-5, 5.9-9, 5.9-13, and 5.9-17) were presented as a summary because providing the same level of detail for individual species as was done for the general bird analyses (Tables 5.9-4, 5.9-8, 5.9-12, and 5.9-16) would have been too large and complex for general EIS reader comprehension. Specific types of impacts (e.g., habitat alteration) are discussed in the EIS text where noteworthy, and the final summary of impacts (e.g., Section 5.9.3.5 and Table 5.9-6), includes bird species of concern that were determined to have moderate or greater impacts. 656 Section 5.9.1, Methodology, provides discussion and scientific references for each of the buffer zone types, including those for areas classified as habitat loss from gravel roads and pads (330-foot buffer) and habitat alteration from ice features (no buffer). As explained in the text, project features constructed from ice were not buffered because most of the construction and use would occur in winter when birds are not present, therefore minimizing disturbance to bird populations in the project area. As explained in the same section, the buffer for barge and air traffic was extended to a larger area due to farther reaching noise and visual disturbance, as well as the risk for bird strikes in inclement weather (as explained in the response to Comment 658 for barges, specifically). More detailed discussion of the effects of each type of disturbance – vessel traffic, air traffic, vehicle traffic – is provided in the impacts discussions for each alternative (e.g., Section 5.9.3.1, pp. 5-214 to 5-215 of the Draft EIS).

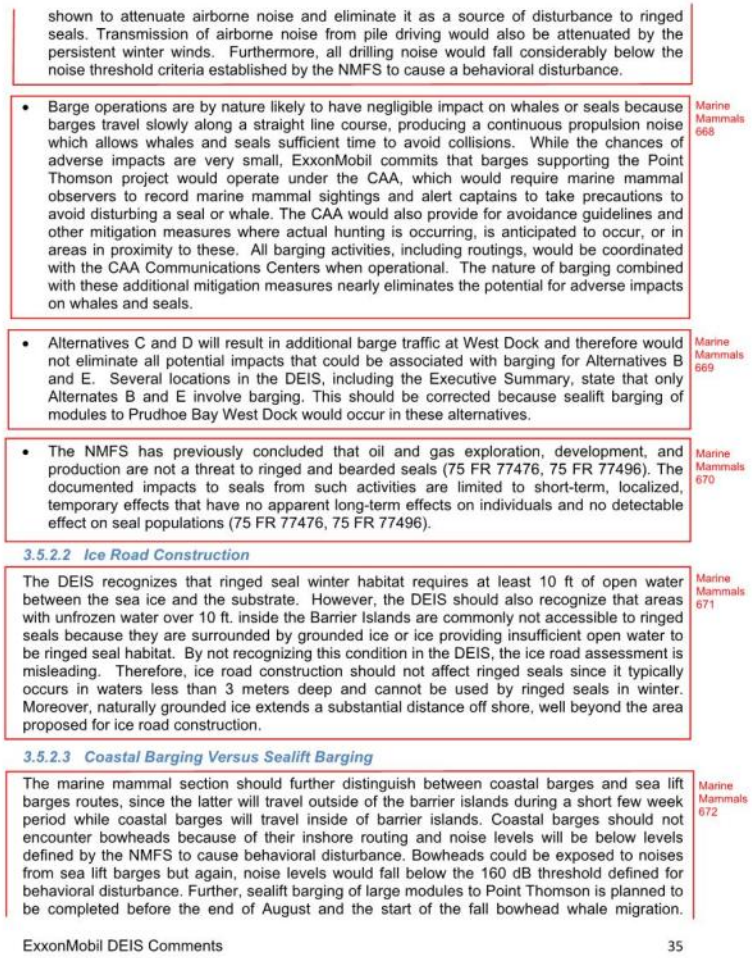
Comment	Response
	657 The Corps evaluated the references provided in this comment and additional references, and consulted with the U.S. Fish and Wildlife Service (USFWS) regarding the potential for bird collisions with project infrastructure. The USFWS has expressed concern about oil and gas infrastructure constructed in coastal locations because of past bird collision events that have occurred at Northstar and other North Slope infrastructure located on the coast compared to other infrastructure located inland from the coast. The discussion of infrastructure collision impacts was revised for clarification and includes acknowledgement of Applicant proposed mitigation to minimize impacts from bird collisions (downward shielded lighting).

Comment	Response
	658 The EIS does not discuss impacts associated with birds colliding with moving barges. The EIS analysis for bird collisions focuses on the potential for migrating birds to collide with lighted infrastructure during periods of inclement weather. The EIS analysis related to bird collisions with infrastructure does mention the minor possibility for sea ducks and loons flying along the coast during poor weather conditions to hit the barge bridge during offloading activities because of the flight behavior of these species. The EIS analysis of potential impacts to birds related to barges also discusses the potential for disturbance and/or displacement of breeding and post-breeding birds in marine and coastal areas, focusing on disturbance during molting and brood-rearing waterfowl concentrate in Lion Bay.

Comment	Response
	659 This comment summarizes more specific comments related to terrestrial mammals. See the responses to specific comments below (Comments 660 to 664). 660 Caribou population increases on the North Slope are discussed in Section 3.10.3.2 (Caribou). The studies referenced in this comment (and additional references) were used in developing the discussion of impacts to caribou. The analysis of impacts to caribou in the EIS focus on aspects of their life history known to be most sensitive to development: disturbance during calving, close proximity of roads and pipelines that may provide a barrier to movements, and individual pipelines that may become barriers to movements. The EIS does not suggest that caribou habitat is limiting in the study area and does not state that a "significant" amount of foraging habitat for caribou or muskoxen would be adversely impacted. Page 5-263 of the Draft EIS states: "While the amount of forage loss could support a considerable number of caribou or muskoxen, forage is plentiful in the surrounding areas and these animals would likely move to other areas to forage (Figure 5.10-2)." However, gravel fill does result in a long-term loss of habitat that can be measured and compared among alternatives. The EIS finds that impacts to caribou from the construction of Alternative B would be minor, long term, possible, and limited. The only major impact listed for Alternative B would be to arctic fox dens and/or den habitat because of the location of proposed gravel infrastructure relative to known den sites and/or potential den habitat. 661 The Corps has considered the commenter's recommendation for improvements to the impact criteria and has made the decision not to incorporate the recommendations in the Final EIS. The Corps and cooperating agencies developed and agreed to the framework and general methodology for impact criteria (see Chapter 4), which provides a solid framework for analyzing impacts to the environment. The resource-specific impact criteria definitions presented in Chapter 5 are based on scientific literature and the best professional judgment of the Corps, cooperating agencies, and third-party EIS contractor subject matter experts. The definitions allow for analyses based on quantitative data, where available, and qualitative information and best professional judgment where quantitative data were unavailable. The Corps also believes that the impact categories of minor, moderate, and major are sufficient and will not be including a category of "negligible" in the Final EIS.

Comment	Response
	662 Because this comment does not provide sufficient reference to a page, section, or species in the document, no changes have been made to the EIS. 663 For impact analysis methods with no references cited, no standardized impact buffers have been established in the literature. For these species, the subject matter expert evaluated available information for the species and/or other species that may have similar behavioral responses to establish a reasonable impact evaluation buffer for the analysis. For species that have established impact buffers, the literature used is clearly cited in the methods (see bullet list on pages 5-260 and 5-261 of the Draft EIS). The tables in the impact analyses for each alternative provide information on which impact assessment methods apply. 664 The differences in impacts associated with gravel and ice infrastructure are discussed in the text. The overall impacts were summarized in the tables at the end of each alternative discussion. The Corps reviewed the impact conclusions presented in the Draft EIS and determined that revising the impact summary tables would not change the overall impact evaluation for the alternatives and the development of the environmentally preferred alternative. Therefore, no changes were made to the document as a result of this comment. 665 This comment summarizes more specific comments related to marine mammals. See responses to the specific comments below (Comments 666-674).

Comment	Response
	666 The purpose of an EIS is to disclose the potential impacts of a project. The Draft EIS for this project disclosed the potential impacts to marine mammals and determined that for whales and seals, barging activities would have the following impacts related to barging activities: whale disturbance—minor, temporary, possible, local; whale vessel collision—minor, temporary, possible, limited; seal disturbance—minor, medium term, possible, limited; and seal vessel collision—minor, temporary, unlikely, and limited. Summarizing these conclusions, the Corps believes that the potential impacts to marine mammals from barging activities associated with the proposed project would be minimal. 667 The marine mammal section of the EIS recognizes that dredging, screeding, and pile driving are scheduled to occur during winter. The marine mammal impact assessment also evaluates additional small amounts of dredging and screeding that could occur during the open water season in advance of barging, as this is included in the Applicant's proposed project. The EIS states that whales would not be present during winter construction activities and that winter construction activities are unlikely to impact seals. The EIS states that distance and grounded ice would attenuate underwater sound and snow over seal lairs would attenuate airborne noise. However, there are no studies regarding the attenuation of pile driving noise by wind and there are no data proving that drilling noise would always be below NMFS thresholds. Overall, the EIS concludes that the impacts to whales and seals from construction activities would be minimal.

Comment	Response
	668 The Draft EIS acknowledged that the Applicant has committed to operating under the Conflict Avoidance Agreement and included this and other mitigative measures in the evaluation of impacts to marine mammals. Summarizing the conclusion in the Draft EIS, the Corps found that the potential impacts to marine mammals from barging activities associated with the proposed project would be minimal. 669 The study area for the marine mammal direct and indirect impact analysis did not include West Dock or the marine environment west of West Dock because barging activities currently occur there. 670 The conclusions in the EIS agree with NMFS general conclusions about oil and gas activities. The magnitude of impacts for seals was found to be minor, the duration of impacts was found to be temporary to medium term, the probability of impacts was found to be unlikely to possible, and the geographic extent of impacts was found to be limited to local. 671 Page 5-329 of the Draft EIS states: "As proposed, none of the Alternative B sea ice road footprint would effect suitable ringed seal lair habitat as ice roads require grounded ice (shorefast ice that freezes to the seafloor due to shallow depths of under 10 feet deep) for stability, and ringed seals do not use grounded ice areas." The overall finding for seal habitat loss (where ice roads were discussed) is minor, medium term, possible, and limited. 672 The EIS distinguishes between coastal and sea lift barge routes (see page 5-333 of the Draft EIS) and provides a figure showing the Applicant's proposed routes (see Figure 3-17-4 on page 3-241 of the Draft EIS). In the discussion of potential barging impacts, the EIS states: "However, barging would occur in areas and periods of relatively low marine mammal densities. For example, during July, most bowhead and beluga whales are foraging east or northeast of the study area, and ringed seals tend to occur farther offshore, near the pack ice edge. … Thus, possible disturbance effects would be limited to a minor number of individuals in a limited area, most likely ringed seals and possibly small numbers of bowhead and beluga whales during the fall migration." The EIS includes discussion of the Applicant's compliance with the Conflict Avoidance Agreement and other proposed mitigation measures associated with barging activities. The overall finding for habitat disturbance from the Applicant's proposed project on whales was minor, temporary, possible, and local.

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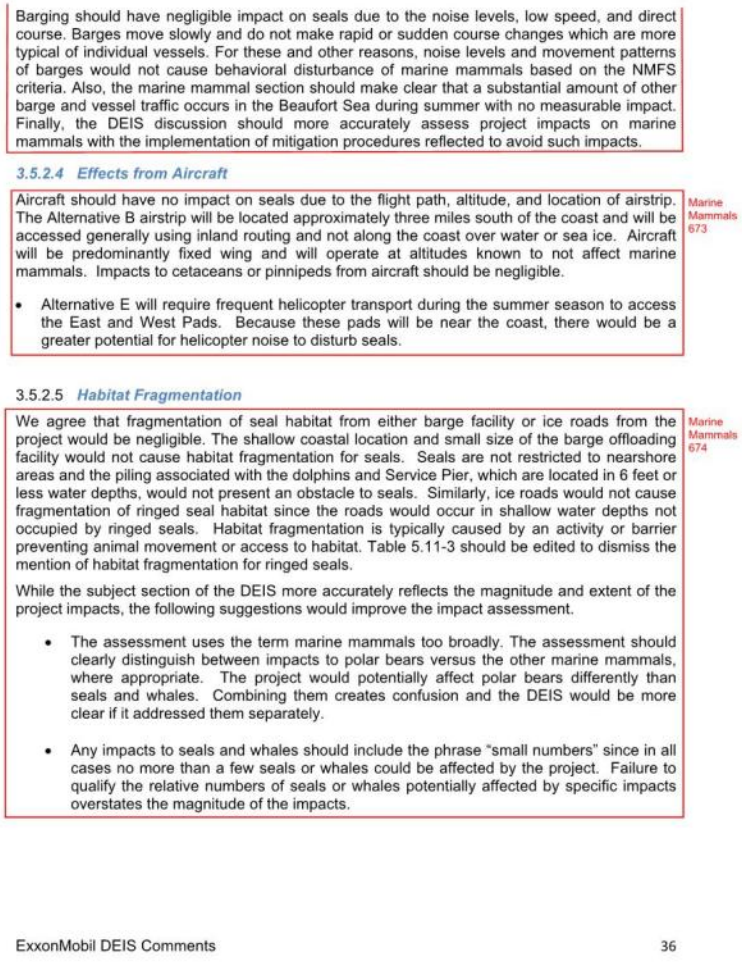	673 The EIS discloses the potential impacts that could occur to seals by aircraft in general. The paragraph on impacts to seals concludes the following: "Overflights at low altitudes may cause some animals to alter their behavior (i.e., dive or enter water if hauled out), but are very unlikely to have long-lasting or biologically important effects (Richardson et al. 1995)." 674 Table 5.11-3 was edited for the Final EIS to state that habitat fragmentation impacts from the ice road would be unlikely, which is consistent with the impact finding in Table 5.11-4. The impact assessment for marine mammals provides separate evaluations and discussions for whales, seals, and polar bears because project features would affect each of these species groups differently. The summary tables at the end of each alternative discussion clearly separate the species groups. Where appropriate, the EIS states that impacts could or would occur to "small numbers" of animals.

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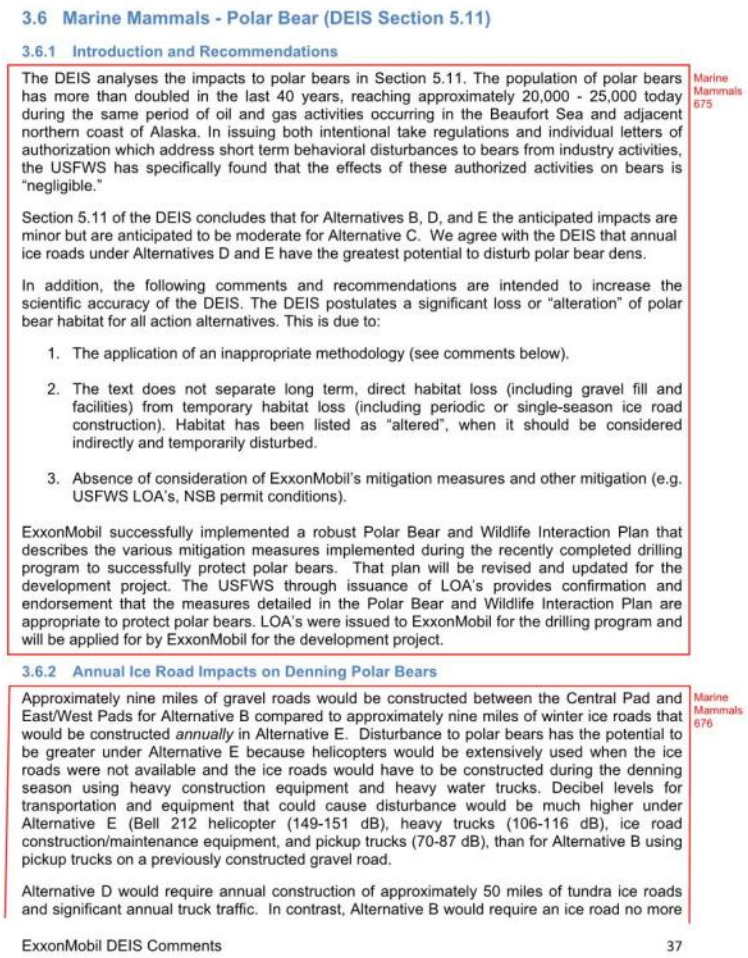	675 This comment summarizes more specific comments related to polar bears. See responses to the specific comments below (Comments 676-680 and 741). 676 The Corps agrees that a discussion of impacts from annual ice road construction in Alternatives D and E is missing from the Draft EIS. These discussions have been added to Sections 5.11.5, Alternative D: Inland Pads with Seasonal Ice Access Road, and 5.11.6, Alternative E: Coastal Pads with Seasonal Ice Roads and Airstrip, in the Final EIS.

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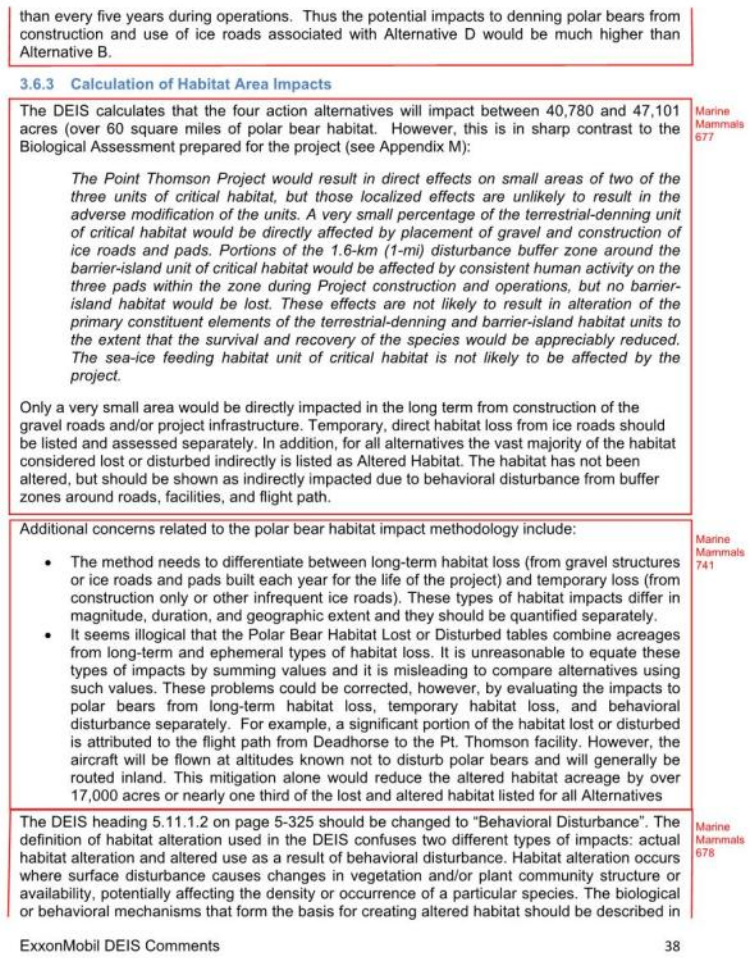
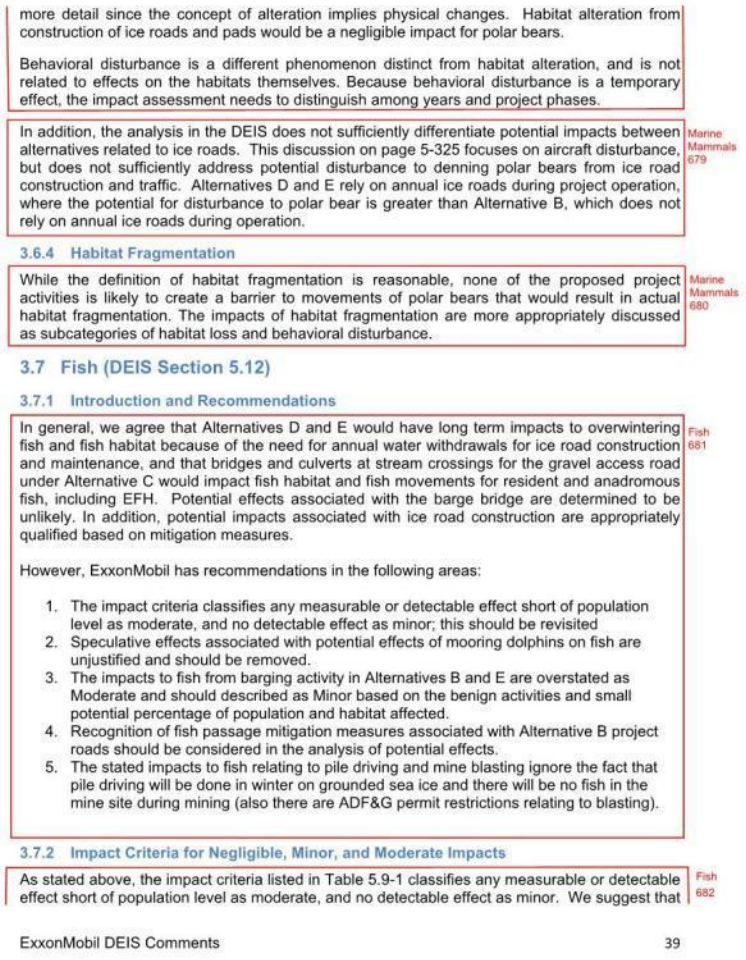
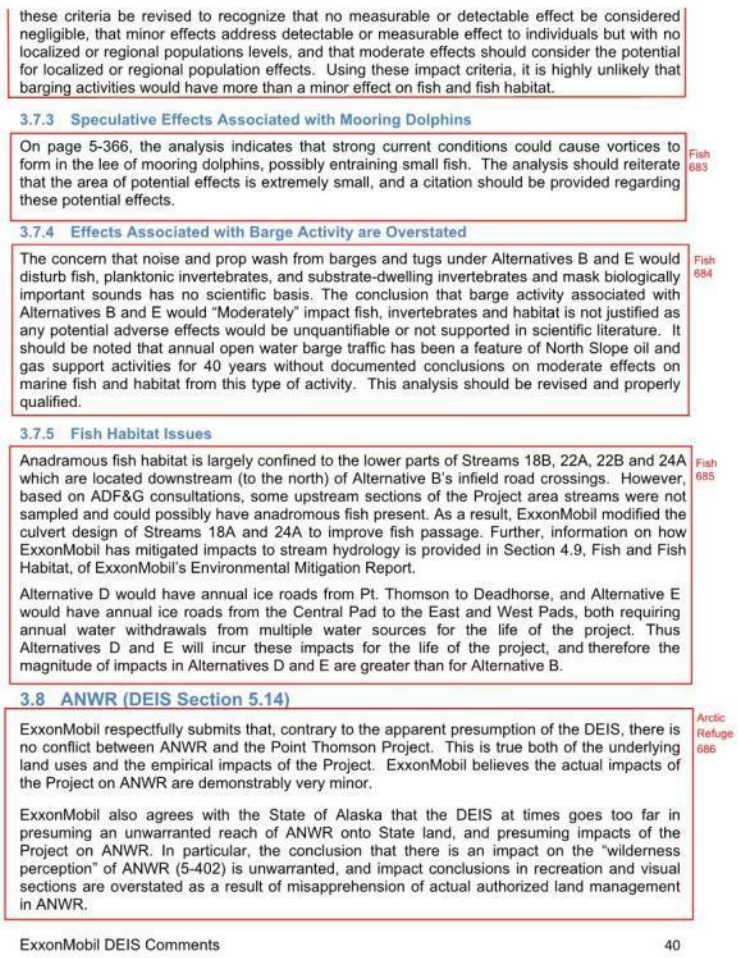
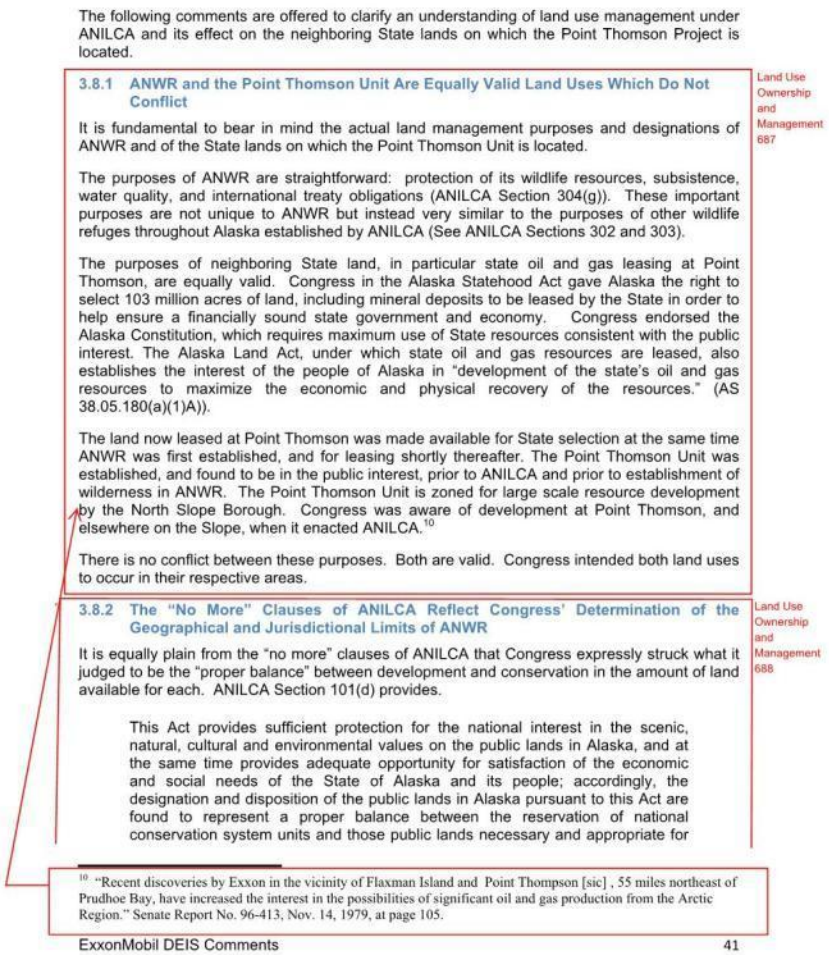
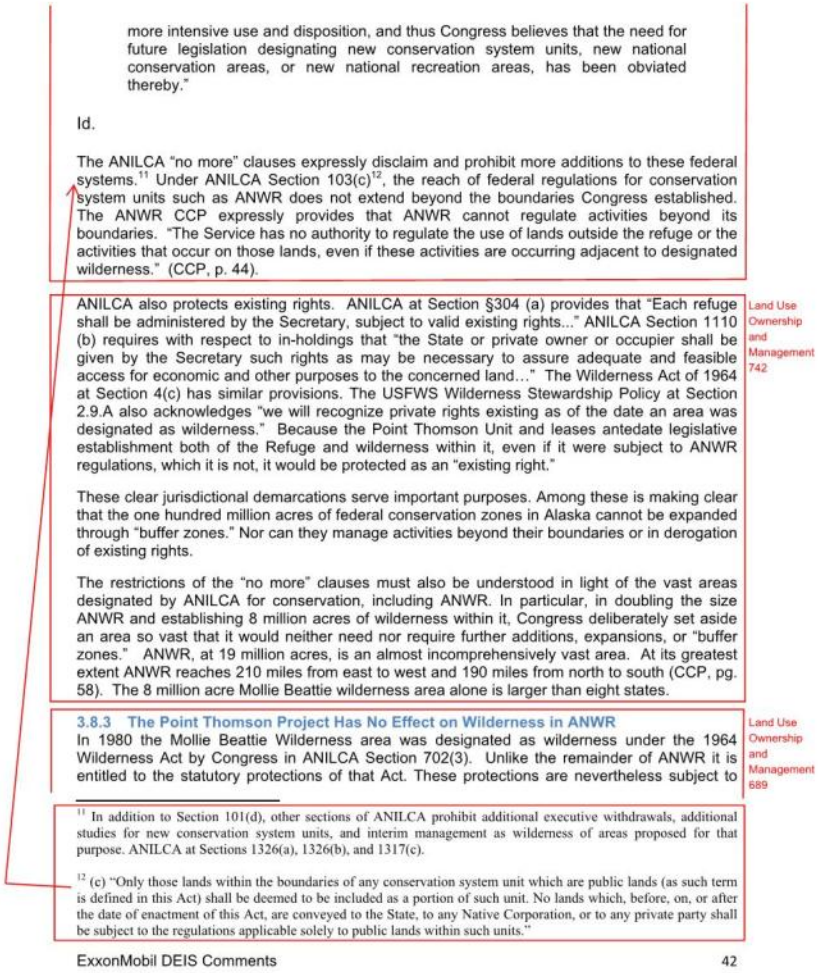
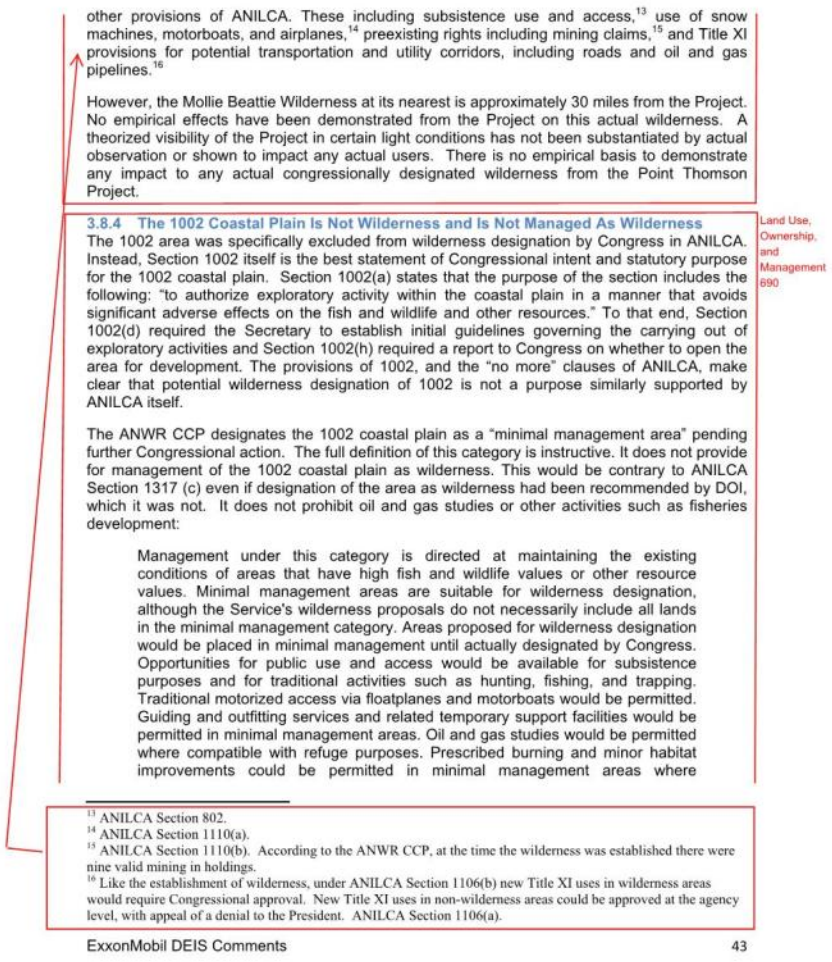
	677 In the Draft EIS and the Biological Assessments (BAs) for Endangered Species Act (ESA), listed or candidate species were prepared for different federal review processes following different federal guidelines. The EIS evaluates a range of reasonable alternatives while the BAs focus on the Applicant's proposed alternative (Alternative B in the EIS). Therefore, it is not surprising that the analyses do not match precisely. The EIS and BAs serve different purposes (NEPA compliance for the EIS, and ESA compliance for the BAs). The analyses conducted for each document are valid for their purposes and the conclusions reached by the analyses in the EIS and BAs are the same. Different analyses reaching the same conclusions strengthen those conclusions. 741 Tables 5.11-2, 5.11-5, 5.11-8, and 5.11-11 were revised in the Final EIS to evaluate gravel and ice infrastructure separately and to remove the total rows. The total rows were not used in the impact analysis. The marine mammal impact analysis in the Draft EIS considered that overflights between Deadhorse and Point Thomson would most often fly at an altitude and inland flight path to avoid impacts to polar bears and other marine mammals. The analysis was conservative, however, evaluating the potential for weather constraints that would force aircraft to fly low and along the coast. Section 5.12 of the Final EIS was revised to make this point more clear. The impact summary tables at the end of each alternative in Section 5.11 of the Final EIS have been expanded to evaluate potential impacts to polar bears as follows: habitat loss (gravel), habitat loss/alteration (ice roads), alteration (disturbance-overflights), alteration (disturbance-permanent facilities), alteration (disturbance-ice roads), habitat fragmentation, land/ice vehicle collision injury/mortality, and altered survival/productivity. 678 The Corps agrees that the discussion of marine mammal impacts listed under the heading "Habitat Alteration (Disturbance)" may be confusing to the reader. Because this analysis is focused on behavioral disturbance and displacement rather than changes to marine mammal habitat, the heading has been changed to "Behavioral Disturbance and Displacement" in the Final EIS.

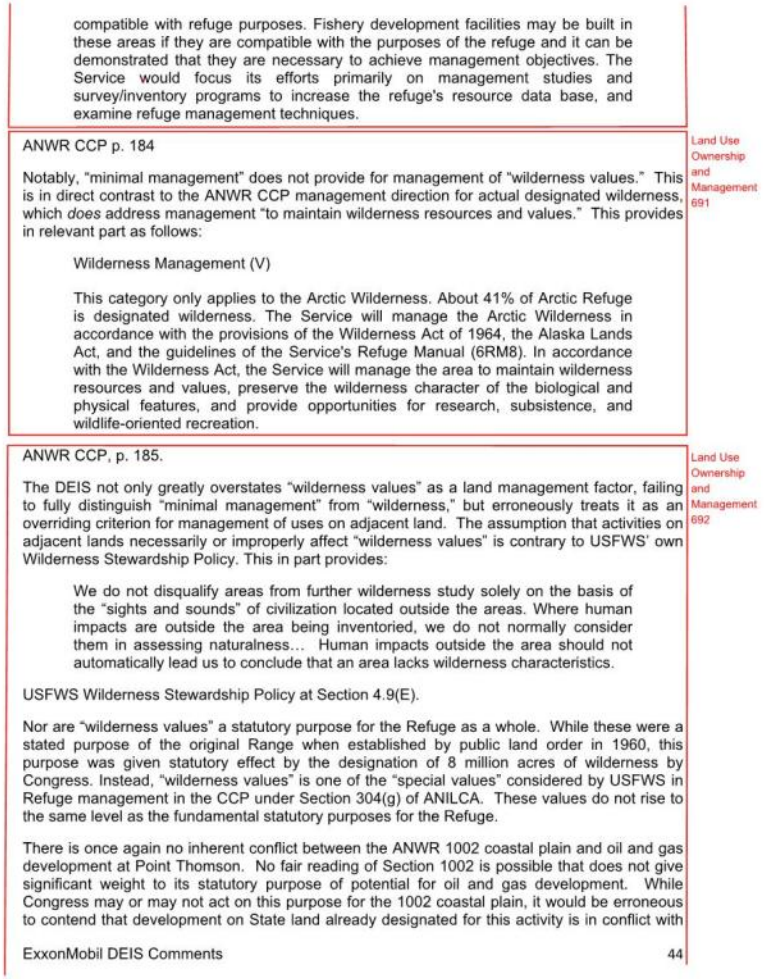
Comment	Response
	679 The methods presented in Section 5.11.1.2, Behavioral Disturbance and Displacement, were revised to clarify that analyses include ice road construction and use and gravel road construction and use. The discussion of impacts associated with ice road construction and use and helicopter disturbance were expanded, particularly for Alternatives D and E (Sections 5.11.5 and 5.11.6), which rely on annual ice roads during operations. 680 The Corps agrees that the potential impacts to marine mammals from habitat fragmentation are small. This is reflected in the analysis presented in the EIS. 681 This comment summarizes more specific comments related to fish. See responses to the specific comments below (Comments 682, 683, 684, and 685). 682 The Corps has considered the commenter's recommendation for improvements to the impact criteria and has made the decision not to incorporate the recommendations in the Final EIS. The Corps and cooperating agencies developed and agreed to the framework and general methodology for impact criteria (see Chapter 4), which provides a solid framework for analyzing impacts to the environment. The resource-specific impact criteria definitions presented in Chapter 5 are based on scientific literature and the best professional judgment of the Corps, cooperating agencies, and third-party EIS contractor subject matter experts. The definitions allow for analyses based on quantitative data, where available, and qualitative information and best professional judgment where quantitative data were unavailable. The Corps also believes that the impact categories of minor, moderate, and major are sufficient and will not be including a category of "negligible" in the Final EIS.

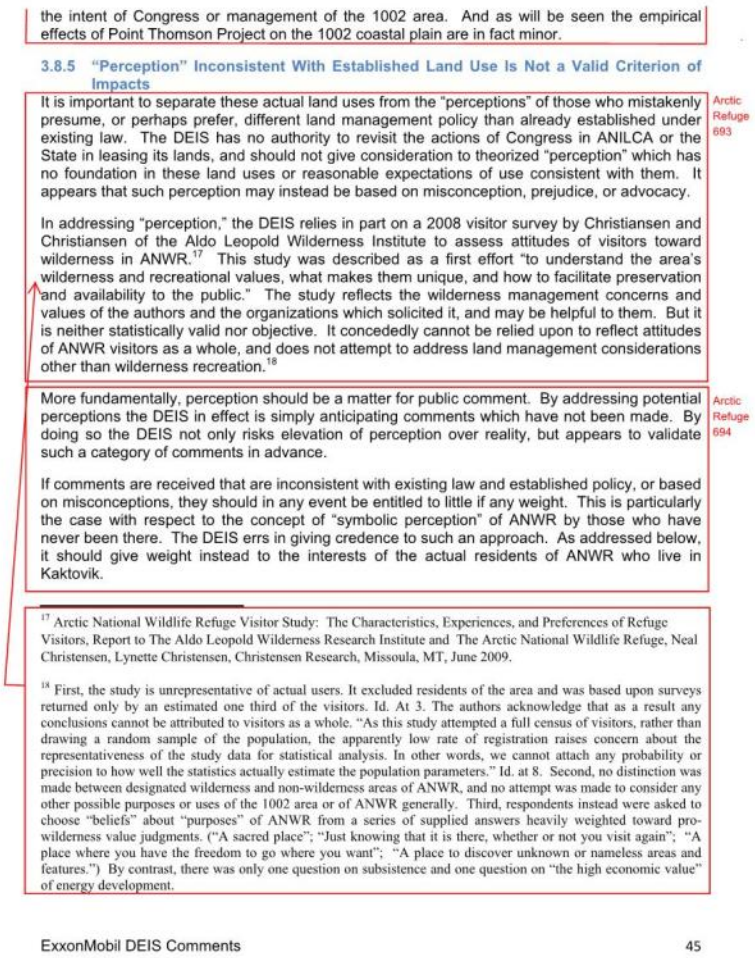
Comment	Response
	683 The Corps agrees that the potential impacts from fish entrainment associated with mooring dolphins would be small. The impacts are disclosed in the Draft EIS because of fish species migrating along the coast that are subject to prevalent winds and currents. The referenced sentence has been revised in the Final EIS to note that the possible entrainment area is small. 684 The Corps reviewed the Draft EIS paragraph referenced in this comment (Section 5.12.3.1, page 5-364 under "Vessel Traffic"), the impact findings relative to this topic (Section 5.12.3.2, Table 5.12-2 on page 5-368), and the impact criteria definitions for impacts to fish and invertebrates (Section 5.12.1, Table 5.12-1 on page 5-358) and has determined that the text and findings are appropriate. The definition for a moderate impact to fish and invertebrates is: "Impact would be measureable but would not affect normal fish/invertebrate movement, or would have the potential to impact individual fish/invertebrate survival or reproductive success, but population-level effects not expected." Invertebrates in or on the substrate could be directly impacted by grounding barges at the sea lift bulkhead and coastal barge service pier. Fish, particularly small fish that migrate along the coast, and planktonic invertebrates could be affected by prop wash, particularly associated with tug movement at Point Thomson because these organisms are to varying degrees dependent on currents for their motility. 685 The culvert design presented in this comment for fish streams is presented in Section 5.12, Fish, Essential Fish Habitat, and Invertebrates. The Applicant's mitigative measures to accommodate fish passage are presented in Section 5.12.7, Environmental Commitments. The varying impacts of each of the alternatives are evaluated throughout Section 5.12. 686 See response to Comment 618. Regarding: "reach of ANWR onto State land," the EIS intent is to disclose impacts, including impacts associated with proximity of the project to the refuge. This does not mean that refuge management in any way extends onto state land. The EIS states that the project would be visible and audible from the refuge, and that these sensory perceptions would have an effect on human use and perception of the refuge. Regarding the comment that impact on “wilderness perception” is unwarranted, p. 5-401 of the Draft EIS explains why a conclusion that there would be an impact is warranted. Other comment letters also indicate such impacts are perceived by a segment of the population.

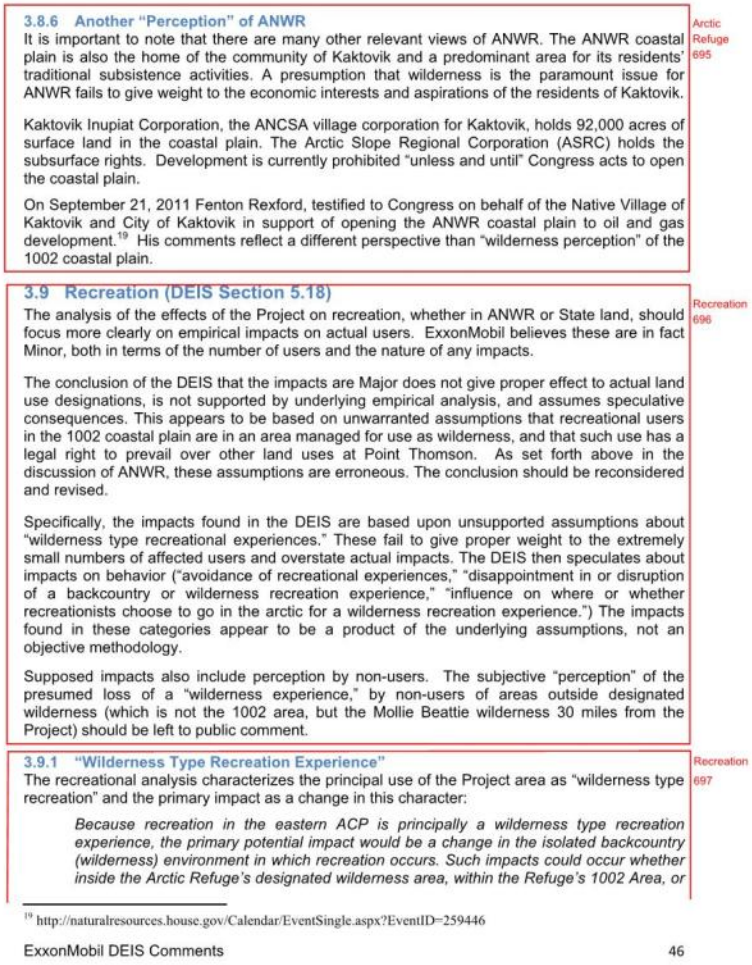
Comment	Response
	687 The EIS indicates that the proposed development of Point Thomson would be on state land managed for oil and gas development. It is the purpose of the EIS to disclose impacts of the proposed development. The EIS reflects the intent of the State and the Applicant to develop these lands, and it reflects the impacts that would occur. The occurrence of impacts is not meant to imply that the development cannot proceed or that the management intent for such development is not valid. 688 The EIS acknowledges that Arctic Refuge management authority does not extend beyond refuge borders. The job of the EIS is to disclose impacts, and impacts would occur based on the proximity of the project to the refuge. Disclosing that the project would be seen and heard from the far northwestern corner of the refuge is not meant to imply that the Arctic Refuge or its management authority would in some way be expanded westward as a result of the project.

Comment	Response
	742 The EIS does not state or imply that the Arctic Refuge would be expanded or that USFWS management authority extends outside refuge boundaries. The intent of the EIS is to disclose impacts (see response to Comment). Disclosure of impacts does not suggest that buffer zones should be established or that the project cannot move forward as planned. 689 The EIS does not indicate any substantial impact to the Mollie Beattie Wilderness in the Arctic Refuge section, and the Mollie Beattie Wilderness area is not a heading in the refuge impact table, Table 5.14-2. The Visual Aesthetics section (5.19) indicates the project likely would be invisible to the naked eye from the Mollie Beattie Wilderness area, even under ideal viewing conditions in daylight, but that lights likely would be visible. This is based on empirical evidence of (a) project personnel easily viewing lights from the greater Prudhoe Bay area at a distance of 60 miles as soon as a helicopter left the ground (i.e., as soon as it was possible to "see over" the curvature of the earth), and (b) digital modeling to indicate areas within view of the project site, including the Mollie Beattie Wilderness area, and (c) known higher use areas for recreation, such as the Sadlerochit Mountains within the Mollie Beattie Wilderness area. The Mollie Beattie Wilderness is not presented in the impact analysis table (Table 5.19-3) and figures only tangentially in the discussion at all (e.g., "Nighttime lighting of pads would create strong contrasts over long distances in an area without manmade lights").

Comment	Response
	690 EIS text has been updated in several sections to more clearly differentiate between federally designated wilderness areas (using "Mollie Beattie Wilderness" or "designated wilderness") and wilderness as defined in the dictionary (using "nondesignated wilderness" or "wilderness qualities and values"). The full text of the "minimal management" paragraph from the 1988 CCP has been added to the EIS, followed by two sentences that explain that certain activities cited in the minimal management category do not currently occur in the portion of the refuge nearest to Point Thomson and that a bird camp is established annually for research. See also the response to State of Alaska Comment 336 in Comment Document 105. The CCP definition of "minimal management" states that management "is directed at maintaining the existing conditions of areas that have high fish and wildlife values or other resource values." "Other resource values" may include wilderness values and associated scenic and recreation values.

Comment	Response
	691 See response to Comment 690. 692 Regarding wilderness values versus designated wilderness, see response to Comment 690. Regarding statutory purposes of the refuge, information regarding applicability of the original Range purposes came from Refuge staff. This has been clarified and two staff citations added. See also the response to State of Alaska Comment 335 in Comment Document 105. Regarding conflict between the 1002 Area and oil and gas development at Point Thomson, see the responses to Comments 686 and 687.

Comment	Response
	693 The discussion of "perception" in the EIS is not meant to suggest that "because wilderness is perceived, wilderness exists." The EIS is meant to accurately characterize wilderness qualities and values in the study area on both state land and Arctic Refuge land. Public perception of those who see the Arctic Refuge as a symbolic area does not appear to be at odds with actual current management of those portions of the refuge nearest to the project site. EIS documents typically rely on existing data. A note has been added to qualify the data from this study. The Corps will consider the issue of perception of wilderness qualities and values within the context of land management (e.g., Comment 687);namely, that Arctic Refuge lands and state lands are managed differently, both are valid management approaches, and the project is proposed to occur on state land managed for oil and gas development. The EIS properly discloses impacts for consideration by decision makers and the public. However, because, the impacts disclosed are unlikely to carry substantial weight in a permit decision, a time- and cost-intensive new survey or study does not appear warranted. 694 The EIS is meant to respond to comments made in scoping and in response to the draft document, and such comments do indicate that some among the public value the Arctic Refuge and the 1002 Area's wilderness qualities and values. The issue of perception is important because of the remote nature of the refuge from most of the nation's population and its relatively high prominence--meaning that many appear to value it for its existing status and management even if they never expect to visit. This also is an issue of impact to opportunity, and is relevant in cases of impact to wilderness-type recreation opportunity, which is the most common recreation in the study area. This type of recreation is at the far end of the spectrum of recreation types and is easily impacted, e.g., relatively small changes to the environment begin to reduce the ability to have a "wilderness type experience." Because perception of the refuge appears to be aligned reasonably well with actual conditions and actual management, it is appropriate to discuss such impacts in the EIS. See also the response to Comment 693.

Comment	Response
	695 The EIS in section 3.14.4, The Arctic Refuge's National Values, explains the various national values and views of the 1002 Area. The national interests for oil and gas development, while a high interest, are not what the refuge is currently managed for or how it is actually used today. In Chapter 5, the EIS discloses impacts to the refuge as it currently exists and is managed. 696 As stated in 5.18.8, Impacts for Action Alternatives: "this assessment is based on impacts to recreationists regardless of management of the land." The land use/land management section of the EIS does not indicate any impact to management related to recreation on either state or federal land. Land use/land management impacts overall are listed as minor to moderate. The EIS discloses impacts to uses that actually occur and to existing opportunity for such uses. On both state and refuge land, such uses currently do occur and are provided for in state and federal management of the lands. 697 The EIS states that a wilderness-type recreation experience is the type that occurs, not that such experience is a prerequisite for possible recreation in the area. The EIS acknowledges other tourists or recreationists who may fly over or land, or traverse the area by boat from Kaktovik or cruise ship farther offshore, for example. The EIS indicates such people would rarely stay in the project area. Because there are no lodgings, trails, roads, or other facilities, including designated camp sites, and because the land is principally in a natural state, the experience is, in fact, a "wilderness-type" recreation experience. The EIS language in the recreation section and Arctic Refuge section has been altered to better distinguish between designated and nondesignated wilderness to help explain that wilderness qualities and values exist outside the Mollie Beattie Wilderness area (and outside the refuge) and that a "wilderness-type" recreation experience does not depend on land being designated as part of the National Wilderness Preservation System.

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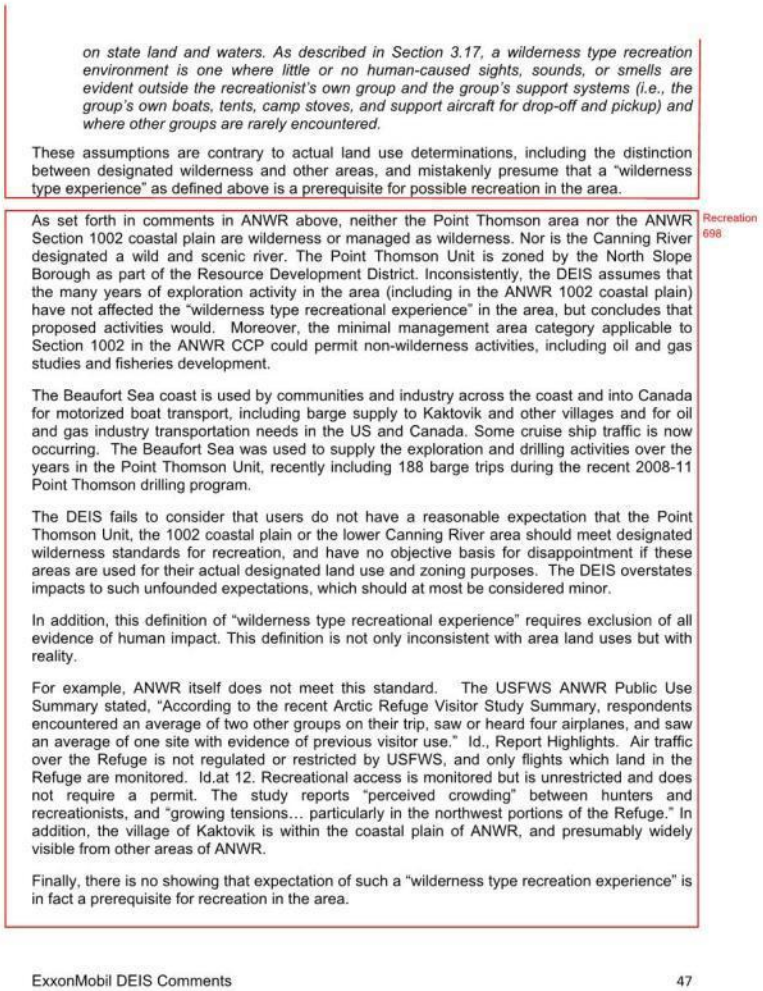	698 Regarding the first paragraph of this comment, per the USFWS, the areas of the refuge under Minimal Management are managed in part for their wilderness qualities and values. The distinction between past exploration activities and proposed oil and gas production activities is permanence; the past activities created temporary impacts, while the proposed project would be the first production project, a project that would be effectively permanent. In a Minimal Management area, the USFWS could permit oil and gas studies and fisheries development, but such use currently does not occur. The EIS evaluates current circumstances and what actually occurs. Regarding the other paragraphs of this comment, users historically have had a reasonable expectation for encountering very little "non-wilderness" activity in the primary study area, with the possible exception of distant barges or high overflights, because industrial activities have occurred temporarily, in winter, and often with many years between events, and because the State of Alaska limits motorized use of snowmobiles and ATVs. Regarding the prerequisite comment, see the response to Comment 697.

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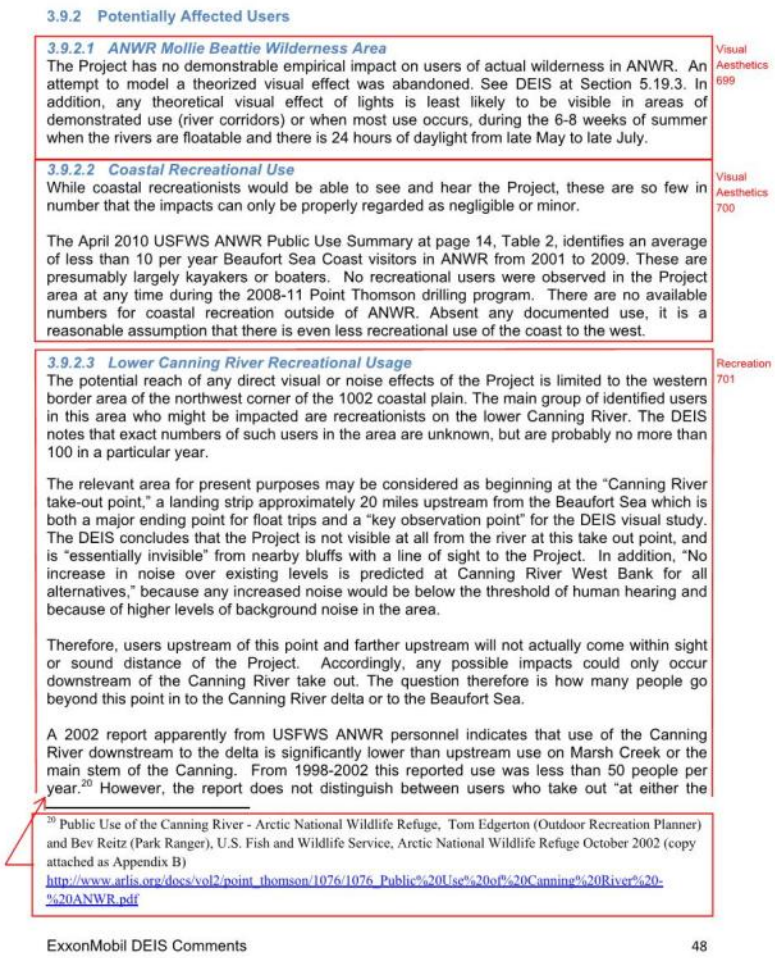	699 See response to Comment 689. As indicated in the recreation section, use does occur on the ACP and at the Sadlerochit Mountains during dim and dark periods of fall and winter, both by local residents who are known to circle the Sadlerochit Mountains, and by visitors both on river/tundra and on snow. 700 The EIS indicates that use numbers are very low. Besides visiting recreationists/tourists, the EIS also considers the recreational component of local residents who use the coastal corridor for hunting, seasonal camps, and transportation by boat and snowmobile year-round. 701 See the responses to Comments 700 and 726.

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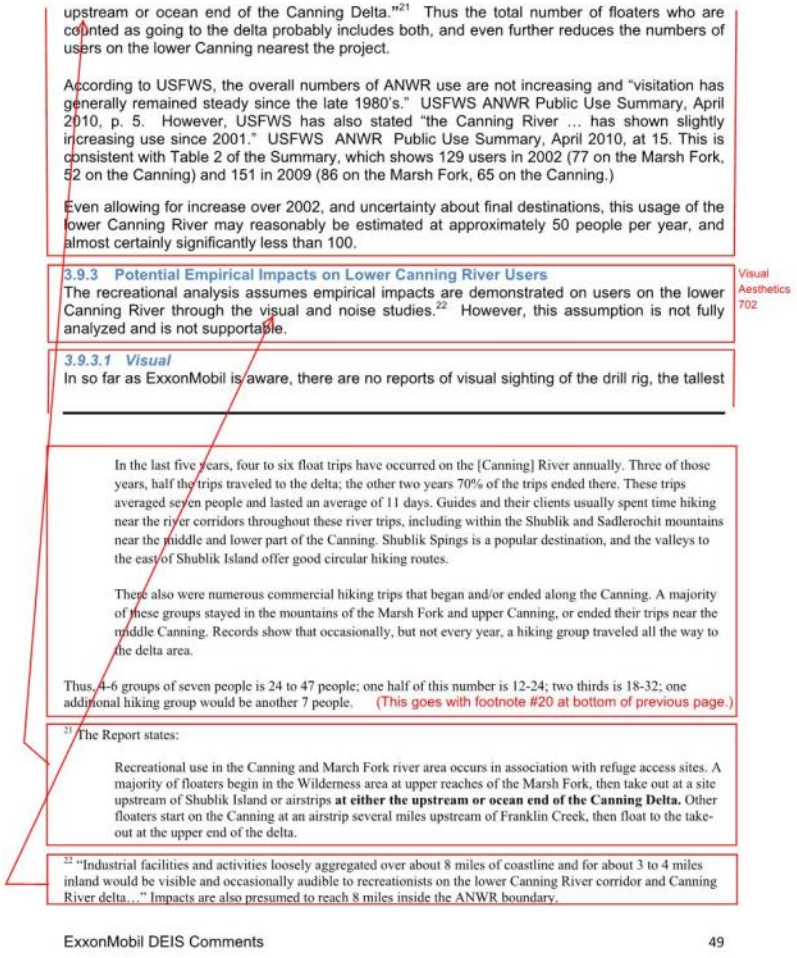	702 See the response to Comments 703 and 704 below.

upstream or ocean end of the Canning Delta."[21] Thus the total number of floaters who are counted as going to the delta probably includes both, and even further reduces the numbers of users on the lower Canning nearest the project.

According to USFWS, the overall numbers of ANWR use are not increasing and "visitation has generally remained steady since the late 1980's." USFWS ANWR Public Use Summary, April 2010, p. 5. However, USFWS has also stated "the Canning River … has shown slightly increasing use since 2001." USFWS ANWR Public Use Summary, April 2010, at 15. This is consistent with Table 2 of the Summary, which shows 129 users in 2002 (77 on the Marsh Fork, 52 on the Canning) and 151 in 2009 (86 on the Marsh Fork, 65 on the Canning.)

Even allowing for increase over 2002, and uncertainty about final destinations, this usage of the lower Canning River may reasonably be estimated at approximately 50 people per year, and almost certainly significantly less than 100.

3.9.3 Potential Empirical Impacts on Lower Canning River Users

Visual Aesthetics 702

The recreational analysis assumes empirical impacts are demonstrated on users on the lower Canning River through the visual and noise studies.[22] However, this assumption is not fully analyzed and is not supportable.

3.9.3.1 Visual

In so far as ExxonMobil is aware, there are no reports of visual sighting of the drill rig, the tallest

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In the last five years, four to six float trips have occurred on the [Canning] River annually. Three of those years, half the trips traveled to the delta; the other two years 70% of the trips ended there. These trips averaged seven people and lasted an average of 11 days. Guides and their clients usually spent time hiking near the river corridors throughout these river trips, including within the Shublik and Sadlerochit mountains near the middle and lower part of the Canning. Shublik Spings is a popular destination, and the valleys to the east of Shublik Island offer good circular hiking routes.

There also were numerous commercial hiking trips that began and/or ended along the Canning. A majority of these groups stayed in the mountains of the Marsh Fork and upper Canning, or ended their trips near the middle Canning. Records show that occasionally, but not every year, a hiking group traveled all the way to the delta area.

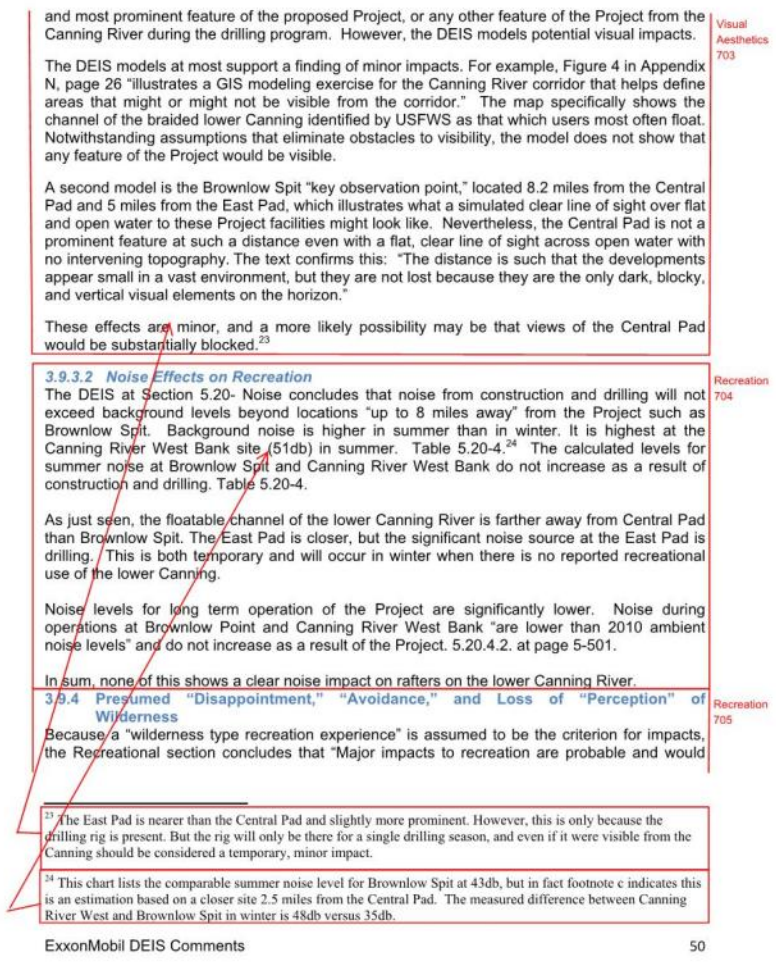
Thus, 4-6 groups of seven people is 24 to 47 people; one half of this number is 12-24; two thirds is 18-32; one additional hiking group would be another 7 people. (This goes with footnote #20 at bottom of previous page.)

[21] The Report states:

Recreational use in the Canning and March Fork river area occurs in association with refuge access sites. A majority of floaters begin in the Wilderness area at upper reaches of the Marsh Fork, then take out at a site upstream of Shublik Island or airstrips **at either the upstream or ocean end of the Canning Delta.** Other floaters start on the Canning at an airstrip several miles upstream of Franklin Creek, then float to the take-out at the upper end of the delta.

[22] "Industrial facilities and activities loosely aggregated over about 8 miles of coastline and for about 3 to 4 miles inland would be visible and occasionally audible to recreationists on the lower Canning River corridor and Canning River delta…" Impacts are also presumed to reach 8 miles inside the ANWR boundary.

ExxonMobil DEIS Comments 49

Comment	Response
	703 Regarding sighting from the Canning River corridor, the corridor is defined as the river itself and land along both sides. Project personnel observed the drill rig in July 2010 from the corridor alongside the river from 20 miles away (barely visible). GIS modeling of visibility from the river itself was based on an observer 3 feet above the existing (modeled) ground/river surface, and substantial areas of visibility of the ground surface across the coastal plain to the project site were noted from points throughout the delta. Figure 4 in Appendix N notes that increases in target height or observer height would be expected to rapidly increase the surface area that would be visible; i.e., the figure shows the minimum surface area that might be visible and does not account for the observer standing on the river bank (effectively doubling observer height) or the height of proposed structures (typically 10 feet to more than 150 feet above the surface). Taken together with indications from the Brownlow Spit key observation point, these indicators show a high likelihood for seeing project facilities at the Central Pad, and at the East Pad, which is located about 3 miles closer to the lower end of the Canning River Corridor than the Central Pad. Finally, the visual impacts are not only impacts to recreation. For example impacts are anticipated from noise and general activity associated especially with regular air traffic flying close to the refuge boundary. The recreation section addresses all recreation in the area, including use of the coastal corridor, where proposed facilities, including the most visually prominent, would be located within the corridor itself. 704 The noise section (Section 5.20) reports Leq decibel level, or equivalent sound pressure levels over time, and reports averages of hourly data--essentially averages of averages. Recording equipment and recreation personnel in the field near the exploratory drilling activity in 2010 noted instantaneous sounds from the exploratory drilling operation, and USFWS reported researchers at the mouth of Canning River in a camp hearing the drilling operation. The steady rumble of a generator may be less obvious than the sharp sounds of a backup bell on a truck or the sound of an aircraft on takeoff. Finally, the recreation analysis is not focused solely on the Arctic Refuge but on the entire recreation picture, including the coastal corridor/state land. See also the response to Comment 703. 705 Regarding "reasonable basis," while there have been limited industrial/exploratory activities on state and federal land in the study area since the 1970s, these uses have been short-duration, temporary, and often in winter, and most years there has been no industrial activity, especially during the summer recreation season. Therefore, to date, it has been reasonable to assume a "wilderness type" recreation experience is available based on activity occurring in the area, regardless of land management. Considering land management, it is reasonable to assume that such an experience may not always be available in the future. However, future long-term, year-round industrial activity would be a change, with potential impact, and this is what the EIS describes. The EIS acknowledges that the number of recreationists is very small. The EIS describes

Comment	Response
	the loss of recreational opportunity as well as effects to existing recreation. Regarding free public access to the coast, the text has been modified in 5.18.2, Alternative A: No Action and 5.18.4, Alternative B: Applicant's Proposed Action to clarify where facilities would be on the coast. The word "prominent" has been removed in 5.18.3.2, Drilling and Operations. Thickening pipeline walls to protect against bullets is a measure to prevent spills. Thickening pipeline walls would be expected to do little to mitigate the displacement of hunters or their discomfort about firing toward the pipeline. Wording has been clarified on this topic in 5.18.3.2.

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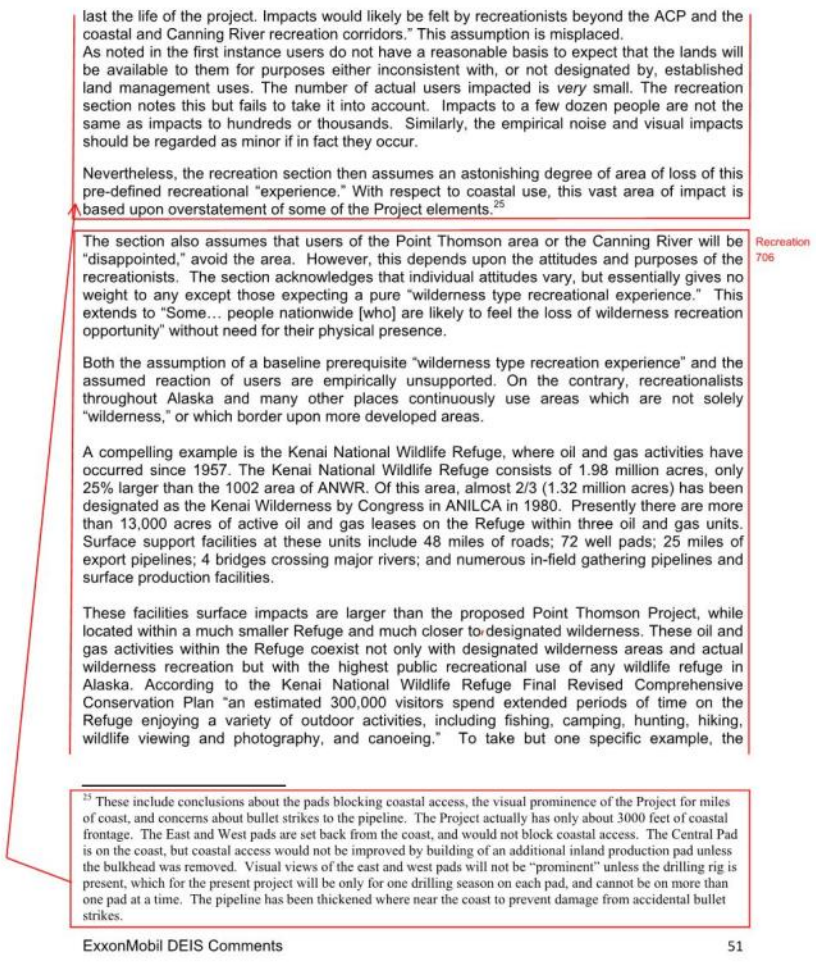
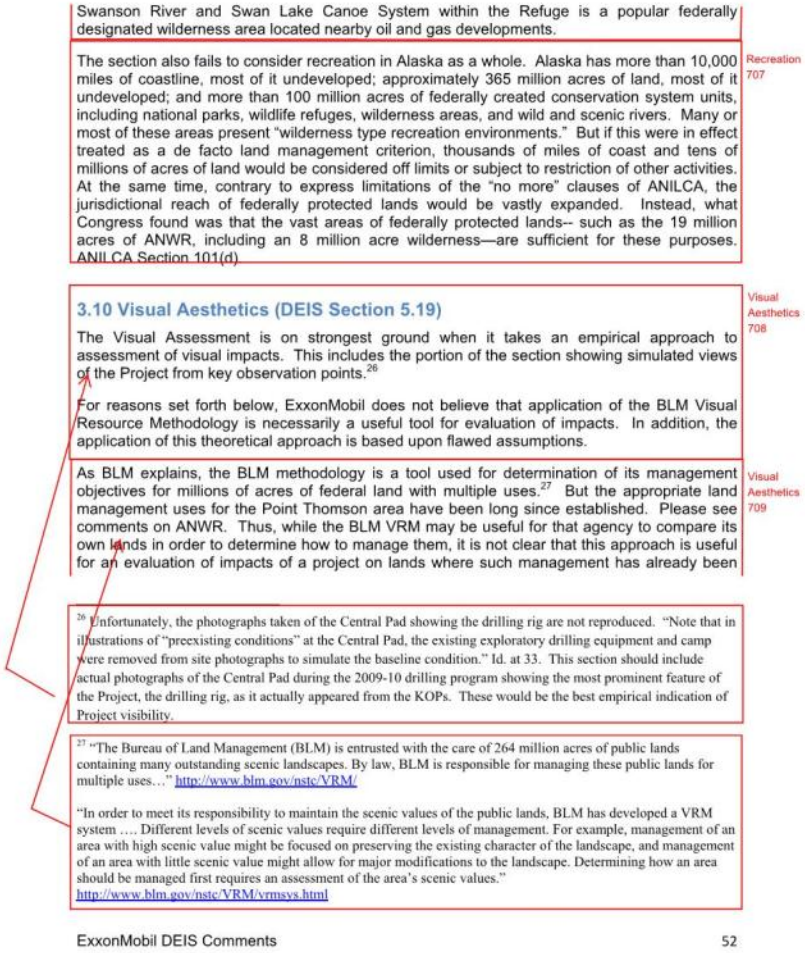
	706 The EIS explains that, while other types of recreationists may pass through the area by boat or aircraft, they are "not likely to recreate on the ground in or near the study area" (Draft EIS p. 3-246); the EIS therefore emphasizes the "wilderness type" recreationists who do use the land in the study area and stay overnight. Section 5.18.3.2, Drilling and Operations, in the paragraphs on "Effects to Recreation" have been changed slightly to more accurately describe changes to the recreation experience and eliminate reference to "disappointment." A key difference between the Kenai National Wildlife Refuge and the Arctic Refuge is that the Kenai Refuge lowlands are heavily forested, so that industrial activity is visually and to some extent audibly screened from designated units of the National Wilderness Preservation System and from most areas used for recreation. Also, the Point Thomson EIS is not meant to imply that recreation would not be possible in the future; rather, the EIS is meant to disclose that the recreation experience and opportunity would change once the project was implemented, both on refuge land and on state land.

Comment	Response
	707 The recreation section of the EIS concerns itself principally with the project study area and changes anticipated within the study area. The type of experience available is not the same as land management. The recreation section addresses primarily the recreation experience available. 708 The methods for assessment and the baseline condition for the visual assessment were the subject of substantial discussion among the agencies and with the Applicant at the beginning of the project while developing the scope of work for the visual assessment. It is acknowledged that the Applicant raised similar issues at that time. The agencies took those into account in making their decisions, and the visual assessment process followed those decisions. The use of a pre-2009 baseline was based on the temporary nature of the 2009-2010 exploratory drilling and its status as part of the current project. Under the No Action Alternative, the area is assumed to return to pre-2009 conditions, because no other reasonably foreseeable future actions are expected in the area that would permanently alter the visual environment if the Point Thomson Project does not go forward. 709 The BLM Visual Resources Management system was not applied to the Point Thomson area for the purpose of creating new management decisions about how the scenery would be managed by the state, the Arctic Refuge, or any other entity. Rather, the system was applied to create a "visual resource inventory" (characterizing the affected environment) and to create a "visual resource contrast rating" (describing consequences or impacts). The inventory notes the existing visual management objectives of the area land managers and has nothing to do with BLM management and does not attempt to apply one agency's management to another agency's land. See also the response to Comment 708.

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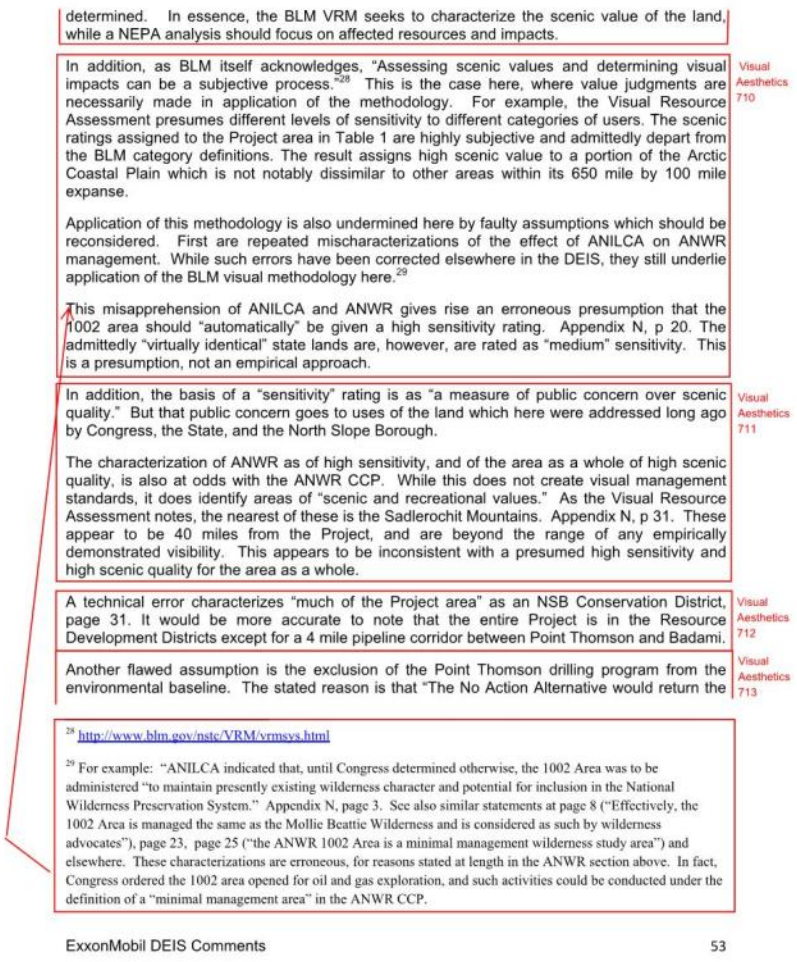
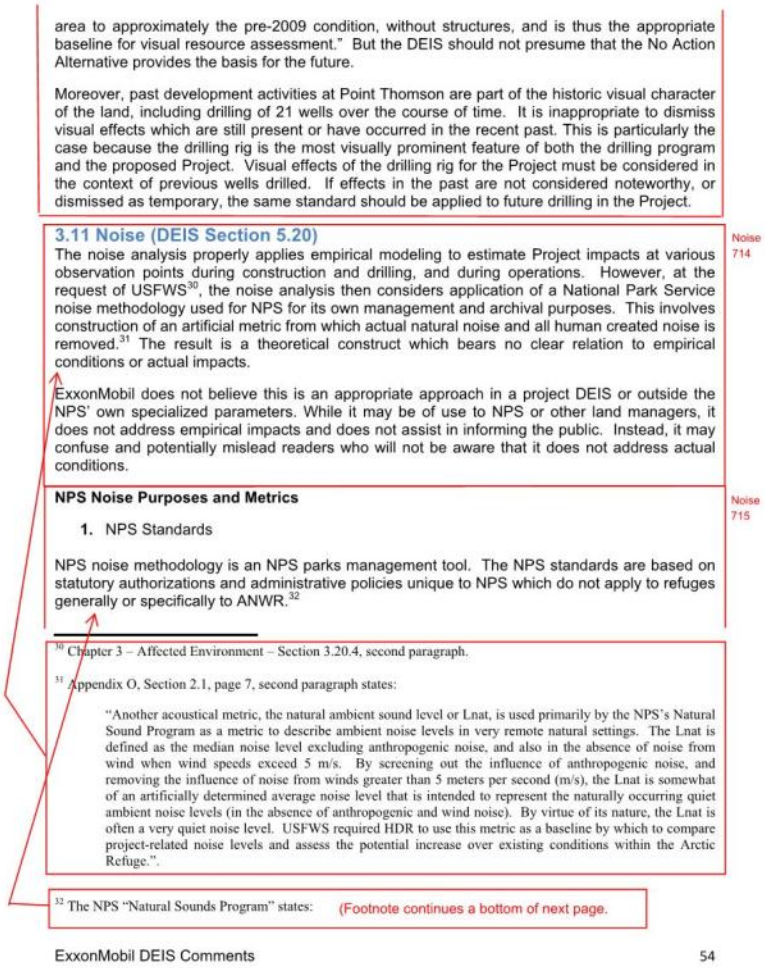
	710 The quoted text from BLM about subjectivity is immediately followed by further text stating, "objectivity and consistency can be greatly increased by using the basic design elements of form, line, color, and texture, which have often been used to describe and evaluate landscapes, to also describe proposed projects." The Corps used these elements in the visual analysis for this purpose. The visual assessment originally was prepared based on information from USFWS regarding applicability of ANILCA Sections 1001 and 1004 to the 1002 Area as a "wilderness study area." The Department of Interior has since clarified its intent and interpretation. The Visual Assessment (Appendix N) and associated text in the EIS has been reviewed, and direct and indirect references to the wilderness study area, ANILCA, and Congressional intent have been changed. In addition, the application of the BLM visual assessment methods and the ultimate conclusions were reviewed. The conclusions remain valid even though the reasoning behind some elements of inventory and assessment has been modified. While the 1002 Area is not a wilderness study area designated by Congress, it is managed in part for its wilderness qualities and values and public interest is different for refuge lands than for state lands, and therefore the impacts discussed are accurate. The 1002 Area has many qualities of a "special area" that would "automatically" qualify the area for a high sensitivity rating. However, as discussed in the preceding sentences, this language has been changed. While the sensitivity rating is no longer "automatic," refuge lands are nonetheless still given a high sensitivity rating because management is different than the state land. It is not a presumption; it is based on the BLM method. See also the response to Comment 708. 711 The sensitivity level rating units are described in the EIS in Section 3.19.3.3, Sensitivity Level Analysis, and in Section 3.3 of the visual assessment report (Appendix N) as a function of types of users, level or use, public interest, adjacent land uses, and special areas. Some wording has been changed to clarify intent. The sensitivity level rating units are designated with only partial regard to management. Per BLM methods, the ratings include substantial influence of actual existing human use (as opposed to management) and of public interest. The special areas reference in the EIS has been clarified to match changes in the Appendix N Visual Assessment Report (see also the end of the response to Comment 710). The CCP identifies "scenic/recreation values" as one of four types of "special values" of the refuge as a whole and names examples of site specific areas known for some of these values, including scenic/recreation values. The visual assessment for the project examines a specific area of land against specific criteria and methodology. The two efforts cannot be directly compared. The EIS does describe what the CCP says about scenic/recreation values. 712 The Resource Development District has been added to the Visual Assessment in Appendix N, Section 3.5.4.

Comment	Response
	713 The primary difference between all past exploratory drilling/activity and the current Point Thomson Project is that past efforts were short in duration and temporary, while the proposed project would consist of infrastructure that would be present year-round and effectively permanent. See also response to Comment 708. 714 The Corps, in coordination with USFWS, selected NPS methods to characterize the ambient soundscape and assess potential project-related effects inside ANWR. The reasoning behind this decision is discussed in Section 3.20.4, Acoustic Monitoring Objectives. As stated, "Due to the unique natural soundscapes in the Arctic Refuge and concerns over noise-related disturbances to refuge wildlife, the USFWS accepted the NPS recommendation and requested that the NPS Natural Sounds Program, 'Acoustics and Soundscape Studies in National Parks,' be used for soundscape monitoring (NPS 2005). This methodology was subsequently adopted by the Corps for the project noise assessment within the Arctic Refuge." 715 See the response to Comment 714.

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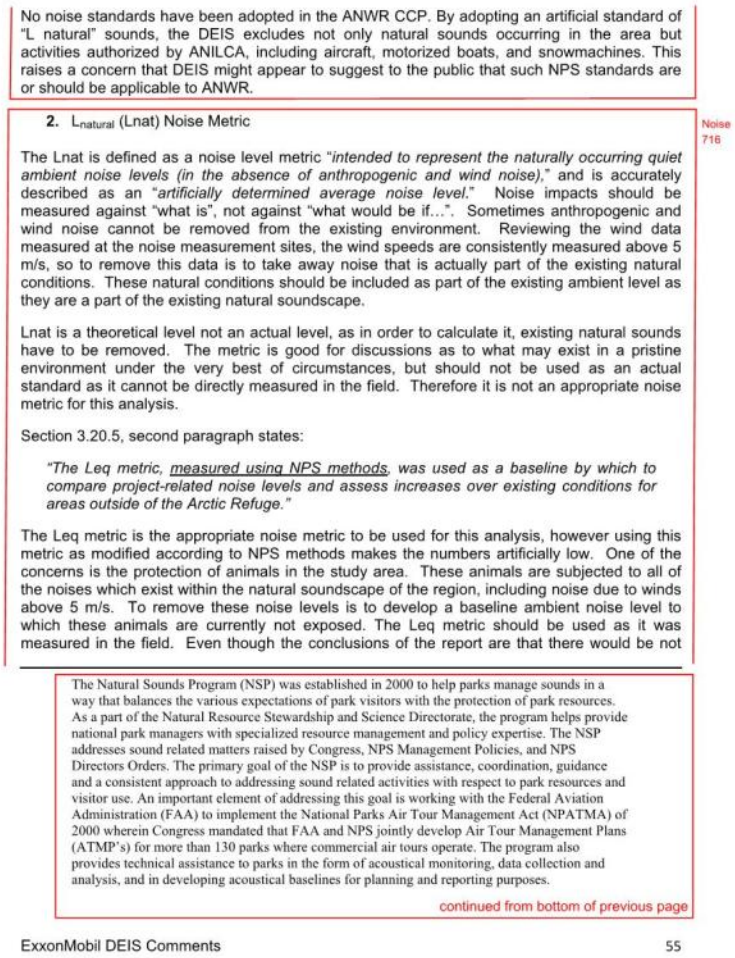	716 See the response to Comment 714.

No noise standards have been adopted in the ANWR CCP. By adopting an artificial standard of "L natural" sounds, the DEIS excludes not only natural sounds occurring in the area but activities authorized by ANILCA, including aircraft, motorized boats, and snowmachines. This raises a concern that DEIS might appear to suggest to the public that such NPS standards are or should be applicable to ANWR.

2. $L_{natural}$ (Lnat) Noise Metric

Noise 716

The Lnat is defined as a noise level metric "*intended to represent the naturally occurring quiet ambient noise levels (in the absence of anthropogenic and wind noise),*" and is accurately described as an "*artificially determined average noise level.*" Noise impacts should be measured against "what is", not against "what would be if…". Sometimes anthropogenic and wind noise cannot be removed from the existing environment. Reviewing the wind data measured at the noise measurement sites, the wind speeds are consistently measured above 5 m/s, so to remove this data is to take away noise that is actually part of the existing natural conditions. These natural conditions should be included as part of the existing ambient level as they are a part of the existing natural soundscape.

Lnat is a theoretical level not an actual level, as in order to calculate it, existing natural sounds have to be removed. The metric is good for discussions as to what may exist in a pristine environment under the very best of circumstances, but should not be used as an actual standard as it cannot be directly measured in the field. Therefore it is not an appropriate noise metric for this analysis.

Section 3.20.5, second paragraph states:

> *"The Leq metric, measured using NPS methods, was used as a baseline by which to compare project-related noise levels and assess increases over existing conditions for areas outside of the Arctic Refuge."*

The Leq metric is the appropriate noise metric to be used for this analysis, however using this metric as modified according to NPS methods makes the numbers artificially low. One of the concerns is the protection of animals in the study area. These animals are subjected to all of the noises which exist within the natural soundscape of the region, including noise due to winds above 5 m/s. To remove these noise levels is to develop a baseline ambient noise level to which these animals are currently not exposed. The Leq metric should be used as it was measured in the field. Even though the conclusions of the report are that there would be not

The Natural Sounds Program (NSP) was established in 2000 to help parks manage sounds in a way that balances the various expectations of park visitors with the protection of park resources. As a part of the Natural Resource Stewardship and Science Directorate, the program helps provide national park managers with specialized resource management and policy expertise. The NSP addresses sound related matters raised by Congress, NPS Management Policies, and NPS Directors Orders. The primary goal of the NSP is to provide assistance, coordination, guidance and a consistent approach to addressing sound related activities with respect to park resources and visitor use. An important element of addressing this goal is working with the Federal Aviation Administration (FAA) to implement the National Parks Air Tour Management Act (NPATMA) of 2000 wherein Congress mandated that FAA and NPS jointly develop Air Tour Management Plans (ATMP's) for more than 130 parks where commercial air tours operate. The program also provides technical assistance to parks in the form of acoustical monitoring, data collection and analysis, and in developing acoustical baselines for planning and reporting purposes.

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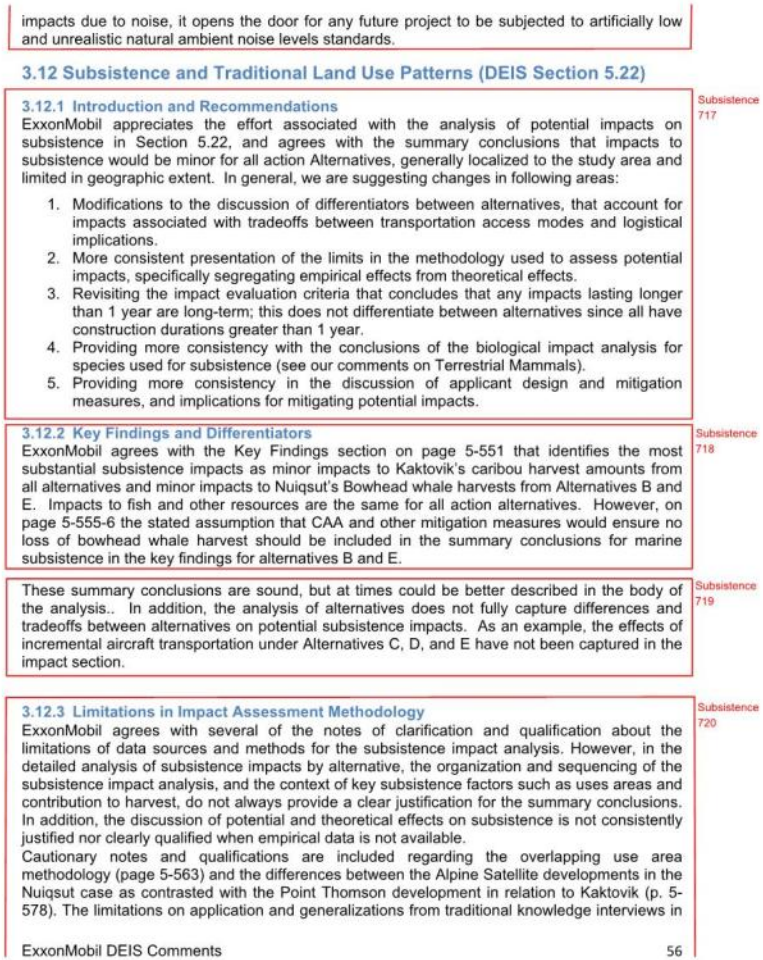
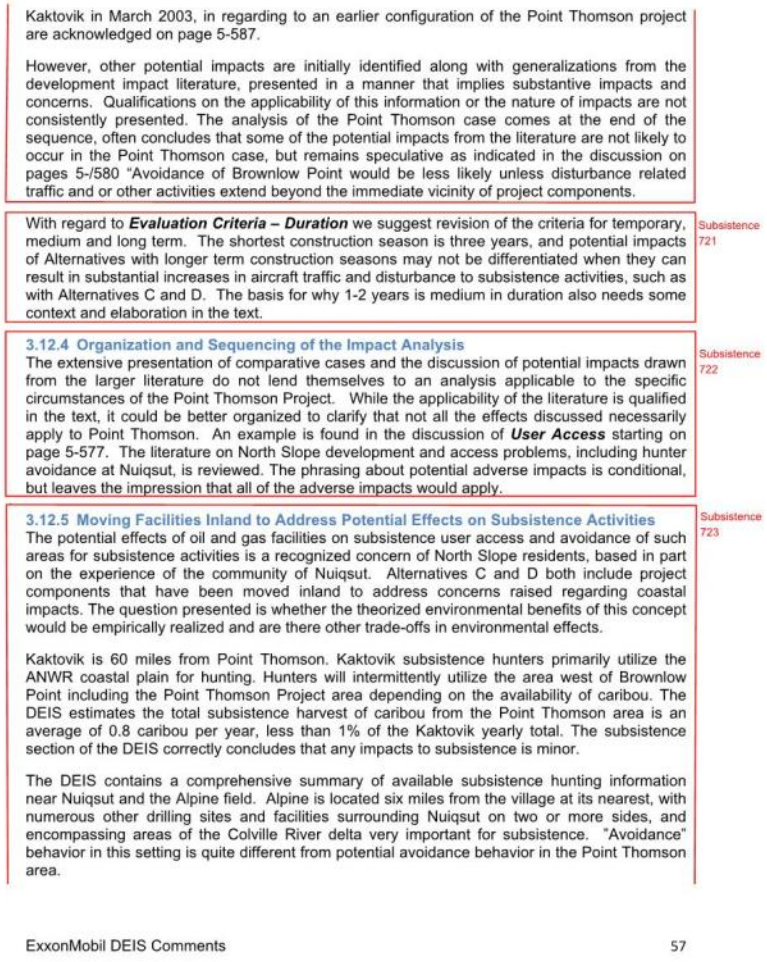
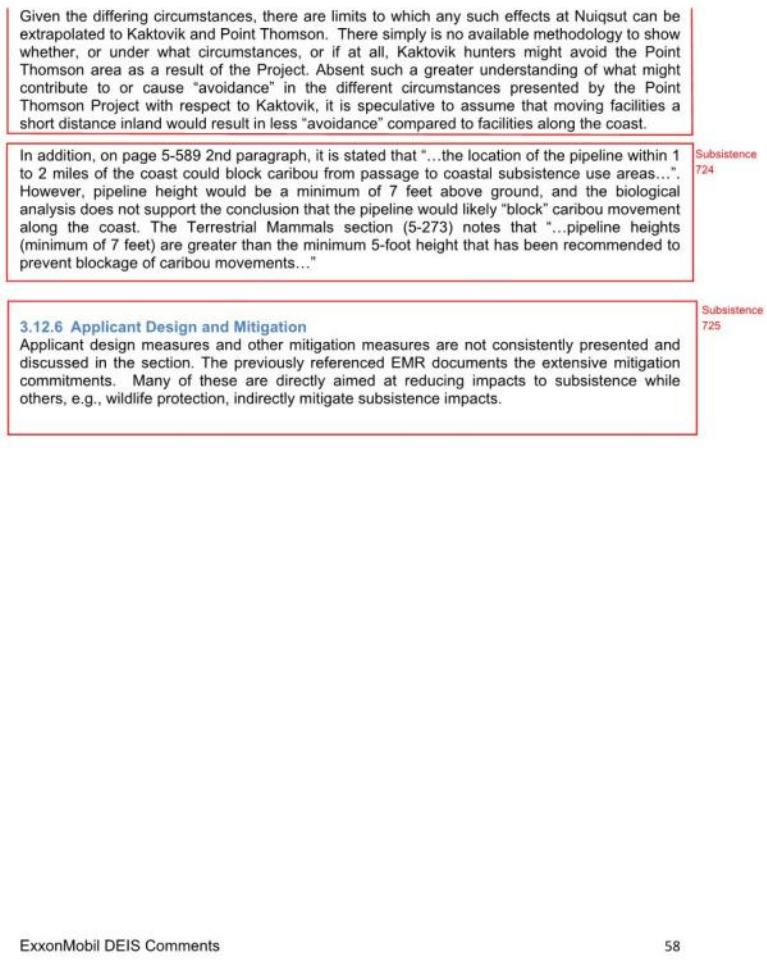
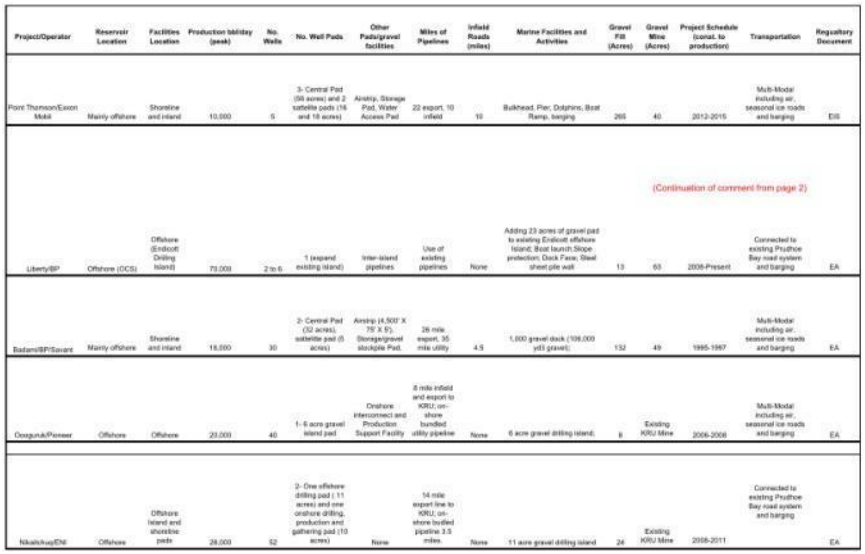
Comment	Response
	717 1. Modifications to the discussion: The discussion of differentiators between alternatives acknowledges that transportation access modes for each alternative (e.g., gravel road under Alternative C, heavier air transport under Alternative E) are major differentiators for impacts on subsistence and provides a discussion of transportation effects by alternative. However, it is not appropriate for the subsistence impact discussion to discuss the logistical implications of different transportation access modes. This is addressed in Chapter 2, Alternatives, and Section 5.17, Transportation. 2. The Corps has considered the commenter's recommendation for improvements to the impact criteria and has made the decision not to incorporate the recommendations in the Final EIS. The Corps and cooperating agencies developed and agreed to the framework and general methodology for impact criteria (see Chapter 4), which provides a solid framework for analyzing impacts to the environment. The resource-specific impact criteria definitions presented in Chapter 5 are based on scientific literature and the best professional judgment of the Corps, cooperating agencies, and third-party EIS contractor subject matter experts. The definitions allow for analyses based on quantitative data, where available, and qualitative information and best professional judgment where quantitative data were unavailable. 3. The duration levels were based on subsistence impact analyses provided in recent U.S. Department of Interior EIS documents (USDOI MMS 2003, 2007). 4. Biological impact analysis: The Corps has determined that the findings of the subsistence section are consistent with the biological impact analyses. As stated in Section 5.22.1.8, Subsistence Impact Summary, "…while impacts to subsistence resources may be identified as minimal from a biological standpoint, localized changes in resource access and availability, including perceived changes in resource health due to development, can have larger effects on subsistence uses." 5. Applicant design and mitigation measures: Additional discussion of mitigation measures is included in Section 4.4, Impact Avoidance, Minimization, and Mitigation. 718 The following text was added to the key findings summary for Alternatives B and E: "Applicant-proposed mitigation (e.g., conflict avoidance agreements between the Applicant and the AEWC restricting barge activities during the bowhead whale hunting season and employing marine mammal observers) would reduce potential impacts on bowhead whales adequately to ensure no loss of bowhead whale harvests for the community of Nuiqsut." 719 The Corps believes that the differences between the alternatives in Section 5.22, Subsistence and Traditional Land Use, are captured both in the individual alternative discussions, where primary differences between alternatives are pointed out, and in the Summary and Comparison of Alternatives discussion. Regarding the second comment, the impact differences for Alternatives C, D, and E related to air transportation were addressed under each of these

Comment	Response
	alternatives. 720 Subsistence impacts are not easily quantified and are often based on the resource specialist's best professional judgment. The impact analysis for subsistence (like the impact analyses for other resources) relies in part on drawing parallels to previous developments and their documented effects. The subsistence analysis presents such parallels and previously documented impacts and then discusses how or if the Point Thomson Project may also cause related impacts. The analysis also draws on available data (e.g., use area and harvest amount data) to determine to what extent such impacts may occur. This approach of assessing subsistence effects was discussed at agency meetings, the Corps reviewed the methodology, and the Corps concurred with the use of this methodology. The purpose of the Subsistence Impact Summary is to summarize potential impacts of the development with qualified parallels to previous development projects. The individual alternative discussions draw on the Subsistence Impact Summary without always restating the qualifications, parallels, or justifications presented in the summary. The changes suggested by the commenter would not change the overall conclusions of the subsistence impact analysis. The Corps believes that, in general, the impact discussion includes adequate justifications to support the conclusions.

Comment	Response
	721 The Corps has considered the commenter's recommendation for improvements to the impact criteria and has made the decision not to incorporate the recommendations in the Final EIS. The Corps and cooperating agencies developed and agreed to the framework and general methodology for impact criteria (see Chapter 4), which provides a solid framework for analyzing impacts to the environment. The resource-specific impact criteria definitions presented in Chapter 5 are based on scientific literature and the best professional judgment of the Corps, cooperating agencies, and third-party EIS contractor subject matter experts. The definitions allow for analyses based on quantitative data, where available, and qualitative information and best professional judgment where quantitative data were unavailable. 722 The Corps believes that the presentation of comparative cases, as well as the application of the knowledge and experience of the authors regarding impacts of development on subsistence, is necessary for discussing the potential impacts of any development, despite the fact that all development projects are different in terms of project design and geographic situation. Quantitative data (available subsistence data such as use areas and harvest amounts as well as project footprint and design information) allow for discussion of how a specific development project may result in certain types of impacts. 723 The Corps believes that the impact discussion presents comparative cases while also discussing the potential impacts of the Point Thomson Project on subsistence uses by using project specific use area, harvest amount, project design, and other data. It is explicit in the discussion of comparative cases that not all impacts would occur at the same level (or at any level) in the case of the Point Thomson Project. In addition, the current discussion provides qualifications and cautionary notes regarding the applicability of comparative cases to the Point Thomson Project; however, the presentation of these comparative cases is necessary for establishing the types of impacts that may occur.

Comment	Response
	724 The text in question has been deleted for the Final EIS so that the sentence reads "…the location of the pipeline within 1 to 2 miles of the coast could result in user avoidance of previously highly used areas along the coast between the East Pad and Bullen Point." 725 The Draft EIS presented only the Applicant design measures, which are listed in Chapter 4 and also discussed in each resource section. Additional mitigation measures as developed by the Corps and cooperating agencies are included in the Final EIS in Chapter 4 and each resource section.

Comment	Response
4 Appendix A – Comparison of North Slope Projects EIS General (Continuation of comment from page 2)	Comment Document 230 continued.
	
5 Appendix B - Public Use of the Canning River	

Project/Operator	Reservoir Location	Facilities Location	Production bbl/day (peak)	No. Wells	No. Well Pads	Other Pads/gravel facilities	Miles of Pipelines	Infield Roads (miles)	Marine Facilities and Activities	Gravel Fill (Acres)	Gravel Mine (Acres)	Project Schedule (const. to production)	Transportation	Regulatory Document
Point Thomson/Exxon Mobil	Mainly offshore	Shoreline and inland	10,000	5	3- Central Pad (58 acres) and 2 satellite pads (16 and 18 acres)	Airstrip, Storage Pad, Water Access Pad	22 export, 10 infield	10	Bulkhead, Pier, Dolphins, Boat Ramp, barging	265	40	2012-2015	Multi-Modal including air, seasonal ice roads and barging	EIS
												(Continuation of comment from page 2)		
Liberty/BP	Offshore (OCS)	Offshore (Endicott Drilling Island)	70,000	2 to 6	1 (expand existing island)	Inter-island pipelines	Use of existing pipelines	None	Adding 23 acres of gravel pad to existing Endicott offshore Island; Boat launch; Slope protection; Dock Face; Steel sheet pile wall	13	63	2008-Present	Connected to existing Prudhoe Bay road system and barging	EA
Badami/BP/Savant	Mainly offshore	Shoreline and inland	18,000	30	2- Central Pad (32 acres), satellite pad (5 acres)	Airstrip (4,500' X 75' X 5'); Storage/gravel stockpile Pad.	26 mile export, 35 mile utility	4.5	1,000 gravel dock (108,000 yd3 gravel);	132	49	1995-1997	Multi-Modal including air, seasonal ice roads and barging	EA
Oooguruk/Pioneer	Offshore	Offshore	20,000	40	1- 6 acre gravel island pad	Onshore interconnect and Production Support Facility	8 mile infield and export to KRU; on-shore bundled utility pipeline	None	6 acre gravel drilling island;	8	Existing KRU Mine	2006-2008	Multi-Modal including air, seasonal ice roads and barging	EA
Nikaitchuq/Eni	Offshore	Offshore Island and shoreline pads	28,000	52	2- One offshore drilling pad (11 acres) and one onshore drilling, production and gathering pad (10 acres)	None	14 mile export line to KRU; on-shore bodied pipeline 3.5 miles.	None	11 acre gravel drilling island	24	Existing KRU Mine	2008-2011	Connected to existing Prudhoe Bay road system and barging	EA

Comment	Response
	726 The document mentioned is not a document collected during preparation of the EIS. The document provides some additional specific details but does not contradict the EIS's characterization of low recreational use or type of use.

Recreation
726

Public Use of the Canning River - Arctic National Wildlife Refuge

Tom Edgerton (Outdoor Recreation Planner) and Bev Reitz (Park Ranger)
U.S. Fish and Wildlife Service, Arctic National Wildlife Refuge
October 2002

With beautiful scenery and good headwaters access, the Canning River, along with it's major tributary the Marsh Fork, is the longest north flowing river on the Arctic Refuge. The river's delta area, which begins about 15 miles from the coast, becomes extensively braided and wide before it empties into the Beaufort Sea.

Recreational use in the Canning and Marsh Fork river area occurs in association with refuge access sites. A majority of floaters begin in the Wilderness area at upper reaches of the Marsh Fork, then take out at a site upstream of Shublik Island or airstrips at either the upstream or ocean end of the Canning delta. Other floaters start on the Canning at an airstrip several miles upstream of Franklin Creek, then float to the take-out at the upper end of the delta.

Since 1988, the Canning, including the Marsh Fork, has been the Refuge's fourth most used river by commercial guides and their clients. In the last five years, four to six float trips have occurred on the River annually. Three of those years, half the trips traveled to the delta; the other two years 70% of the trips ended there. These trips averaged seven people and lasted an average of 11 days. Guides and their clients usually spent time hiking near the river corridors throughout these river trips, including within the Shublik and Sadlerochit mountains near the middle and lower part of the Canning. Shublik Spings is a popular destination, and the valleys to the east of Shublik Island offer good circular hiking routes.

There also were numerous commercial hiking trips that began and/or ended along the Canning. A majority of these groups stayed in the mountains of the Marsh Fork and upper Canning, or ended their trips near the middle Canning. Records show that occasionally, but not every year, a hiking group traveled all the way to the delta area. They also show that groups commonly hiked from the landing strip at Sunset Pass in and around the Sadlerochit Mountains and the Ignek Valley. Visitors hiked around the mountains, between Sunset Pass and the Katakturuk Valley, or north of the mountains as far east as Carter Creek to an access site along Camden Bay.

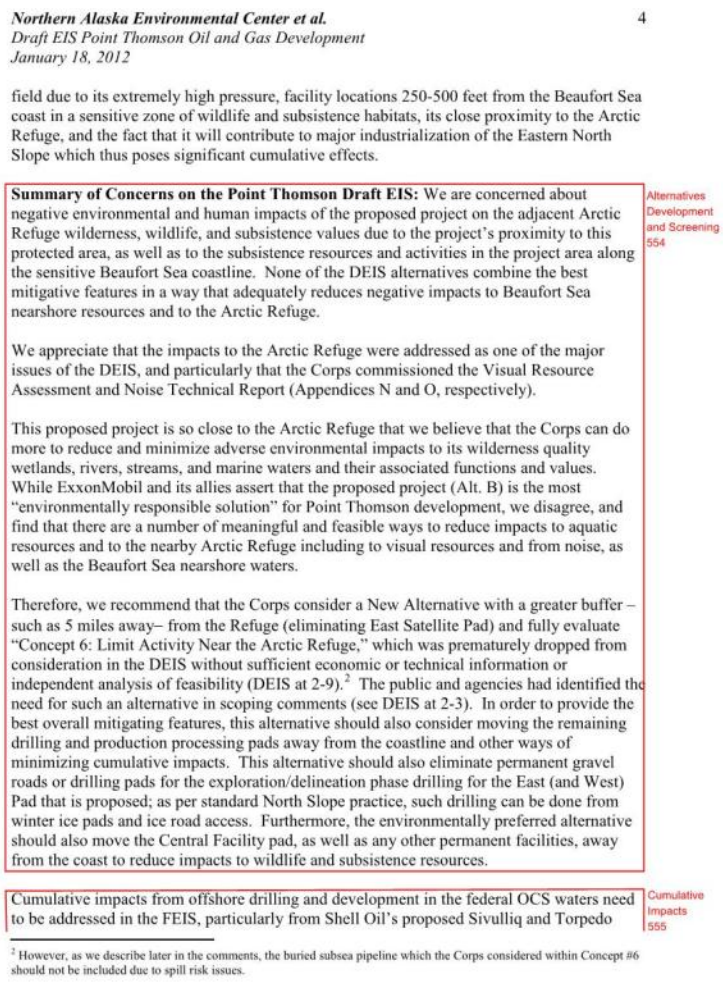
According to the last five years worth of public use data collected from recreational guides and air taxi operators on the refuge, a majority of the recreational use (hiking and floating) in the area takes place between late May and the middle of September. During the last five years, visitors hiked the river corridor and surrounding mountains from May 30 to September 20, with a peak in early to mid June. The boating season on the Canning River generally starts a couple of weeks later (June 10) depending upon icing conditions, and ends several weeks earlier (August 16). The average peak use period for boaters on the Canning is the last two weeks of June.

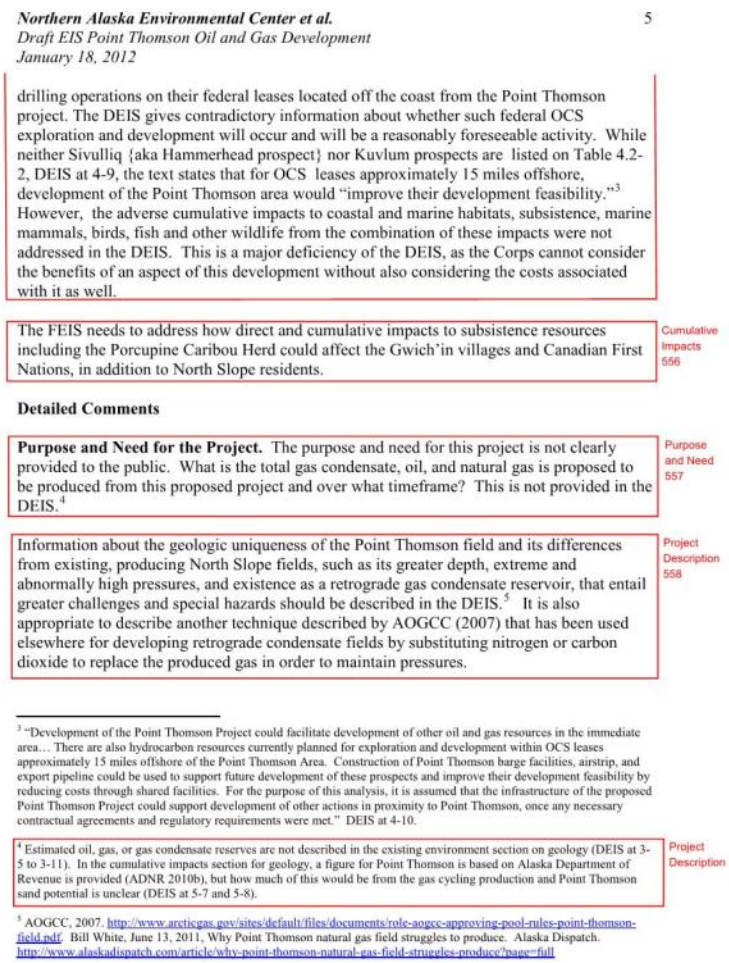
Refuge staff does not specifically track private recreational use due to the size of the Refuge and the myriad opportunities for access. Anecdotal information indicates that the use is only a small percentage (probably 5-15%) of the commercial activity, with some users hiking and occasionally camping north/northwest of the Sadlerochit Mountains to see the coast and wildlife including caribou, bears and muskoxen.

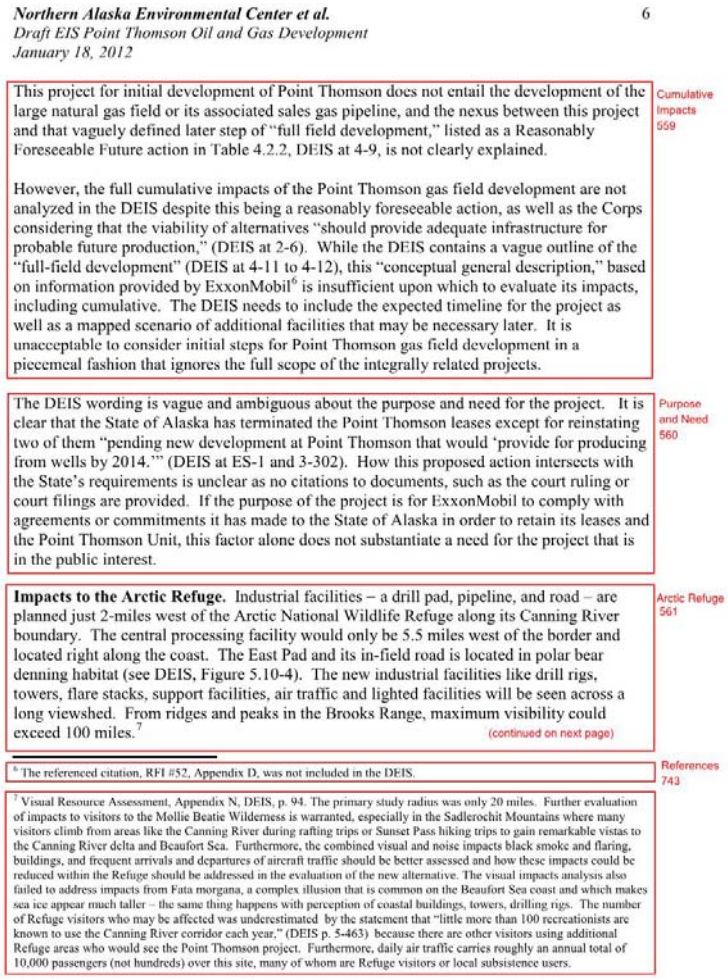
Comment	Response
0231_Pamela.Miller_NGO **NORTHERN ALASKA ENVIRONMENTAL CENTER** **ALASKA WILDERNESS LEAGUE** **GWICH'IN STEERING COMMITTEE** **SIERRA CLUB * DEFENDERS OF WILDLIFE** **THE WILDERNESS SOCIETY** **NATURAL RESOURCES DEFENSE COUNCIL** **FRIENDS OF ALASKA NATIONAL WILDLIFE REFUGES** **RESISTING ENVIRONMENTAL DESTRUCTION** **ON INDIGENOUS LANDS** January 18, 2012 Mr. Harry Baij Jr Department of the Army, U.S. Army Engineer District Alaska Regulatory Division P.O. Box 6898 JBER, AK 99506-0898 E-mail: harry.a.baij@usace.army.mil Re: Public Comments on Point Thomson Project Draft EIS, and Permit Application POA-2001-1082-M1 Dear Mr. Baij, We provide public comment on ExxonMobil's Point Thomson Project Draft Environmental Impact Statement and U.S. Army Corps of Engineers permit on behalf of the following non-profit conservation and Alaska Native organizations and our members -- Northern Alaska Environmental Center, Alaska Wilderness League, Gwich'in Steering Committee, Sierra Club, Natural Resources Defense Council, Friends of Alaska National Wildlife Refuges, The Wilderness Society, Defenders of Wildlife, and Resisting Environmental Destruction on Indigenous Lands (REDOIL). Please consider these public comments in response to 1) your public notice on the availability of the draft Environmental Impact Statement for the Proposed Point Thomson Project (hereafter "DEIS") (76 FR 70979-70980 - November 16, 2011); and 2) the Public Notice of Application for Permit (POA-2001-1082-M1; November 18, 2011) for the proposed dredge, excavation and fill work in the waters and navigable waters of the United States including streams, wetlands, and Beaufort Sea marine waters. ExxonMobil's proposed Point Thomson gas condensate development on State of Alaska lands includes three production well sites next to the Beaufort Sea coast, including one drill site within two miles of the Arctic National Wildlife Refuge. The adjacent Arctic Refuge boundary comprises the Canning River delta, an area rich in migratory birds, fish, and polar bear denning, as well as a popular recreational floated river, and a key subsistence resource Arctic Refuge 547	547 The EIS includes a separate section on the Arctic Refuge due to its proximity to the project and the Thomson Sand Reservoir. The analysis of impacts to the refuge and mitigation measures are presented in Section 5.14, Arctic National Wildlife Refuge, of the EIS.

Comment	Response
  and use area. It is a vital part of the intact Arctic Refuge landscape set aside 51 years ago, and a vital part of the Refuge today. We understand that the State of Alaska has dedicated the Point Thomson area for oil and gas development. We will discuss the environmental impacts of the proposed project and measures that could reduce impacts both in the project area on State lands and to the nearby Refuge. To put this in context, over 50 years ago in 1960, at the same time that President Eisenhower's Interior Secretary established the original Arctic Refuge, then called the Arctic National Wildlife Range, "for the purpose of preserving unique wildlife, wilderness and recreational values,"[1] he opened over 20 million acres of prime lands to the oil industry and the State of Alaska – including the "prize" of Prudhoe Bay. In the balance of North Slope land uses struck 50 years ago, the Canning River including its delta's westernmost channel called the Staines River is the dividing line. Considering that background, it is important to respect the Refuge by considering alternatives that will reduce impacts. Arctic Refuge 548 This proposed project will be a significant expansion of the oil and gas industrial complex to the east of Prudhoe Bay. ExxonMobil's Development Plan is analyzed in the DEIS as Alternative B. Three drill sites, including a processing plant at the Central Pad would be situated only 250-500 feet from the Beaufort Sea's eroding shoreline, with the East Pad just 2-miles away from the Arctic Refuge along its Canning/Staines River border. Alternatives Descriptions 549 The development project would connect via a 22-mile-long pipeline to the Badami oil field (in a positive step, there is no permanent access road proposed from Prudhoe Bay east to this project). There would also be 12-miles of permanent gravel roads within the field, a new mile-long airstrip and staging sites, a major new gravel mine where 2.6 million cubic yards of gravel would be excavated from 162-acres of tundra wetlands, 282-acres of tundra covered by gravel fill, and a gravel boat ramp and pier with a dredged area offshore for barge offloading. Although most of the Thomson reservoir is located offshore, we appreciate that the currently proposed project will not entail new drilling from barrier islands or offshore. We support ExxonMobil's removal of an earlier proposal for a gravel causeway/dock into the Beaufort Sea although the exact frequency and duration of the use of the currently proposed barge offloading facility should be made clearer. Alternatives Descriptions 550 We note that the DEIS provides documentation that the Thomson reservoir is outside the Arctic Refuge. However, exactly how development of other reasonably foreseeable fields in the region may proceed and the extent to which these will pose additional cumulative impacts from infrastructure and activities has not clearly quantified or described in the DEIS. Such activities could greatly increase the adverse impacts to the Arctic Refuge and its sensitive resources, and therefore need to be fully explained, particularly in the cumulative impacts section. Cumulative Impacts 551 [1] PLO 2214, December 2, 1960.	548 The EIS includes a separate section on the Arctic Refuge due to its proximity to the project and the Thomson Sand Reservoir. The analysis of impacts to the refuge and mitigation measures are presented in Section 5.14, Arctic National Wildlife Refuge, of the EIS. 549 Comment noted; no action required. 550 At this time the Corps has not determined if the barge facility would be part of the permitted action. Only after that determination is made would more exact information on frequency and duration of use be available. 551 The EIS acknowledges that there are other oil and gas leases in the area and that development of the Point Thomson Project could make development of other leases easier in the future. However, under the EIS definition of "reasonably foreseeable future action" there are no reasonably foreseeable future actions associated with the other leases, except for the Shell Oil offshore exploratory drilling program. There is no way to clearly quantify or describe activities or infrastructure that have not been proposed on these other leases. If other activities do occur in the future, they likely would be subject to their own EIS, which would disclose any expected impacts to the Arctic Refuge and other resources.

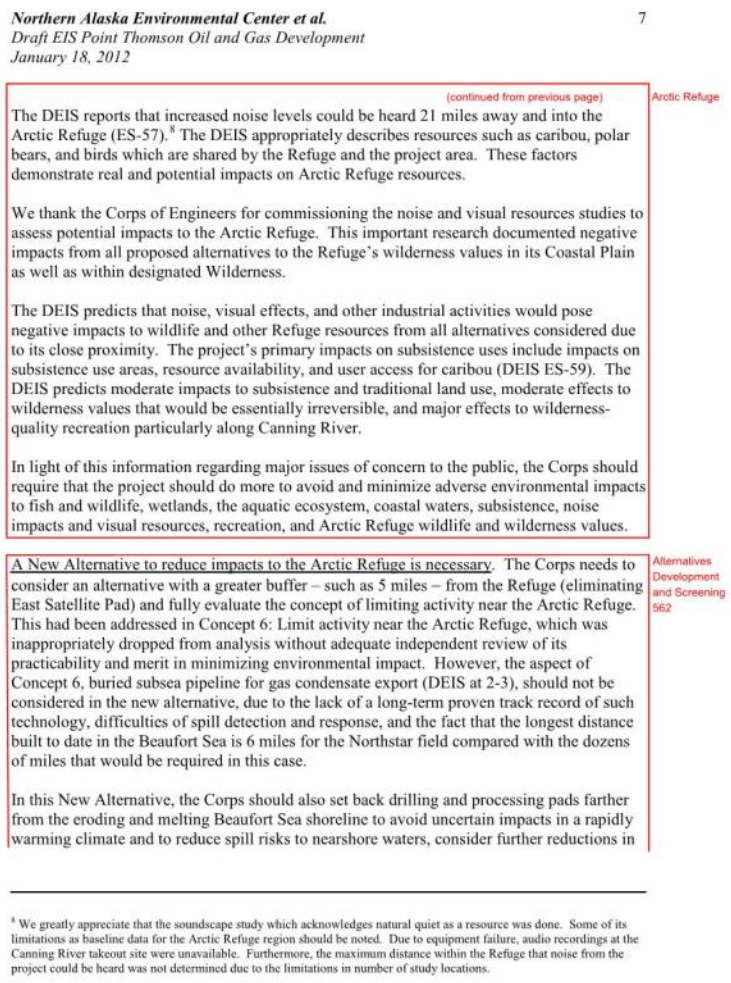
Comment	Response
  This proposed project is extremely close to the Arctic National Wildlife Refuge, a national treasure and globally significant circumpolar protected area. The Arctic Refuge encompasses the only area of wetlands, rivers, deltas, bays, lagoons, and other aquatic resources across the entire North Slope that area protected by law from oil and gas exploration, development and production. In order to adequately protect this unique area, we urge the Corps to do more to reduce and minimize adverse environmental impact to the Refuge and its resources. As outlined below, we request that the Corps consider a new alternative that would accomplish this by eliminating the East Pad, or moving it farther from the Refuge. Secondly, this new alternative should move the permanent drilling and processing facilities away from the eroding Beaufort Sea coastline and farther from the rich ecological zone where land meets sea that is so important to fish, wildlife, and people. Notably, the project area includes polar bear critical habitat designated by the U.S. Fish and Wildlife Service under the Endangered Species Act. Alternatives Development and Screening 552 Because of the high reservoir pressures at Point Thomson, the DEIS states that a blowout or uncontrolled spill from production may result in a greater discharge rate than might be experienced elsewhere on the North Slope. The probability of small or medium sized spills is relatively high, based on historic North Slope spill data and "while highly unlikely, a very large spill event would be catastrophic and could be exacerbated by environmental conditions that could enhance the spread of spilled materials or interfere with response and cleanup" (DEIS ES-61 and 2-119). Drill pads and processing facilities need to be moved farther away from the shoreline to reduce risks of environmental damage to the nearshore and marine ecosystem from major spills. Contaminated Sites and Spills 553 **Summary of Concerns on the Permit Application:** This public comment timeframe is premature and inappropriate with respect to the Public Notice of the permit application for public review and comment on the Corps' authorizations under Section 10 of the Rivers and Harbors Act, and Section 404 of the Clean Water Act, including review of whether this project complies with the Section 404(b)(1) Guidelines, the Public Interest Review, and compliance with other laws and regulations. Public comments on the permit should not be undertaken until the Final EIS is completed. At this time, the public does not have before it the refined project, including additional mitigation measures or modifications that will be necessary to address the public interest and other requirements. It is essential that the public have before it the Corps' analysis and selection of the environmentally preferred alternative before commenting on the project's permit. The menu approach to alternatives presented in the DEIS (see p. ES-63) does not identify or provide the environmentally least damaging alternative, nor the environmentally preferred alternative. Our analysis of ExxonMobil's proposed project, analyzed as DEIS Alternative B, indicates that it would not meet the criteria for such an alternative. The public needs to have adequate information on which to provide comment on the permit. We formally request that the public comment period on the permit application be suspended until the FEIS is completed or, at a minimum, that it be re-opened for another 30 days to public comment once the FEIS is completed. This is a complex project proposal for a unique	552 The Arctic Refuge is a protected area; however, the area outside the refuge is state land, which is leased for the purpose of oil and gas development. Through the NEPA process, public interest review, and the 404(b)(1) Guidelines analysis, the Corps will take many factors into consideration, including minimizing impacts, before making a final decision on the location of the East Pad. The Corps is not considering an alternative that does not include an East Pad. This alternative (Concept 6) was eliminated from detailed consideration for not meeting the purpose and need of the project. The language in Section 2.2.4.2 has been supplemented to make this decision clearer. Without the ability to drill wells from the vicinity of the proposed East Pad, that Applicant would not be able to access eastern resources that have already been identified in approximately one-third of the Thomson Sand Reservoir. A well from the Central Pad would have to reach more than 30,000 feet, which is technologically infeasible. Reduced access to the eastern portion of the reservoir would limit the Applicant's ability to continue evaluation and delineation activities, including fully delineating the eastern edge of the reservoir, testing connectivity with the central portion of the reservoir, and fully evaluating the Thomson Sand oil rim and Brookian Group sandstones hydrocarbons. 553 A blowout would typically occur while drilling through the producing zones of the reservoir. For the two wells drilled in 2009-2010, seasonal restrictions were placed so that drilling could not occur during breakup or open water. The same restrictions would presumably be imposed on the proposed wells. Therefore, the location of the pads at the coast versus inland would not make a difference relative to impacts on the shoreline and marine waters. The difference in location could make a difference if a large to very large spill during production occurred during breakup or when the sea ice is absent. However, as stated in the EIS, the likelihood of such a spill is very low. Further, there are two wells already completed on the PTU-3 Pad that could not be moved. The Corps is taking these factors into consideration, along with other issues relevant to pad location, in assessing the alternatives to determine the environmentally preferred alternative.

Comment	Response
	554 The Corps will consider multiple factors, such as impacts to the environment identified during the NEPA process, the project purpose, practicability (as part of the 404[b][1] Guidelines analysis), public interest determination, and mitigation options, when making its final permit decision. See also the responses to Comments 561, 562, and 563. 555 The Draft EIS acknowledged the presence of offshore development, identified OCS activity as a reasonably foreseeable future action (see Table 4.2-2; Category, Oil/Gas Exploration; Unit or Area, Beaufort Sea [OCS]; Participating Area, Camden Bay [Sivulliq/Hammerhead]), described potential activities of the other projects based on best available information, and discussed the cumulative impacts within each of the resource sections as appropriate. Because of the location of the Point Thomson Project (onshore with associated coastal and marine activity) the project was found to have minimal impacts to the marine environment, and thus minimal cumulative impacts associated with reasonably foreseeable future OCS projects. During the Draft EIS comment period, Shell provided the Corps with additional general information regarding their anticipated OCS exploration activities. The additional information provided by Shell has been incorporated into the Chapter 4 description of potential OCS activity. The Corps reviewed the cumulative impact sections of Chapter 5 and believes that, even with this additional general information, the cumulative impact discussions in the individual resource sections of the EIS are sufficient, based on best available information of reasonably foreseeable future actions in the Beaufort Sea OCS. Where appropriate, clarifying statements have been added in the Final EIS.

Comment	Response
	556 As noted in Section 5.10, Terrestrial Mammals, impacts to caribou, regardless of the herd, were determined to be minor to moderate in magnitude and ranged from less than 1 percent of caribou potentially disturbed under Alternatives B and E to 14 percent under Alternative C due to the gravel access road. The impacts under Alternative C would primarily occur in the western portion of the study area and would mainly affect the Central Arctic and Teshekpuk Herds. The Porcupine Herd is defined as calving east of the Canning River and their overall range typically overlaps with a very small portion of the eastern part of the study area (see Figure 3.10-6). Therefore, impacts to the Porcupine Herd would likely be even less than 1 percent of the herd disturbed. The subsistence impact analysis considered the conclusions of the biological analysis that the project would not result in large scale changes in migration and that impacts would primarily be limited to local in geographic extent. Therefore, the majority of impacts for subsistence users would occur for residents who travel to the project area for caribou hunting and could experience reduced success in that area. According to available data, Kaktovik is the primary community that uses the project area for caribou harvesting activities. The conclusions of the terrestrial mammals impact analysis (Section 5.10) does not indicate that the project would result in changes to the migration of the Porcupine Herd or Central Arctic Herd, and therefore impacts for subsistence users outside the project area, such as those from Nuiqsut, Anaktuvuk Pass, or Arctic Village, would not occur. 557 Estimates of how much gas condensate, oil, or natural gas are not available for public release partly because the information is proprietary and partly because the intent of the proposed project is to further delineate and determine connectivity within the reservoir to estimate what quantities may be accessible for recovery. 558 The Corps believes that the EIS sufficiently discussed the geologic uniqueness of the Point Thomson reservoir. The Corps also does not see the need to describe the use of nitrogen or carbon dioxide to maintain pressure in the reservoir when the proposal is to cycle the natural gas back into the reservoir, not to extract it. The description of full field development is based on the best available information. Part of the Applicant's stated purpose for the proposed project is to further delineate the reservoir so that the Applicant can better understand, and thus define, a full field gas development project. Moreover, at this time, there is no gas pipeline to transport gas to market. Therefore, full field development is appropriately considered a reasonably foreseeable future action, as described in Section 4.2.3.3, Relevant Past, Present, and Reasonably Foreseeable Actions

Comment	Response
	Considered in Cumulative Impacts Analysis.
	559 The description of full field development is based on the best available information. Part of the Applicant's stated purpose for the proposed project is to further delineate the reservoir so that the Applicant can better understand, and thus define, a full field gas development project. Moreover, at this time, there is no gas pipeline to transport gas to market. Therefore, full field development is appropriately considered a reasonably foreseeable future action, as described in Section 4.2.3.3, Relevant Past, Present, and Reasonably Foreseeable Actions Considered in Cumulative Impacts Analysis. 560 The overall purpose of this project is to produce liquid hydrocarbons from the Thomson Sand Reservoir and further evaluate and delineate the reservoir and evaluate the Brookian Group sandstones. As far as this NEPA process and the Corps is concerned, the question at hand is whether or not to issue a permit allowing the filling of wetlands and other waters of the U.S. The Corps' requirements regarding permit application decisions does not require a permittee to hold title to the land (or by extension, have valid leases) for the Corps to make a decision to either approve or deny a permit. The State of Alaska and the Applicant have reached a settlement agreement since the Draft EIS was released. 561 **Mitigation:** Each of the resource sections in the EIS outlines environmental commitments proposed by the Applicant and mitigation measures required by the regulatory agencies that are designed to reduce and minimize impacts. Mitigation measures are also discussed in Chapter 4. **Visual Study Area:** The Visual Assessment in Appendix N includes a primary study area of 20-mile radius and a secondary study area that is all areas from which the project lights or plumes theoretically could be seen in good conditions. Both areas are addressed, including impacts to the Mollie Beattie Wilderness within the secondary area. See Sections 4.9 and 4.10 of Appendix N. **Combined Effects:** Regarding combined effects of noise and visual impacts, the Recreation and Arctic National Wildlife Refuge sections in the EIS address combined effects and are more appropriate for combined effects than the Visual Resource Assessment, which focuses solely on the visual environment. **Fata Morgana/Mirage:** A sentence has been added to reference Fata Morgana in Section 3.2.2.9, Atmospheric Effects/ Mirage, of Appendix N. New text in Section 4.1.3 acknowledges the potential that various atmospheric effects could alter the visual contrast ratings at any given time: "The rating also is done without regard to Arctic atmospheric effects/mirages in the study area (see sub-section 3.2.2.9).

Comment	Response
	Mirages have the potential to make project components appear larger/taller than they normally would or that have the potential to visually lift objects from below the horizon to above the horizon. Low cloud, fog, and ice fog have the potential on one hand to obscure project components and on the other to highlight project light sources or project them skyward. Blowing snow also would limit views. The contrast ratings assume unobscured views, generally a worst-case scenario for impact assessment." **Numbers of Users**: Regarding the number of people who might be affected, the EIS makes a general estimate based on the best data available, which is limited data. Users of more distant areas of the Arctic Refuge are acknowledged in the text, as are the near daily commercial overflights to and from Kaktovik. Other commenters felt the estimated numbers were too high. No change has been made to the user numbers stated in the EIS. 743 RFI #52 has been included in Appendix D of the Final EIS.

Comment	Response
	562 The Corps has no jurisdiction and there is no precedence to impose a "buffer" on state land around the Arctic Refuge. Language has been added to Section 2.2.4.2, Concept 6: Limit Activity Near the Arctic Refuge, to help the reader understand why Concept 6 would not meet the purpose and need of the project and has therefore been eliminated from detailed consideration. The State of Alaska verified that a reach of more than 30,000 feet, which would be needed in order to access the eastern portion of the reservoir from the Central Pad, is technologically infeasible. Without the ability to drill wells from the vicinity of the proposed East Pad, the Applicant would not be able to access resources that have already been identified in approximately one-third of the Thomson Sand Reservoir. This conclusion is based on the general aerial extent of the reservoir, which has been determined through delineation data gathered from the 16 exploration wells drilled since hydrocarbons were first discovered in the Point Thomson area in 1975 (Appendix D, RFI 63; Hartz et.al. 2008). Reduced access to the eastern portion of the reservoir would limit the Applicant's ability to continue evaluation and delineation activities, including fully delineating the eastern edge of the reservoir, testing connectivity with the central portion of the reservoir, and fully evaluating the Thomson Sand oil rim and Brookian Group sandstones. Finally, reduced access and the inability to delineate, evaluate, and ultimately recover hydrocarbons from the eastern portion of the reservoir would hamper the collection of data needed to develop a strategy for full field development. All-season access to the East and West Pads is preferred because delineation would occur year-round. "Delineation" for the Point Thomson Project would consist of evaluating the connectivity of the reservoir. To determine connectivity, gathering lines would need to be built and production and cycling occur. Condensate production would occur during non-ice road seasons and therefore there would need to be other access to the east and west pads. The coastal location of the pads presents a trade-off of impacts and the purpose of the project. The Applicant's Technical Brief #1 stated that a "Pad location further inland from the coast will increase the throw on all wells and potentially preclude the ability to reach portions of the reservoir necessary for full field development. This may lead to additional pads being needed in the future to reach bottomhole targets that cannot be reached from a pad that has been located further inland." In other words, a trade-off of moving pads inland would be the potential future need for additional pads closer to the reservoir (i.e., along the coast) in order to reach bottomhole targets, given the present 13,000-foot limit of extended-reach drilling, which has been independently verified by the State of Alaska.

Comment	Response
  permanent in-field roads and provide for further pad consolidation, and exclude construction of permanent roads to the satellite pads at least during the exploratory/delineation phase. Based on the information contained in the DEIS including its Appendices, better economic and technical information is necessary in order to evaluate the lack of feasibility and practicability of an alternative of removing the East Pad to achieve the goals of limiting activity and permanent infrastructure near the Arctic Refuge. Alternatives Development and Screening 563 The technical information upon which Concept 6 was dropped from consideration as a DEIS alternative, particularly the elimination of East Pad, is insufficient for this purpose. An independent analysis of this information, instead of information provided by the applicant is appropriate. The DEIS stated, "current directional drilling technology in reservoir conditions similar to those found in the Thomson Sands only has a proven reach of approximately 13,000 feet (Appendix D, RFI 63)" [9] (DEIS at 2-8). While elsewhere in the DEIS it acknowledges the limitations of its knowledge of the Point Thomson reservoir conditions, the assertion of a maximum "proven reach" needs further explanation from an objective source. In the discussion of minimization of coastal infrastructure as part of the Draft Section 404(b)(1) Evaluation, the Corps further notes that ExxonMobil's information regarding the limits of horizontal reach remains proprietary and was not made available to the Corps: *"Based on currently available public information, however, it is not possible to determine how far inland the drilling pads may be moved while still allowing sufficient access to the reservoir to fully delineate and develop the hydrocarbon resources of the Thomson Sands. The proposed project, is, in part, intended to provide additional reservoir information in support of a more comprehensive development plan. Current LRD drilling technology in reservoir conditions similar to those found in the Thomson Sands reservoir has a proven horizontal reach of approximately 10,000 to 13,000 feet (Appendix D, RFI 63 of the Draft EIS. Based on proprietary information not currently available to the Corps, the Applicant has determined that the drilling reach from the proposed pads in Alternatives B and E would provide adequate access to drilling targets and would be sufficient to fully delineate and develop the Thomson Sands reservoir (Appendix D, Technical Brief 1 of the Draft EIS)."* [10] The Corps notes that additional economic information upon which to evaluate practicability of the various alternatives is still needed. (Appendix C at 20). Exxon's confidential information regarding the limits of horizontal reach should be made available to the Corps so it can fully assess this alternative. It appears that the Viability decision was based on ExxonMobil's assertion that without East Pad it could not achieve its purpose of "fully delineating and developing the reservoir" because it would not access "one-third of the known gas resource" (Appendix C, p. 9). This muddles the stated need for further delineation wells (i.e. exploratory phase work proposed to be done from the East Pad) by combining it with development of the reservoir. It is also unclear whether this refers to the gas condensate, or the "full-field development" of the [9] 13,000 feet = 2.46 miles [10] DEIS, Appendix C, p. 24.	563 The Corps is not looking at an alternative that eliminates or moves the East Pad to the west. This alternative (Concept 6) was eliminated from detailed consideration for not meeting the purpose and need of the project. The language in Section 2.2.4.2, Concept 6: Limit Activity Near the Arctic Refuge, has been supplemented to make this decision clearer. Without the ability to drill wells from the vicinity of the proposed East Pad, the Applicant would not be able to access eastern resources that have already been identified in approximately one-third of the Thomson Sand Reservoir. A well from the Central Pad would have to reach more than 30,000 feet, which is technologically infeasible. The State of Alaska verified that the horizontal reach limit of long reach directional drilling in high pressure and depth reservoirs such as the Thomson Sand Reservoir is approximately 13,000 feet. Reduced access to the eastern portion of the reservoir would limit the Applicant's ability to continue evaluation and delineation activities, including fully delineating the eastern edge of the reservoir, testing connectivity with the central portion of the reservoir, and fully evaluating the Thomson Sand oil rim and Brookian Group sandstones hydrocarbons.

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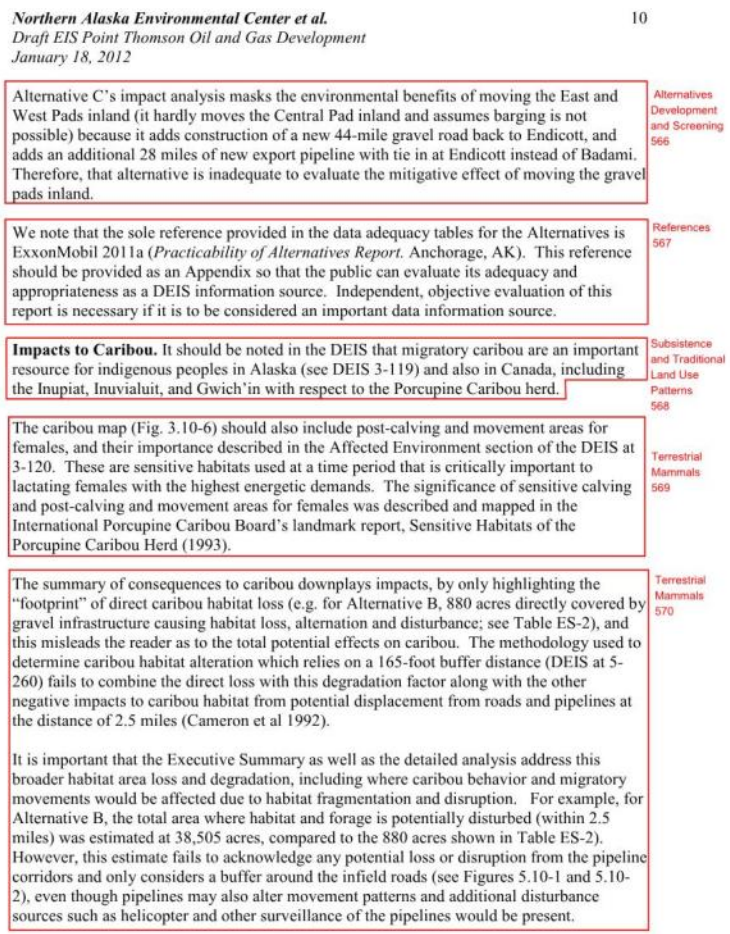
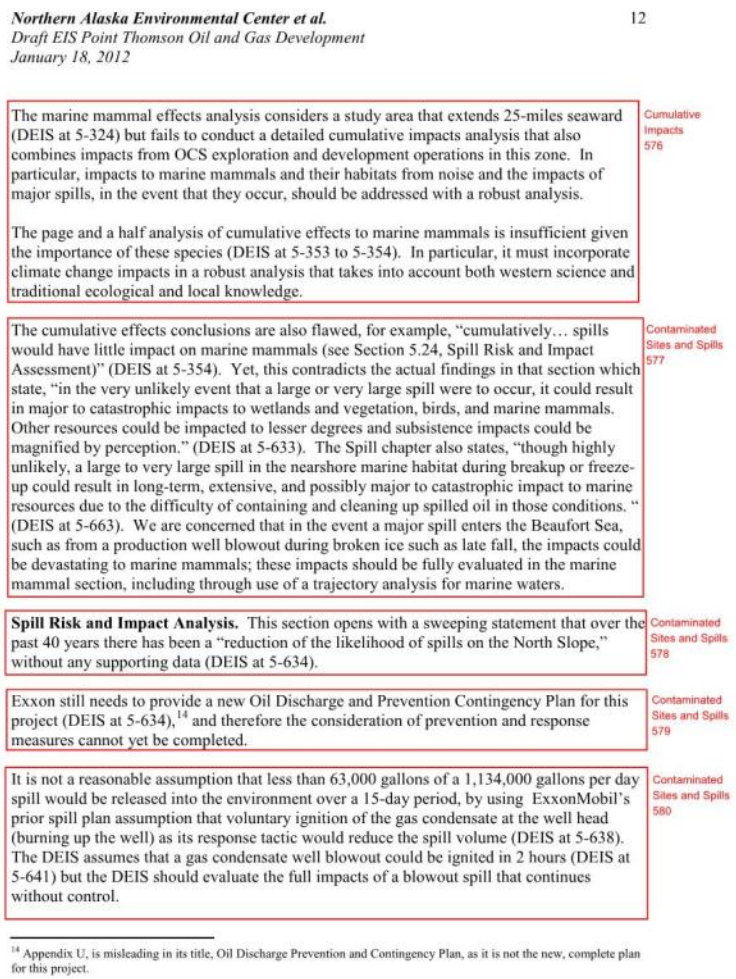
  natural gas field for which not all future infrastructure needs are mapped and environmental impacts not comprehensively addressed here. "The wells on the East and West Pads would be used initially to delineate and evaluate the reservoir, and to determine whether the rim of oil surrounding the gas reservoir is viable for production." (Appendix C, p. 12). The DEIS documents that the actual hydrocarbon production from this project (gas condensate) would be viable and technically feasible without the East Pad and with drill sites placed further inland, (see DEIS, Table 2.2.2). For this project, ExxonMobil has not yet fully delineated the oil and gas condensate resources. ExxonMobil plans to produce the gas condensate, with "initial production targeted at 10,000 bpd from a central well, while maintaining the ability to produce natural gas in the future should the required infrastructure be put in place to transport natural gas to market." (DEIS at 1-10). The Corps should not approve new construction for the East Pad nearest the Arctic Refuge, nor its connecting road, at least until its need as a production site is definitively established. The detailed documentation in Appendix D provided by ExxonMobil indicates that there is not a confirmed need for this drill site. Therefore, construction of gravel pads and roads at this phase is unnecessary – the project calls for drilling more *exploratory/delineation wells* to evaluate the commercial viability for producing crude oil and natural gas. In consideration of the alternative which is least damaging to the environment, including its services, the simple factor of direct gravel fill "footprint" quantity is an insufficient measure of the full effects to wetlands and other aquatic resources at stake here. Although there are existing gravel pads from earlier exploratory drilling placed decades ago, these may not be the most favorable location to minimize adverse impacts for the long-term Point Thomson project –including full-field natural gas exploitation–given their location next to the eroding sea coast as well as the fact that they are in the zone of highest wildlife uses including caribou insect relief, and high subsistence use. Furthermore, the zone of impacts is larger than the direct "footprint" and the proposed pad shoreline locations risk higher impacts to the nearshore waters resources including bird, marine mammal, and fish migrations. Alternatives and Screening 564 **Other Alternative Considerations.** In the DEIS, all project alternatives consider permanent gravel drill sites for the East and West Pads. However, the DEIS describes that the satellite drill sites (i.e. East Pad and West Pad) are proposed as delineation wells at this time,[11] and the justification of proven need for future development has not been provided in the DEIS. Similarly, the need for the infield gathering lines to the East and West Pads has not yet been documented based on proven production needs at this time.[12] Therefore consideration of an alternative without those 2 permanent gravel fill pads, along with the connecting permanent gravel roads and gathering lines, is appropriate. Alternatives Development and Screening 565 [11] "The wells on the East and West Pads would be used initially to delineate and evaluate the reservoir, and to determine whether the rim of oil surrounding the gas reservoir would be viable for production." DEIS at 2-18. [12] See DEIS at 2-19.	564 The State of Alaska has verified that the well proposed on the East Pad would be needed for production. It is referred to as an exploratory/delineation well; however, it would not be a traditional one season exploratory well. The testing needed for commercial viability is long-term testing, which would be done during production of gas condensate. Production would occur year-round and therefore the East (and West) Pad would need to be gravel with gathering lines connecting them to the central processing unit. Long-term testing during production would determine connectivity of the reservoir. Through this testing the applicant would be able to determine, with greater accuracy, the commercial and development potential of the reservoir. Delaying the construction of the East Pad would not be reasonable because it is needed to conduct further testing of the reservoir. The coastal location of the pads presents a trade-off of impacts and the purpose of the project. The Applicant's Technical Brief #1 stated that a "Pad location further inland from the coast will increase the throw on all wells and potentially preclude the ability to reach portions of the reservoir necessary for full field development. This may lead to additional pads being needed in the future to reach bottomhole targets that cannot be reached from a pad that has been located further inland." In other words, a trade-off of moving pads inland would be the potential future need for additional pads closer to the reservoir (i.e., along the coast) in order to reach bottomhole targets, given the present 13,000-foot limits of extended-reach drilling, which has been independently verified by the State of Alaska. 565 The Draft EIS referred to the wells as delineation wells, but in order to determine the connectivity of the reservoir, these wells would need to be put into production. Production would occur year-round; therefore, the East and West Pads would need to be gravel with gathering lines connecting them to the central processing unit. Long-term testing during production would determine connectivity of the reservoir. Through this testing the applicant would be able to determine, with greater accuracy, the commercial and development potential of the reservoir.

Comment	Response
	566 Alternative D also has the pads moved inland and does not have the large gravel roads. The Corps was able to evaluate differences in pad location using both Alternatives C and D in comparison to Alternatives B and E. 567 The Applicant's practicability of alternatives report has been included as Appendix W of the Final EIS. 568 As noted in the EIS, Section 5.10, Terrestrial Mammals, impacts to caribou, regardless of the herd, were determined to be minor to moderate in magnitude and ranged from less than 1 percent of caribou potentially disturbed under Alternatives B and E to 14 percent under Alternative C due to the gravel access road. The impacts under Alternative C would primarily occur in the western portion of the study area and would mainly affect the Central Arctic and Teshekpuk herds. The Porcupine Herd is defined as calving east of the Canning River and their overall range typically overlaps with a very small portion of the eastern part of the study area (see Figure 3.10-6). Therefore, impacts to the Porcupine Herd would likely be even less than 1 percent of the herd disturbed. The subsistence impact analysis considered the conclusions of the biological analysis that the project would not result in large scale changes in migration and that impacts would primarily be limited to local in geographic extent. Therefore, the majority of impacts for subsistence users would occur for residents who travel to the project area for caribou hunting and could experience reduced success in that area. According to available data, Kaktovik is the primary community that uses the project area for caribou harvesting activities. The conclusions of the terrestrial mammals impact analysis (Section 5.10) does not indicate that the project would result in changes to the migration of the Porcupine Herd or Central Arctic Herd, and therefore impacts for subsistence users outside the project area, such as those from Nuiqsut, Anaktuvuk Pass, or Arctic Village, would not occur. 569 Figures 3.10-8 and 3.10-9 identify caribou group size and location and movement density during the post-calving time period. Additionally, Figures 5.10-3, 5.10-6, 5.10-9, and 5.10-12 identify locations of Central Arctic Herd caribou movement densities in June, July, and August. The Corps re-evaluated these figures and other available post-calving data and determined that the data presented in the Draft EIS are adequate for evaluating post-calving caribou movements. Data showing movement areas specifically for female caribou is inferred in Figures 3.10-8 and 3.10-9. A discussion of the importance of caribou post-calving areas has been added to Section 3.10.3.2, Caribou, of the Final EIS.

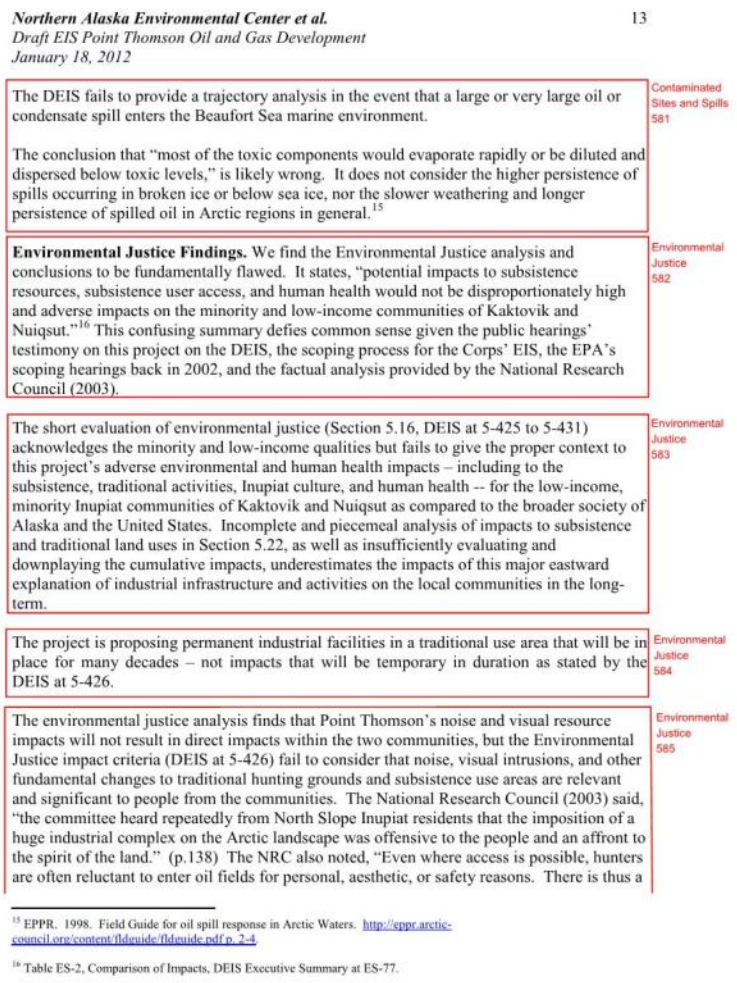
Comment	Response
	570 Table 5.10-2 identifies direct habitat loss (footprint and buffer) and indirect habitat loss up to 2.5 miles away from available habitat and foraging areas that would potentially be disturbed. The 2.5 mile distance is broad enough to include behavioral response buffers that cover a range of possible disturbances, including noise and visual. The buffers used are based on known displacement distances evaluated in multiple studies of caribou behavioral responses to disturbance (Dau and Cameron 1986; Cameron et al. 1992, 1995; Wolfe 2000; Noel et al. 2004; Haskell et al. 2006; Haskell and Ballard 2008). Potential impacts from pipeline corridors are discussed for each alternative under Habitat Fragmentation. The EIS notes that the pipeline heights (minimum of 7 feet) are greater than the minimum 5-foot height that has been recommended to prevent blockage of caribou movements during summer or winter (Cronin et al. 1994, Lawhead et al. 2006). Therefore, it is not expected that pipelines would alter movement patterns of caribou when they are not placed in close proximity to roads. Section 5.10, Terrestrial Mammals, of the Final EIS was updated to note that aircraft could disturb caribou during routine maintenance and surveillance of pipelines.

Comment	Response
  The analysis of potential disturbance to caribou from project construction and operation (see Table 5.10-4, p. 5-271) also contains flawed estimates of impacts to calving and post-calving because it appears to be based on point counts and fails to address the entire habitats needed by females and their calves as they move around during their entire calving and post-calving periods. The map shows a concentration of 1001-5000 caribou out in the Beaufort Sea north of Flaxman Island; the significance of this caribou use (if this is correct information) and the obstacles the new infrastructure might pose to such use in the future should be assessed. Terrestrial Mammals 571 The Point Thomson region comprises the least impacted area of Central Arctic Herd caribou calving habitat except for that located within the Arctic Refuge on the North Slope today. This context regarding potential long-term effects on the habitat for this herd should be addressed, particularly cumulative impacts of oil and gas development andclimate change. Terrestrial Mammals 572 **Impacts to Polar Bears.** The quantitative data and analysis approach used to estimate loss of polar bear critical habitat may underestimate long-term effects on the bears and their habitats. As permanent, year-round infrastructure and activities take place in the area, the reactions of bears may not be similar to past years when remediation activities were occurring (see DEIS at 5-325). The Point Thomson area has higher concentrations of known denning bears than at existing oil field areas, and interactions between humans and bears could prove increasingly deadly, but plans incorporating this factor do not seem to have been taken into account. Specific evaluation of the bear interaction plan should be addressed by the DEIS to consider project features or alternatives that could reduce lethal risks to bears and humans. Marine Mammals 573 By using only the number of recorded polar bear dens within 1 mile of proposed project features (Sec. 5.11.1.2, #5, DEIS at 5-325), instead of evaluating all known polar bear denning critical habitat (including barrier islands) within 1 mile of project features, is a method that will underestimate the potential displacement of denning polar bears or den abandonment from the project over its life. This is due to the fact that the actual locations of most denning bears are unknown and it is a method that underestimates the denning habitat loss resulting from the project as shown in Table 5.11-2 (DEIS at 5-328). Marine Mammals 574 **Impacts to Beaufort Sea Resources.** We greatly appreciate the noise study that was done, but insufficient information is provided for evaluation of changes to sound levels in the marine environment.[13] A specific study to provide baseline assessment of underwater noise levels in the marine environment should be done to address potential project-related noise to bowhead whales and other marine life, as well as the cumulative effects. For example, the sound of directional drilling under the ocean needs to be analyzed. Northstar monitoring found a significant sound attributed to drilling, as the Noise Technical Report notes (see Appendix O at 157). All of the onshore, as well as below ocean sounds, need to be considered in an full evaluation of the cumulative impacts of drilling that would affect the marine environment, including from activities on nearly OCS leases. Noise 575 [13] "Existing available marine noise data from similar North Slope oil and gas development projects was used to assess potential project-related noise in the marine environment and therefore, underwater noise levels were not measured as part of the baseline acoustic data collection." Noise Technical Report, Appendix O, DEIS at 3.	571 The analysis of potential disturbance to caribou from project construction and operation used ADF&G and other data made available to the Corps. The purpose of Table 5.10 4 is to identify the average number of caribou potentially occurring within 2.5 miles of Alternative B that could be disturbed and displaced. The intent of this table is not to identify important habitat for females and calves outside of the 2.5 miles. Impacts to habitat outside of the 2.5-mile buffer are not included in the analysis based on literature that has evaluated displacement distances in studies of caribou behavioral responses to disturbance (Dau and Cameron 1986; Cameron et al. 1992, 1995; Wolfe 2000; Noel et al. 2004; Haskell et al. 2006; Haskell and Ballard 2008). The photocensus data used to show caribou herd sizes was provided to the Corps by ADF&G. An explanation of the point location of 1,001 to 5,000 caribou north of Point Thomson (not north of Flaxman Island as suggested in this comment) was not provided by ADF&G and the Corps cannot speculate on the accuracy of the location or the behavior of the caribou in the group. The potential for project infrastructure to affect the movements of caribou was analyzed by using the data showing the density of caribou movements shown on the same figures. 572 The EIS notes that the Point Thomson Project is located in a region of the North Slope that currently has a minimal amount of oil and gas activity compared to the existing oil production areas to the west. The potential cumulative impacts to caribou from Point Thomson in conjunction with past, present, and reasonably foreseeable future oil and gas projects is discussed in Section 5.10.8.2, Cumulative Effects. 573 The impact assessment for polar bears does evaluate potential long-term effects from year-round infrastructure and activities. As suggested in the comment, the Corps conducted a more thorough review of the Applicant's Wildlife Interaction Plan and added additional text to the Final EIS in Section 5.11.3.1, Alternative B: Construction. The Polar Bear and Wildlife Interaction Plan for the Point Thomson Project is an appendix to the Biological Assessment for the Polar Bear, Spectacled Eider, Steller's Eider, and Yellow-billed Loon (Appendix M). 574 The analysis of locating known polar bear dens within 1 mile of proposed project infrastructure listed in the Draft EIS on page 5-325 in Section 5.11.1.2, Habitat Alteration (Disturbance), was not conducted in the Draft EIS. This analysis was erroneously left in the document. Reference to this analysis has been removed from the Final EIS. The analyses that were conducted to evaluate potential impacts to polar bears from the proposed project are appropriate and were based on designated polar bear critical habitat.

Comment	Response
	575 A review of published reports was conducted to determine the availability of baseline underwater ambient noise measurements for the nearshore waters of Point Thomson. While ambient noise data specifically for Point Thomson do not exist, various acoustic monitoring efforts off the North Slope were identified. As stated in Section 3.20.2, Review and Adequacy of Information Sources for Noise, discussions with acousticians involved in acoustic monitoring in the Beaufort Sea confirmed that the best available data for shallow water ambient noise measurements near Point Thomson are associated with acoustic monitoring of industrial sounds for BPXA's Northstar development project. The Liberty development project was also considered to be a suitable candidate for comparison because, like Northstar and Point Thomson, Liberty occurs in shallow waters (less than 66 feet in bottom depth). Point Thomson shares similar characteristics with Northstar and Liberty, specifically shallow water and topographical characteristics. The Corps determined that the available data from Northstar and Liberty were accurate, timely, and sufficiently similar to warrant direct comparison to the Point Thomson project area and concluded that these data should be used for assessing the potential impacts of the Point Thomson project on the marine soundscape. Drilling within the hydrocarbon zone at Point Thomson would occur during the winter months when most marine mammals are not in the area (see Sections 3.11 and 5.11, Marine Mammals, for details). Because the Point Thomson area is a shallow water environment with islands, sound transmission is limited. The Northstar EIS found that industrial sounds are unlikely to be detectable far enough offshore to be heard by spring-migrating whales, but if so, the received levels would be weak and very unlikely to elicit behavioral reactions. Bowhead and Beluga whales would not be affected by drilling noises because of the topography of the area, and noise from vessels would still be the predominant anthropogenic noise in the environment. Aspects of noise impacts to marine mammals from the proposed project are discussed in both the marine mammal and noise sections of the EIS. Cumulative noise impacts were addressed by using the best available information regarding the type of activities anticipated for OCS exploration and development; specific data and types of activities that may occur simultaneously during OCS exploration and development are currently unknown and given the minor impacts of noise on marine mammals anticipated as a result of this project, the level of analysis is appropriate.

Comment	Response
	576 The cumulative impacts analysis does include an evaluation of OCS activities based on the past, present, and reasonably foreseeable future actions presented in Chapter 4. The marine mammals section does not evaluate the potential impacts of spills because spills impacts are addressed in Section 5.24, Spill Risk and Impact Assessment. The Corps has determined that the likelihood of cumulative impacts associated with very large spills is extremely small, and no cumulative impacts from very small to large spills are expected (see Section 5.24.13.2, Cumulative Impacts). Cumulative noise impacts were addressed by using the best available information regarding the type of activities anticipated for OCS exploration and development; specific data and types of activities that may occur simultaneously during OCS exploration and development are currently unknown and given the minor impacts of noise on marine mammals anticipated as a result of this project, the level of analysis is appropriate. Climate change impacts to marine mammals were discussed in the context of cumulative impacts (Sections 5.11.8.1 and 5.11.8.2) because of the potential for climate change impacts to affect marine mammals cumulatively with other anthropogenic impacts. The EIS presents a meaningful analysis of climate and cumulative impacts on marine species, given the climate change information currently available and the extent of information available on reasonably foreseeable future actions. Traditional ecological and local knowledge is incorporated into Section 5.22, Subsistence and Traditional Land Use Patterns. 577 As the commenter points out, the Corps has presented the potential consequences of an extremely unlikely event of a large to very large spill. The conclusions of the cumulative impacts from spills, however, are not flawed, based on the extremely small likelihood of a very large spill occurring. The Corps has taken into consideration the likelihood of a spill in determining the cumulative impacts associated with spills and has concluded that the project would not add or interact with potential spill impacts (which would likely also be extremely unlikely) from other actions. Section 5.24.11.8, Marine Mammals, addresses impacts of spills on marine mammals. 578 The statement at the beginning of Section 5.24, Spill Risk and Impact Assessment, "Over the past 40 years, the combination of stricter agency regulations, improving industry operating practices, and advancements in spill control technology have resulted in a reduction of the likelihood of spills on the North Slope," is a professional judgment based on the following: improved technology, including advances in the ability to use long-reach directional drilling to access offshore reservoirs from land-based facilities, better engineering design, greater stress on clean operations, and greater awareness of

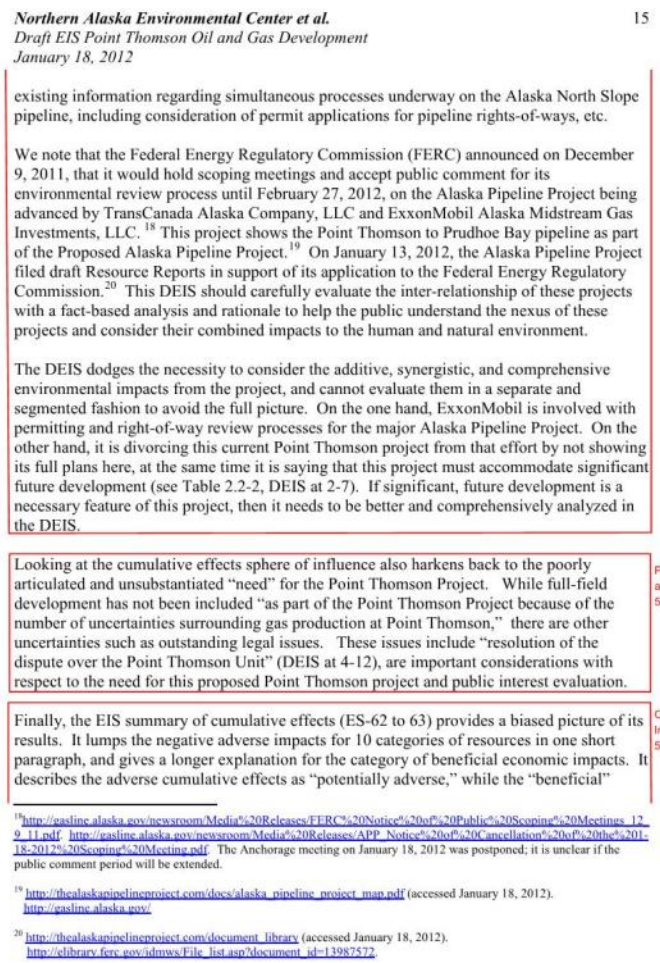
Comment	Response
	spill prevention, reporting and cleanup on the part of all the oil field personnel. We have modified this statement in the Final EIS (introduction to Chapter 5.24, Spill Risk and Impact Assessment) by adding "likely" before "resulted." See Section 3.24.3, Overview of North Slope Spill History, for a more detailed assessment of North Slope spill data. 579 The amended ODPCP that would be prepared for the proposed project, as required by 18 AAC 75.415, would be reviewed and approved, if deemed appropriate, by the ADEC. The Corps does not have the authority to determine the adequacy or suitability of the spill prevention and response measures for the Point Thomson Project. The approved ODPCP for the existing wells at the Point Thomson site was included in the EIS as background information for assessing potential impacts due to spills. However, an amended ODPCP is not required for the EIS. 580 The spill scenario presented in Section 5.24.2.3, Phases of Oil Field Development, is taken from the ODPCP for the existing wells at the Point Thomson site, which are similar to those proposed for the project. The ODPCP was approved by the ADEC, and therefore, it is appropriate to use for assessing impacts in the EIS.

Comment	Response
	581 Weathering is described in Section 5.24.4.1, Weathering. As indicated in this section, weathering depends on environmental conditions. Weathering may be generally slower in the Arctic, but that does not mean these processes do not occur. The quoted text was taken from a discussion of impacts on marine water quality (Section 5.24.11.4, Water Quality) and is accurate. The EIS does consider Arctic conditions and, relative to sea ice, states in Section 5.24.5.2, Fresh or Marine Water: "Weathering processes in fresh or marine water are generally similar and mainly impacted by seasonal ice cover, which could greatly slow weathering in both systems (BLM 2004)." An aerial trajectory analysis for both oil and condensate well blowout events was included in the ODPCP (Appendix U) for the two wells drilled in 2009-2010. These wells are representative of the type of wells that would be drilled for the proposed project, and it is assumed that there would be similar seasonal drilling requirements to reduce the risk of a discharge to open water. The Applicant's amended ODPCP, required for the proposed project, would further address spill scenarios and mitigation and would be reviewed for consistency with 18 AAC 75 by the ADEC. 582 As discussed in Section 3.16, Environmental Justice, the Corps' evaluation of the potential for a disproportionately high and adverse effect on minority and low-income populations was based on the CEQ guidance on environmental justice under NEPA (Environment Justice: Guidance Under the National Environmental Policy Act. Referenced as CEQ 1997a). The findings of the environmental justice analysis incorporated the impact evaluations for subsistence and traditional land use, socioeconomics (including community cohesion and culture), and human health (Section 5.22, Section 5.15, and Section 5.23, respectively). The environmental justice analysis also included consideration of qualitative information gathered through the tribal consultation and public participation process. Impacts to these resources were thoroughly evaluated in the EIS within each of the respective sections and findings were referenced and summarized within the context of environmental justice in Section 5.16. Based on the comment received, the Corps re-evaluated the environmental justice section and its conclusions, and maintains that the impacts identified within the subsistence and traditional land use, socioeconomics, and human health sections, individually or additively, do not support a finding of a disproportionately high and adverse effect. This finding is consistent with the CEQ guidance on environmental justice on which the Corps' analysis was based (CEQ 1997a). See also the response to Comment 585.

Comment	Response
	583 The environmental justice analysis was based on the impact evaluations for subsistence, socioeconomics (including community cohesion and culture), and human health (Section 5.22, Section 5.15, and Section 5.23, respectively). Impacts to these resources are thoroughly evaluated in the EIS within each of the respective sections and findings are referenced and summarized within the context of environmental justice in Section 5.26. The environmental justice section also indirectly includes findings from the visual aesthetics and noise impact assessments, because impacts to these resources were considered in the subsistence and traditional land use analysis. The subsistence and traditional land use analysis consisted of the best available information, state of the practice analysis of area user data, and thorough analysis of qualitative data based on other development areas on the North Slope. The subsistence analysis of the EIS recognizes that development of the project under any action alternative could lead to future expansion of the Point Thomson Project, which could result in increased impacts on subsistence use areas, reduced user access to traditional hunting areas, decreased resource availability, increased competition among subsistence users, and increased costs and time associated with harvesting subsistence resources. The discussion also includes analysis of reasonably foreseeable future actions that could add to these impacts by further expanding industrial facilities into existing subsistence use areas. The analysis of cumulative impacts to subsistence and traditional land use also notes that hunters are often reluctant to enter oil fields. 584 The environmental justice analysis correctly stated that all impacts identified in the subsistence and traditional land use analyses were found to be long term (greater than 2 years) in duration (see Sections 5.16.2, 5.16.3.1, 5.16.4.1). The discussion of temporary impacts on page 5-426 of the Draft EIS was intended to convey the methodology by which impacts identified were used to evaluate the potential for disproportionately high and adverse effects to minority and low-income communities. Text in the environmental justice analysis was modified to clarify the impact criteria used in the environmental justice analysis. This clarification does not alter the findings that minor impacts would not result in disproportionately high and adverse impacts on the minority and low-income communities of Kaktovik and Nuiqsut.

Comment	Response
	585 The environmental justice analysis used findings from the subsistence and traditional land use impact analysis, which used information, data, and observations of North Slope subsistence users. Within the subsistence and traditional land use impact analysis, noise and visual intrusions were considered for their effect on user access, avoidance, and resource availability. The Corps disclosed potential impacts to user access by harvesters and that subsistence activities could be impacted by any of the alternatives because residents may avoid the project area due to noise and human presence. The analysis of cumulative impacts to subsistence and traditional land use notes that hunters are often reluctant to enter oil fields. The findings of the NRC report were incorporated into the cumulative impacts analysis of many resource impact analyses in the EIS, including the socioeconomic and subsistence and traditional land use analyses, and have been fully considered by the Corps.

Comment	Response
	586 The discussion of potential impacts to resident employment within the environmental justice analysis is based on the employment analysis in Section 5.15, Socioeconomics. Within Section 5.15, the analysis of impacts to employment clearly states that "The past history of NSB resident employment in the oil industry on the North Slope suggest that despite efforts to encourage local employment, increased resident employment would likely be a minor and temporary positive impact on the NSB population." While not repeated in the environmental justice analysis, this same conclusion of minor and temporary benefits to resident employment was considered as one component of the environmental justice analysis. Text in the environmental justice analysis was revised to reflect this finding, but this revision does not change the overall conclusions of the environmental justice analysis. The Applicant's efforts to contract with local companies and to encourage local hire are likely to increase employment in the NSB and in the communities of Kaktovik and Nuiqsut, where these efforts are primarily being targeted. However, as stated in the EIS, these impacts are dependent on a wide range of factors and likely to be temporary and minor. Future employment at the village level cannot be predicted at this time. 587 See the response to Comment 583. 588 The description of full field development is based on the best available information. Part of the Applicant's stated purpose for the proposed project is to further delineate the reservoir so that the Applicant can better understand, and thus define, a full field gas development project. Maps at this stage would be speculative and would suggest a greater level of understanding of a future project that is not presently designed. 589 The Alaska Pipeline Project is included in the reasonably foreseeable future actions and the impacts are discussed within the cumulative impact sections. The Corps agrees that it is uncertain whether or when an export gas line would be built. It is still to be seen where the line would be located and by whom. Because of these unknowns, the discussion of the export gas line remains in the reasonably foreseeable future actions section of the EIS. The building of the gas line is a large undertaking that stands alone. The Point Thomson Project is proposed to extract condensate and oil. The proposed export pipeline would connect to TAPS. If a gas pipeline were to be built and resources from Point Thomson connected to it, then a gas line would have to be built from Point Thomson to tie in. That intermediary gas pipeline is shown as part of the Alaska Pipeline Project because the Applicant is a proponent of the project and therefore would want to connect Point Thomson to it.

Comment	Response
	590 The overall purpose of this project is to produce liquid hydrocarbons from the Thomson Sand Reservoir and further evaluate and delineate the reservoir and evaluate the Brookian Group sandstones. As far as this NEPA process and the Corps is concerned, the question at hand is whether or not to issue a permit allowing the filling of wetlands and other waters of the U.S. The Corps' requirements regarding permit application decisions does not require a permittee to hold title to the land (or by extension, have valid leases) for the Corps to make a decision to either approve or deny a permit. The State of Alaska and the Applicant have reached a settlement agreement since the release of the Draft EIS. 591 The Executive Summary section in question has been rewritten as follows: "Key Impacts/Issues • Potentially adverse cumulative effects were identified for coastal waters, hydrology, caribou, Arctic Refuge, environmental justice, visual aesthetics, cultural resources, and subsistence and traditional land use. • Potentially beneficial cumulative effects were identified to the economy."

Comment	Response
Northern Alaska Environmental Center et al. 16 *Draft EIS Point Thomson Oil and Gas Development* *January 18, 2012* cumulative effects do not have the appropriate qualifier. No data in the DEIS could be found that quantify "a potentially substantial percentage of total economically recoverable petroleum resources within the area of known reserves," which adequately provides a factual basis for determining the significance of condensate production in slowing the decline in oil production or how condensate would contribute a positive impact to the NSB's or State of Alaska's finances. While the DEIS indicates that "these beneficial economic effects would also be experienced by minority and low-income populations," the cumulative impacts discussion of adverse effects to resources such as cultural resources, subsistence and traditional land uses does not similarly include the fact that these would also disproportionately have negative effects on minority and low-income populations, despite the flawed conclusions of the DEIS. Thank you for this opportunity to comment. Please add us to your e-mail list for this project. Sincerely, Pamela A. Miller Pamela A. Miller Arctic Program Director Northern Alaska Environmental Center pam@northern.org Kristen Miller Government Affairs Director Alaska Wilderness League Kristen@alaskawild.org Bob Childers Executive Director Gwich'in Steering Committee bobchilders@mac.com Dan Ritzman Alaska Program Director Sierra Club Dan.ritzman@sierraclub.org David C. Raskin Board of Directors Friends of Alaska National Wildlife Refuges davidraskin@yahoo.com Julie Kates Refuge Associate, Federal Lands Program Defenders of Wildlife JKates@defenders.org Lois Epstein Arctic Program Director The Wilderness Society lois_epstein@tws.org Charles M. Clusen Director, Alaska Project Natural Resources Defense Council cclusen@nrdc.org Faith Gemmill Executive Director Resisting Environmental Destruction on Indigenous Lands (REDOIL) Redoil1@alaska.net	

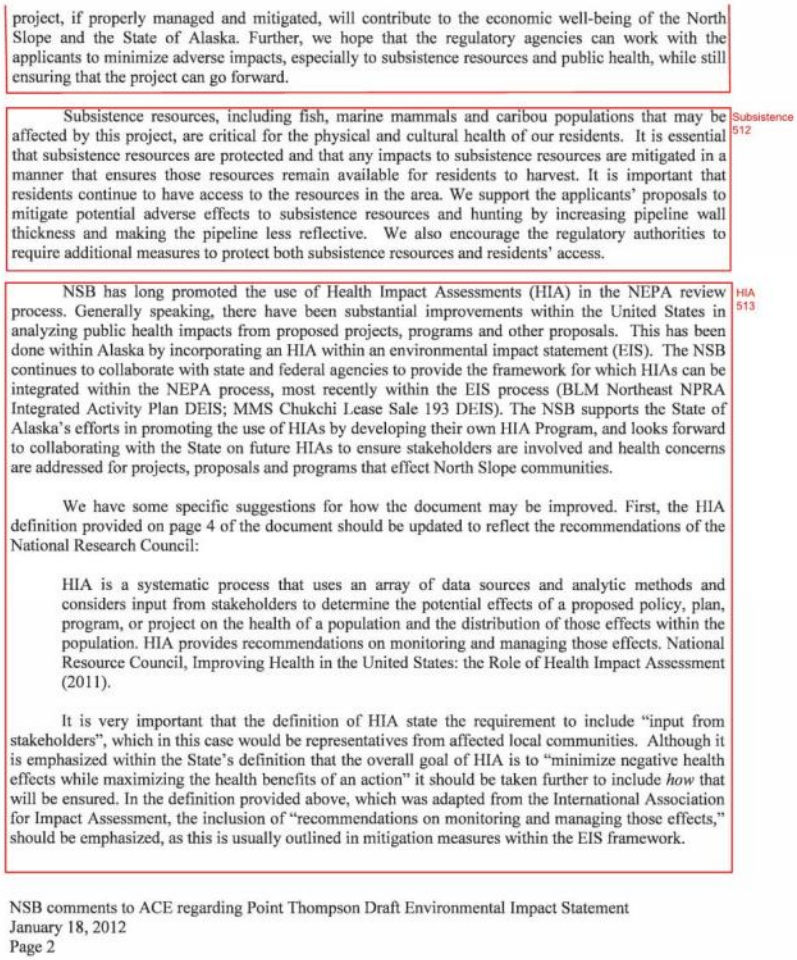
Comment	Response
Davis, Cecile 0232_Bob.Barndt_IND **Sent:** Wednesday, January 18, 2012 10:03 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Bob Barndt Email: bbarndt@mtaonline.net Address: 18006 Teklanika Dr City: Eagle River State: AK Zip: 99577 Contact Phone: 907-684-4887 Statement of Support for Alternative B 508 Comments: I support the Alternative B to further encourage the development of Pt. Thompson and do it in a safe, economic and environmentally friendly manner. 1	508 Comment noted; no action required.

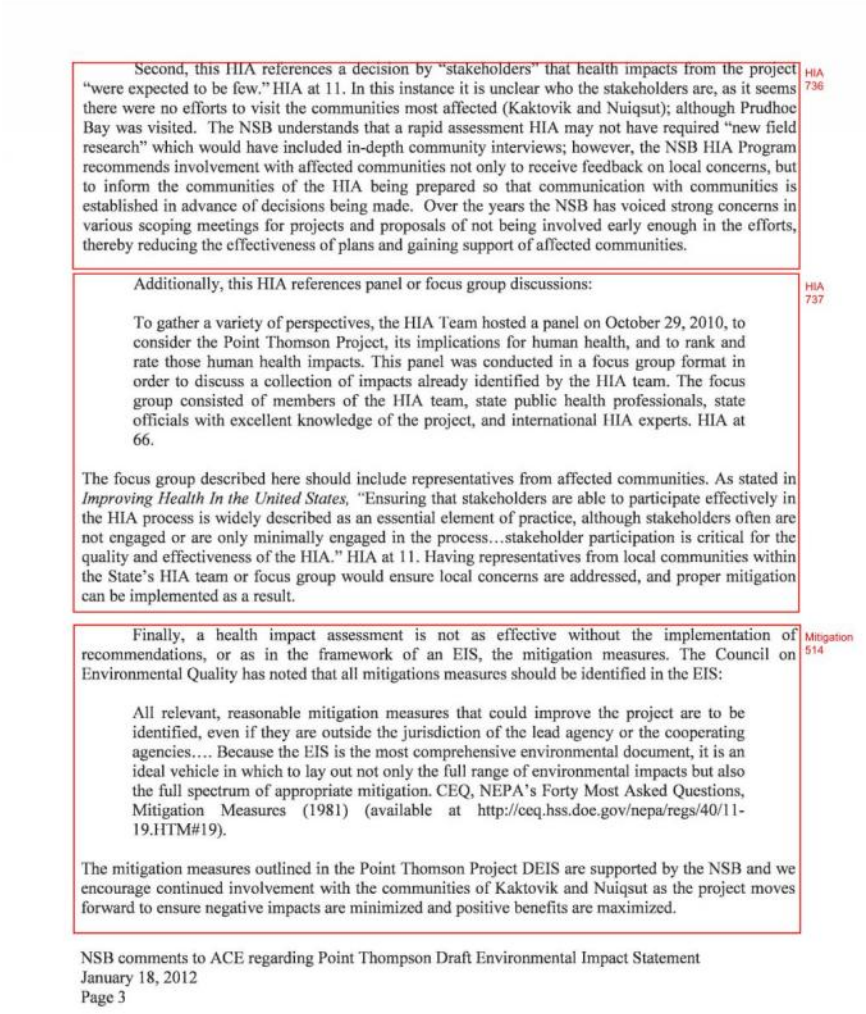
Comment	Response
Davis, Cecile 0233_Matthew.Cronin_IND **Sent:** Wednesday, January 18, 2012 12:38 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Matthew A. Cronin Email: croninm@aol.com Contact me through email: Yes Address: 8415 Jupiter Drive City: Anchorage State: AK Zip: 99507 Contact Phone: Add me to mailing list: Yes Comments: Dear Army Corps of Engineers, Statement of Support for Alternative B 509 I support approval for ExxonMobil's Point Thomson Development Project. I think Alternative B is the best alternative. Please consider the points below in support of the project. Sincerely, Matthew A. Cronin, Ph.D. •The proposed project is important to the state of Alaska and to Alaskans. •Of the design alternatives considered, Alternative B provides the safest, most environmentally-responsible solution for developing Point Thomson's resources. •Alternative B ensures a minimal environmental footprint by incorporating a combination of summer coastal barging, winter ice roads, aviation, and in-field roads. These features are essential to the project's safe and efficient operations. •Through Alternative B, ExxonMobil will implement comprehensive mitigation measures to minimize impact on tundra, wildlife, aquatic resources, and subsistence activities. •ExxonMobil works closely with the U.S. Fish and Wildlife Service and state agencies to ensure polar bears and other wildlife are fully protected. Coastal barge route is outside the main fall migration corridor of bowhead whales. •The Point Thomson project will provide wide-ranging benefits to Alaska in the form of new business opportunities, jobs, and revenues. •Approval of the Point Thomson project, as proposed in Alternative B, is vital to the development of this world-class resource and North Slope gas commercialization. •Direct benefits to the State of Alaska from Point Thomson include training and jobs for Alaskans, new revenues to the state and local governments, increased throughput for the Trans-Alaska oil pipeline, and increased business activity and revenue for the private sector. 1	509 Comment noted; no action required.

Comment	Response
•Point Thomson is a highly-technical project with high costs. Unnecessary requirements that provide very little, if any, incremental environmental benefits, should be avoided as to not compromise the economic viability of the project. •The in-field roads included in Alternative B have been carefully routed to minimize the gravel footprint and for the efficient pass through of water. •Moving roads inland as proposed in Alternative C and D would increase the gravel footprint and be less effective in maintaining natural drainage patterns of the project area. •Alternatives C and D would move project components inland and eliminate barging, which is an established and safe means of supply for North Slope communities, including Prudhoe Bay. ExxonMobil has conducted safe barging operations in accordance with the Alaska Eskimo Whaling Commission Conflict Avoidance Agreement and in direct consultation with local whaling communities. 188 barging trips in support of Point Thomson have occurred with no impacts to marine mammals or subsistence. •Alternatives C and D both result in inefficient logistical support and adds unnecessary challenges. Eliminating summer barging would result in increased costs, schedule delays, and increased tundra traffic. •The 44-mile gravel road from Endicott to Point Thomson as proposed under Alternative C would create a much larger tundra footprint. Current North Slope experience at Alpine and Badami demonstrates that a gravel road is not necessary to support Point Thomson. However, not having a road connecting to Prudhoe Bay does make the combination of barging, ice roads, air access and in-field gravel roads essential. •Alternative E would eliminate in-field gravel roads and shorten the airstrip. This alternative relies solely on helicopters and seasonally limited off-road vehicles for transportation to East and West pads for nine months of the year. There is no North Slope precedent for a production facility with such limitations. Moreover, inability to fly in poor weather introduces unnecessary safety risks for personnel, as well as emergency response limitations and operational inefficiencies. •The longer runway in Alternative B provides better access in bad weather, reduces the number of flights by allowing larger aircraft for routine cargo shipments and allows for aircraft to transport larger equipment capabilities in the event of an emergency. 2	Comment Document 233 continued.

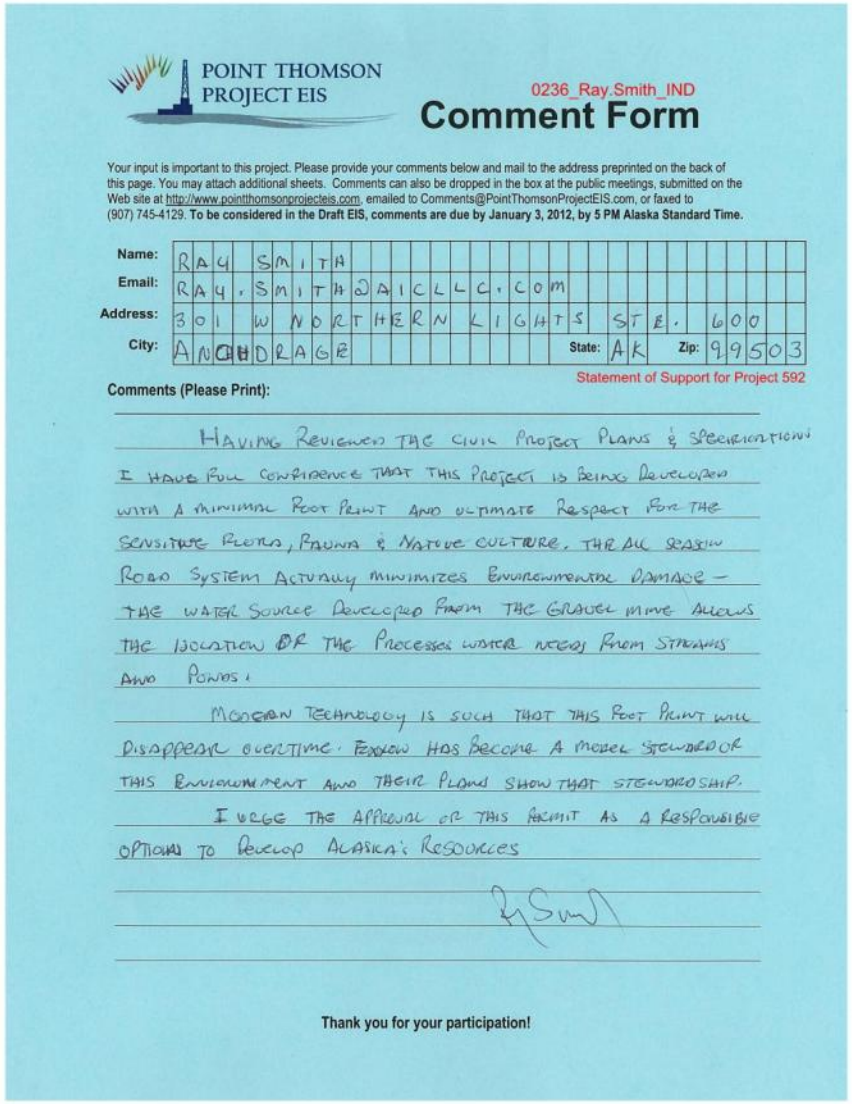
Comment	Response
Davis, Cecile 0234_Ron.Kahlenbeck_IND **Sent:** Wednesday, January 18, 2012 2:46 PM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Ron Kahlenbeck Email: orka@gci.net Address: 4371 Rendezvous Circle City: Anchorage State: AK Zip: 99504 Contact Phone: Comments: I support alternative B. Statement of Support for Alternative B 510 1	510 Comment noted; no action required.

Comment	Response
0235_Charlotte.Brower_LGOV **North Slope Borough** OFFICE OF THE MAYOR P.O. Box 69 Barrow, Alaska 99723 Phone: 907 852-2611 or 0200 Fax: 907 852-0337 *Charlotte E. Brower, Mayor* January 18, 2012 Harry A. Baij, Jr. Project Manager Department of the Army U.S. Army Engineer District, Alaska Regulatory Division P.O. Box 6898 Elmendorf AFB, Alaska 99506-0898 harry.a.baij@usace.army.mil Submitted by Email Re: Point Thompson Project Draft Environmental Impact Statement Dear Mr. Baij: Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the proposed Point Thompson Project. This proposed project will be a substantial new development of hydrocarbon resources, gas condensate and possibly oil, on the North Slope of Alaska. The project seeks to access the Thomson Sand Reservoir, which extends offshore under state coastal waters. The project is located 60 miles east of Deadhorse and Prudhoe Bay and 60 miles west of Kaktovik. The various alternatives would place pads various distances from the coast, but as close as 500 feet. The footprint of this project is relatively substantial, with the central processing pad alone being over 50 acres. The DEIS acknowledges that there may be future development in the area as well. The North Slope Borough (NSB) is the regional municipal government for Northern Alaska and encompasses the area within which the proposed project will take place. Generally, NSB supports on land development provided such development occurs in a responsible and environmentally sound manner. There are a number of positive aspects to this project. First, we believe that onshore development is safer and preferable to offshore; therefore we see this project, an onshore facility designed to access offshore oil and gas resources, as a sensible and responsible approach. Second, this EIS General 511	511 Comment noted; no action required.

Comment	Response
	512 Mitigation measures in addition to the Applicant's Design Measures noted in Table 4.4-1 of the Draft EIS are identified in the Final EIS. 513 The Health Impact Assessment for the Point Thomson project was prepared by the Alaska Department of Health and Social Services and not by the Corps. The Corps reviewed the HIA and included it as supplemental information in Appendix R of the EIS. The HIA's findings were summarized and included in Section 5.23, Human Health. The comment has been forwarded to the State for its consideration; however, updating that document is outside the purview of the Corps and this EIS.

Comment	Response
	736 See the response to Comment 513 above. 737 See the response to Comment 513 above. 514 During the 404(b)(1) Guidelines analysis, the Corps will consider mitigation options along with impacts to the environment identified during the NEPA process before making its final permit decision.

Comment	Response
Physical Oceanography and Coastal Processes 515 Beyond just addressing subsistence and health concerns during the life of facility operations, the project ought to be designed and mitigated in a manner that reflects the longevity of the facility and the need for long term maintenance of the site. As the DEIS points out, the area where the applicant proposes to build, while protected to some extent by barrier islands, is subject to coastal erosion. With climate change bringing more intense fall storms and greater fetch, it is possible that the erosion rates will increase. The anticipated environmental conditions, such as the rate of coastal erosion, should play a role in the project design. Whichever Alternative is selected, long-term coastal erosion forecasts must to be addressed. The North Slope Borough will also work with the applicants as the re-zone application is processed and spill plan is reviewed to ensure that the project is well-designed. Thank you for considering our comments and concerns. Sincerely, Charlotte E. Brower Mayor Cc: Jacob Adams, Sr., NSB Chief Administrative Officer Richard Camilleri, Advisor to NSB Mayor Andy Mack, Advisor to NSB Mayor Ian Young, Advisor to NSB Mayor Ethel Patkotak, North Slope Borough Attorney Taqulik Hepa, Director, NSB Wildlife Management Rhoda Ahmaogak, Director, NSB Planning & Community Services Doreen Leavitt, Director, NSB Health & Social Services NSB comments to ACE regarding Point Thompson Draft Environmental Impact Statement January 18, 2012 Page 4	515 The Applicant conducted a coastal engineering assessment (Draft Metocean Design Criteria Study; PND 2009a), which addresses long-term coastal erosion forecasts relative to the project design. Additional information from this report has been added to Section 5.5.3.1, Alternative B: Construction and Operation, under a new subsection titled "Pads," and information has also been added regarding the plug and abandonment process for hydrocarbon wells under a new subsection titled "Wells" to address longer-term coastal erosion concerns. Coastal erosion rates are also discussed in Section 3.5.5, Coastal Processes.

Comment	Response
	592 Comment noted; no action required.

POINT THOMSON PROJECT EIS

0236_Ray.Smith_IND

Comment Form

Your input is important to this project. Please provide your comments below and mail to the address preprinted on the back of this page. You may attach additional sheets. Comments can also be dropped in the box at the public meetings, submitted on the Web site at http://www.pointthomsonprojecteis.com, emailed to Comments@PointThomsonProjectEIS.com, or faxed to (907) 745-4129. **To be considered in the Draft EIS, comments are due by January 3, 2012, by 5 PM Alaska Standard Time.**

Name: RAY SMITH
Email: RAY.SMITH@AICLLC.COM
Address: 301 W NORTHERN LIGHTS STE. 600
City: ANCHORAGE State: AK Zip: 99503

Statement of Support for Project 592

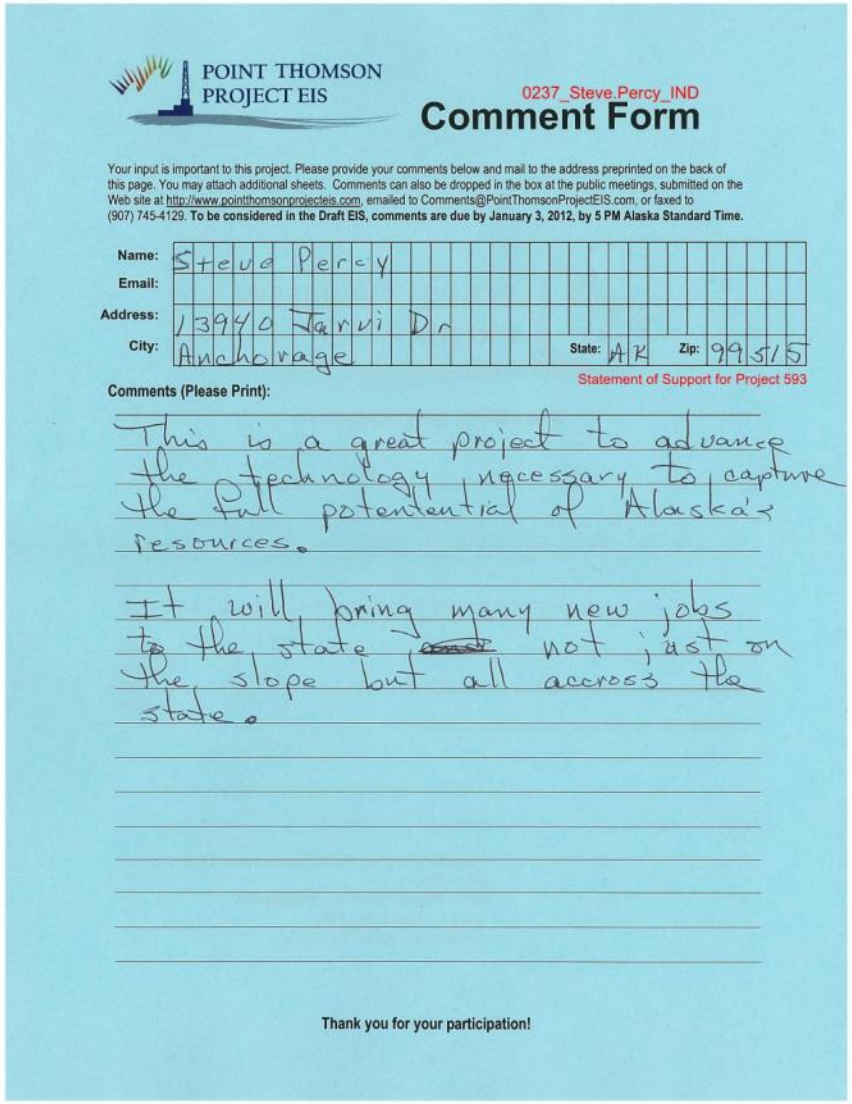
Comments (Please Print):

HAVING REVIEWED THE CIVIL PROJECT PLANS & SPECIFICATIONS I HAVE FULL CONFIDENCE THAT THIS PROJECT IS BEING DEVELOPED WITH A MINIMAL FOOT PRINT AND ULTIMATE RESPECT FOR THE SENSITIVE FLORA, FAUNA & NATIVE CULTURE. THE ALL SEASON ROAD SYSTEM ACTUALLY MINIMIZES ENVIRONMENTAL DAMAGE – THE WATER SOURCE DEVELOPED FROM THE GRAVEL MINE ALLOWS THE ISOLATION OF THE PROCESSES WATER NEED FROM STREAMS AND PONDS.

MODERN TECHNOLOGY IS SUCH THAT THIS FOOT PRINT WILL DISAPPEAR OVERTIME. EXXON HAS BECOME A MODEL STEWARD OF THIS ENVIRONMENT AND THEIR PLANS SHOW THAT STEWARDSHIP.

I URGE THE APPROVAL OF THIS PERMIT AS A RESPONSIBLE OPTION TO DEVELOP ALASKA'S RESOURCES

Thank you for your participation!

Comment	Response
	593 Comment noted; no action required.

POINT THOMSON PROJECT EIS

0237_Steve.Percy_IND

Comment Form

Your input is important to this project. Please provide your comments below and mail to the address preprinted on the back of this page. You may attach additional sheets. Comments can also be dropped in the box at the public meetings, submitted on the Web site at http://www.pointthomsonprojecteis.com, emailed to Comments@PointThomsonProjectEIS.com, or faxed to (907) 745-4129. **To be considered in the Draft EIS, comments are due by January 3, 2012, by 5 PM Alaska Standard Time.**

Name: Steve Percy

Email:

Address: 13940 Tarvi Dr

City: Anchorage State: AK Zip: 99515

Statement of Support for Project 593

Comments (Please Print):

This is a great project to advance the technology necessary to capture the full potential of Alaska's resources.

It will bring many new jobs to the state, not just on the slope but all across the state.

Thank you for your participation!

Comment	Response

0238_Robert.Mecum_FGOV

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668

January 18, 2012

Colonel Reinhard W. Koenig
U.S. Army Corps of Engineers, Alaska District
P.O. Box 6898
Elmendorf AFB, Alaska 99506-0898

Re: POA-2001-1082-M1, Beaufort Sea and Point Thomson Project Draft Environmental Impact Statement

Attn: Harry A. Baij Jr.

Dear Colonel Koenig:

The National Marine Fisheries Service (NMFS) has reviewed the US Army Corps of Engineers' (Corps) Public Notice of Application for Permit, POA-2001-1082-MI, Beaufort Sea, and the Point Thomson Project Draft Environmental Impact Statement (Draft EIS) dated November 2011. NMFS has also reviewed several prior documents regarding the proposed project, and provided scoping comments to the Corps on February 25, 2010. NMFS offers the following comments under the Fish and Wildlife Coordination Act, Endangered Species Act (ESA), Marine Mammal Protection Act (MMPA), and the Essential Fish Habitat (EFH) provisions of the Magnuson-Stevens Fishery Conservation and Management Act (MSA).

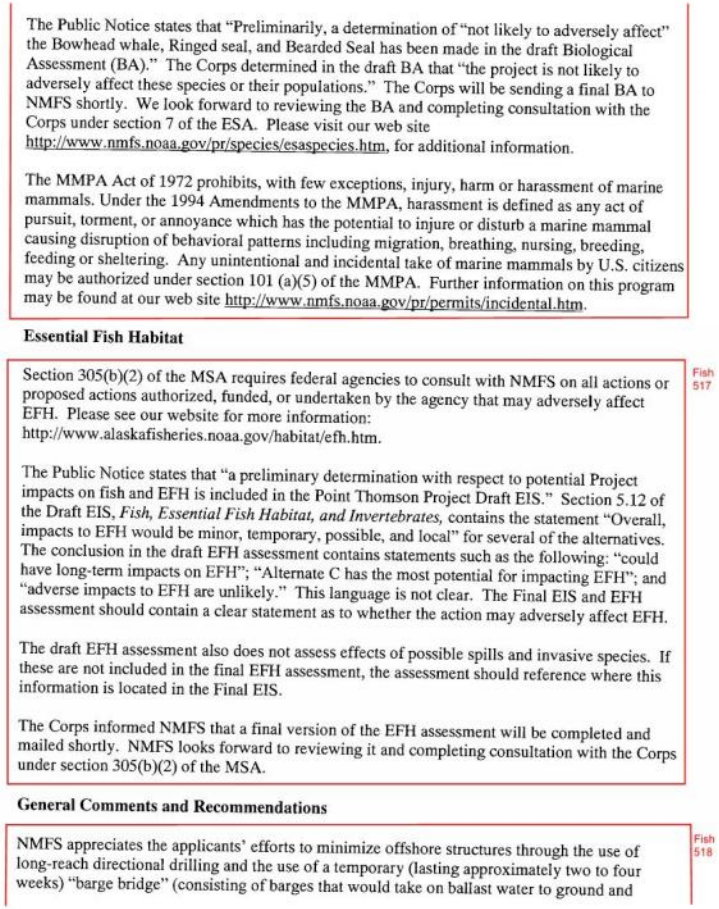
Project and Alternative Descriptions

Exxon Mobil Corporation and PTE Pipeline LLC (the applicants) are proposing to initiate commercial hydrocarbon production of the Thomson Sand Reservoir on the North Slope of Alaska by the winter season of 2015-16, and to delineate and evaluate hydrocarbon resources in the Point Thomson area. Proposed work includes the construction and operation of a minimum of five wells, to be drilled utilizing long-reach directional drilling from three onshore pads (Central Pad, East Pad and West Pad) to offshore portions of the reservoir. Point Thomson is the largest discovered undeveloped natural gas field in Alaska. The Executive Summary of the Draft EIS notes that the requirements for full field development cannot be accurately defined until further evaluation of the resources within the reservoir. Future development could include greater volumes of gas condensate and crude oil production from the reservoir's oil rim and adjacent reservoirs in the Brookian Group Sandstones.

A Central Processing Facility (CPF) at the Central Pad would separate hydrocarbon liquids from the natural gas, and the residual gas would be re-injected into the reservoir. A new twenty- two mile elevated pipeline would be constructed for transporting hydrocarbon liquids (condensate and possibly oil) west to connect with the Trans Alaska Pipeline System (TAPS). The proposed project would also include the following: a disposal well at the CPF; support facilities; infield gravel roads; pipelines; an airstrip; a gravel mine site; ice roads; a temporary "barge bridge" for offloading large gas field modules; and minor dredging of the sea floor at the barge bridge site to accommodate the barges.

ALASKA REGION - www.fakr.noaa.gov

Comment	Response
As defined in the Draft EIS the project area extends eastward from Deadhorse to the Canning/ Staines River, and from the lagoon side of Flaxman Island and the Maguire Islands along the Beaufort Sea coast to approximately eight miles south of the coastline. Most of the Thomson Sand Reservoir is offshore, under state coastal waters; however, most of the proposed facilities would be located on land. There are five possible alternatives for the project. Under Alternative A (No Action), the Corps would not issue a permit, and the applicants would suspend all project planning and engineering. Only monitoring of the two existing (capped) wells would occur. Under Alternative B (Applicants Proposed Action), the applicants would utilize seasonal and infield ice roads, marine transport by coastal and oceangoing (sealift) barges, air transport by helicopters and fixed-wing aircraft, and gravel roads. Alternative B would also include construction of a sealift facility and a service pier on the coast at the Central Pad to facilitate docking of sealift and coastal barges. Minor dredging and screeding would occur to allow barge landings. Under Alternative C (Inland Pads with Gravel Access Road), some project components would be located inland and there would be four gravel pads, along with a gravel access road for year round access between Point Thomson and the Endicott Spur Road. This road would eliminate the need to construct a coastal barge facility at Point Thomson. This alternative is intended to minimize impacts to coastal resources. However a fifty-one mile export pipeline would be constructed from the Central Pad to connect to the existing Endicott common carrier pipeline. This pipeline would cross larger, braided rivers that provide EFH for salmon. Additionally, the Draft EIS notes that it may be necessary to utilize more coastal facilities in the future as the resources are further identified and if needed for the long-range directional drilling. Alternative D (Inland Pads with Seasonal Ice Access Road) is also intended to minimize impacts to coastal resources by locating project components inland from the coastline. As in Alternative C, no barging facilities would be built and the same four gravel pads would be used. Under Alternative D, there would be construction of a sea or tundra ice road between the Endicott Spur Road and the Point Thomson site annually for the life of the project. Alternative E (Coastal Pads with Seasonal Ice Roads) is intended to reduce impacts to wetlands and surrounding water resources by minimizing the development footprint through the use of less gravel fill. Multiyear ice pads would be used to expand the gravel well pad footprints during drilling. Also, seasonal ice roads would be used for much of the infield road system. Alternative E would include the same barging facilities as in Alternative B. **Threatened and Endangered Species / Marine Mammals** NMFS has management responsibility for all marine mammals in Alaska except sea otter, walrus, and polar bear, and for several species listed as threatened or endangered under the ESA. Section 7(a)(2) of the ESA directs federal interagency cooperation "to insure that any action authorized, funded, or carried out by such agency is not likely to jeopardize the continued existence of any endangered species or threatened species" or result in the destruction or adverse modification of critical habitat. T&E Species 516 2	516 Marine mammals protected under MMPA and ESA are discussed in the EIS and impacts to these species are evaluated. The final Biological Assessment for bowhead whales and ringed and bearded seals was submitted to the NMFS in January 2012 as part of the ESA consultation process. Regulatory consultation required by the Applicant under MMPA is presented in Chapter 1 and discussed in Appendix F, Compliance with Related Law.

Comment	Response
	517 The Corps initiated EFH consultation with NMFS in January 2012 with submittal of the EFH Assessment. Section 5.12 of the Final EIS and EFH Assessment have been revised to clarify that adverse impacts to EFH are unlikely from the Point Thomson Project, except possibly under Alternative C. 518 Comment noted; no action required.

The Public Notice states that "Preliminarily, a determination of "not likely to adversely affect" the Bowhead whale, Ringed seal, and Bearded Seal has been made in the draft Biological Assessment (BA)." The Corps determined in the draft BA that "the project is not likely to adversely affect these species or their populations." The Corps will be sending a final BA to NMFS shortly. We look forward to reviewing the BA and completing consultation with the Corps under section 7 of the ESA. Please visit our web site http://www.nmfs.noaa.gov/pr/species/esaspecies.htm, for additional information.

The MMPA Act of 1972 prohibits, with few exceptions, injury, harm or harassment of marine mammals. Under the 1994 Amendments to the MMPA, harassment is defined as any act of pursuit, torment, or annoyance which has the potential to injure or disturb a marine mammal causing disruption of behavioral patterns including migration, breathing, nursing, breeding, feeding or sheltering. Any unintentional and incidental take of marine mammals by U.S. citizens may be authorized under section 101 (a)(5) of the MMPA. Further information on this program may be found at our web site http://www.nmfs.noaa.gov/pr/permits/incidental.htm.

Essential Fish Habitat

Section 305(b)(2) of the MSA requires federal agencies to consult with NMFS on all actions or proposed actions authorized, funded, or undertaken by the agency that may adversely affect EFH. Please see our website for more information: http://www.alaskafisheries.noaa.gov/habitat/efh.htm. Fish 517

The Public Notice states that "a preliminary determination with respect to potential Project impacts on fish and EFH is included in the Point Thomson Project Draft EIS." Section 5.12 of the Draft EIS, *Fish, Essential Fish Habitat, and Invertebrates,* contains the statement "Overall, impacts to EFH would be minor, temporary, possible, and local" for several of the alternatives. The conclusion in the draft EFH assessment contains statements such as the following: "could have long-term impacts on EFH"; "Alternate C has the most potential for impacting EFH"; and "adverse impacts to EFH are unlikely." This language is not clear. The Final EIS and EFH assessment should contain a clear statement as to whether the action may adversely affect EFH.

The draft EFH assessment also does not assess effects of possible spills and invasive species. If these are not included in the final EFH assessment, the assessment should reference where this information is located in the Final EIS.

The Corps informed NMFS that a final version of the EFH assessment will be completed and mailed shortly. NMFS looks forward to reviewing it and completing consultation with the Corps under section 305(b)(2) of the MSA.

General Comments and Recommendations

NMFS appreciates the applicants' efforts to minimize offshore structures through the use of long-reach directional drilling and the use of a temporary (lasting approximately two to four weeks) "barge bridge" (consisting of barges that would take on ballast water to ground and Fish 518

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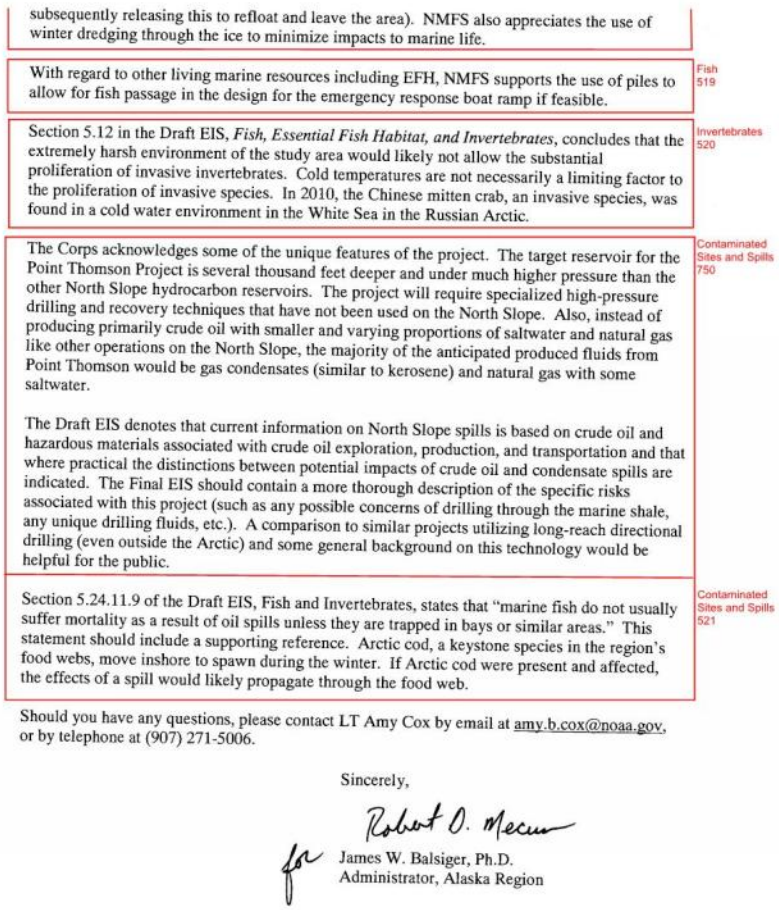
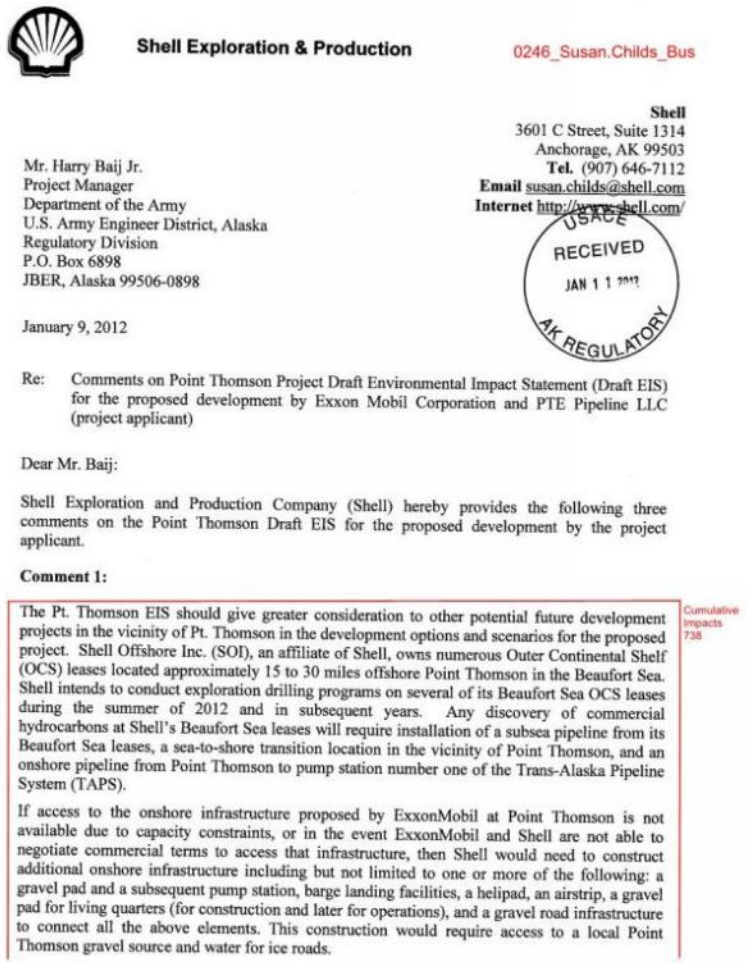
Comment	Response
	519 The Corps will evaluate the feasibility of a pile-supported boat ramp with the Applicant during the permitting process. 520 Section 5.12.3.1, Alternative B: Construction, has been revised to clarify that although the harsh marine environment of the arctic is generally inhospitable to invasive species, some species, such as the Chinese mitten crab, could persist if introduced. 750 Marine shale would be drilled through in order to reach the sandstone reservoir. The Corps is not aware of special spill concerns associated with drilling through marine shale. Additional discussion of the drilling muds to be used for the Point Thomson Project has been added to Section 5.24.2.2, Types of Material Spilled: "Two different types of drilling mud would be used for the Point Thomson wells. The surface interval would be drilled with a high viscosity, water-based mud consisting of a freshwater, bentonite, and polymer mixture. Nonaqueous fluid (NAF) drilling muds would be used for drilling below the surface casing (Appendix D, RFI 112)." Text regarding long-reach directional drilling relative to spills has been added to the introductory text for Section 5.24: "Long-reach directional drilling would be used for the Point Thomson Project to access the offshore reservoir without the impacts to offshore and coastal environments that would be posed by using offshore well pads. Long-reach directional drilling requires specialized drilling rigs and computer technology to steer the borehole to the desired location in the hydrocarbon reservoir. Directional drilling, while a safe and proven technology, introduces the risk of friction and increases the complexity of drilling in terms of controlling the pressure of the well. Increases in the horizontal drilling distance increase the complexity of well development and the level of concern about safety. Consequently, even in a directional drilling scenario the technically preferable approach is to be as close to the resource as possible to pursue the safest and most efficient drilling program possible." We are not aware of specific differences in this technology compared to standard wells relative to spills. Finally, we have added further discussion of blowout prevention technology to Section 3.24.5.4,Blowouts and Uncontrolled Releases prior to the last paragraph: "Three types of protection are used to address blowouts—drilling mud, blowout preventers, and diverters. Drilling mud exerts downward pressure to control the formation pressure. If the formation pressure exceeds the drilling mud pressure, a blowout preventer shuts off the well hole and prevents the escape of underground fluids. A blowout preventer consists of high-pressure safety valves and associated equipment installed on top of the casing

Comment	Response
	head. Blowout preventers cannot be installed until the well is cased. Therefore, in the early stages of drilling a well, a pipe system called a diverter is used to route gas from a blowout away from the rig to reduce the risk of explosion." 521 The quoted statement from the Draft EIS Section 5.24.11.9, Fish and Invertebrates, does not have a specific reference but is supported by the discussion that follows. To that end, the following text has been inserted after, "Also, marine fish do not usually suffer mortality as a result of oil spills unless they are trapped in bays or similar areas": "Arctic cod, a keystone species in the region's food webs, move inshore to spawn during the winter (Morrow 1980). However, spills would be unlikely to reach marine waters during the winter due to the presence of sea ice. Further, due to the presence of bottom-fast ice to a depth of about 7 feet, the fish would not be able to access the nearshore areas in the vicinity of the pads."

Comment	Response
cc: brad.smith@noaa.gov jeanne.hanson@noaa.gov steven.k.davis@noaa.gov timothy.mccune@noaa.gov steve.kokkinakis@noaa.gov louise_smith@fws.gov rockwell.theodore@epa.gov harry.a.baij@usace.army.mil **References** BarrentsObserver.Com Cross Boarder News. (2010, July 21). "New Invasive Crab Found in Russian Arctic." http://www.barentsobserver.com/new-invasive-crab-found-in-russian-arctic.4801732-16176.html (include with Invertebrates comment on page 4) G:COE Point Thomson POA 2001-1082-M1 draft EIS ac 1-18-12 5	Comment Document 238 continued.

Comment	Response
Davis, Cecile 0239_Chris.Storhok_LGOV **Sent:** Thursday, January 19, 2012 11:40 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Chris Storhok Email: cstorhok@fnsb.us Contact me through email: Yes Address: 809 Pioneer Rd City: Fairbanks State: AK Zip: 99707 Contact Phone: 907-459-1351 Add me to mailing list: Yes Statement of Support for Alternative B 522 Comments: The FNSB Economic Development Specialist strongly supports Alternative B.	522 Comment noted; no action required.
Davis, Cecile 0240_Luke.Hopkins_LGOV **Sent:** Thursday, January 19, 2012 11:43 AM **To:** comments@pointthomsonprojecteis.com **Cc:** extraski@gmail.com **Subject:** Online form submission Name: Luke Hopkins Email: mayor@fnsb.us Contact me through email: Yes Address: P. O. Box 71267 City: Fairbanks State: AK Zip: 99707 Contact Phone: 907-459-1304 Add me to mailing list: Yes Statement of Support for Alternative B 523 Comments: As Mayor of the Fairbanks North Star Borough, I support Alternative B and I look forward to the project moving forward.	523 Comment noted; no action required.

Coded Comment	Response
	738 The Point Thomson EIS identifies Shell's offshore activities within the reasonably foreseeable future actions and cumulative impacts discussion. The Shell activities have not reached a sufficient level of development certainty to elevate them out of the reasonably foreseeable future actions discussion. As identified in the comment, there are a number of business agreements as well as the discovery of commercial hydrocarbons offshore that would need to come to fruition before any interrelation between Shell activities and the Applicant's activities would affect the Point Thomson Project design and/or environmental impacts in the vicinity of Point Thomson.

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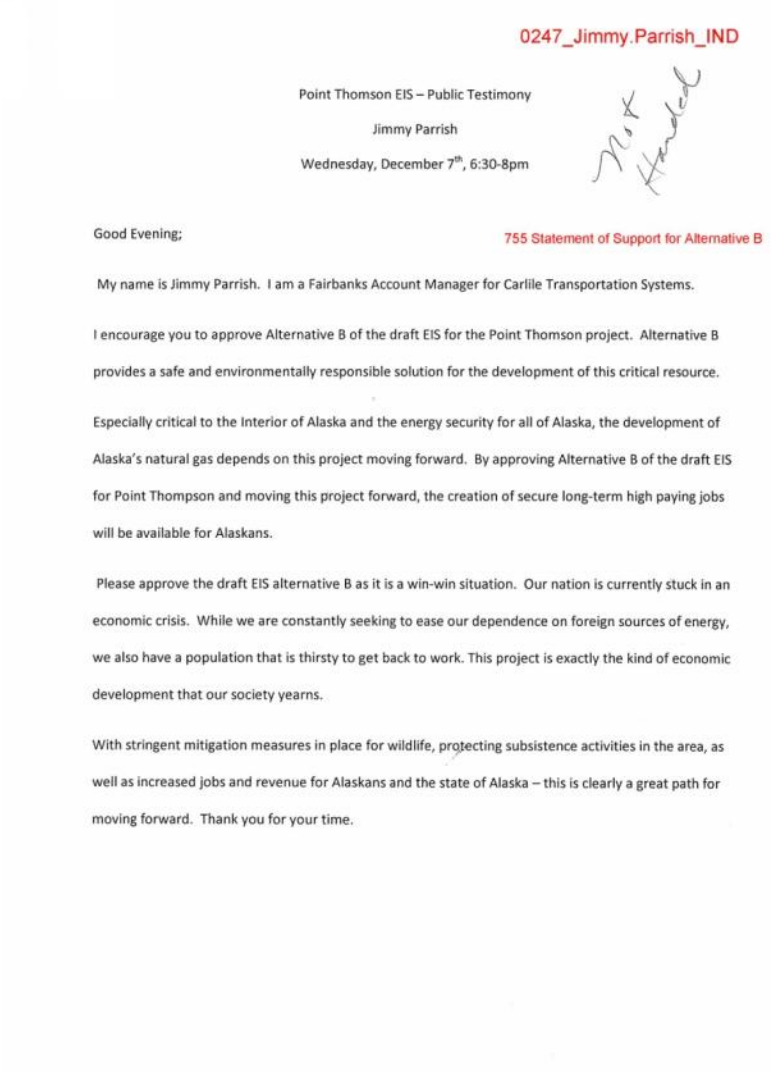
If access to the onshore pipeline from Point Thomson to Badami proposed by ExxonMobil is not available due to capacity constraints, or in the event ExxonMobil and Shell are not able to negotiate commercial terms, then Shell would also need to build a separate pipeline, including vertical support members (VSMs) and river crossings from Pt. Thomson to Badami or all the way to pump station number one of the Trans-Alaska Pipeline System (TAPS). **Comment 2:** The Draft EIS notes that mitigation measures in addition to and/or different than those contained in the current project description/evaluation may be imposed during the agency's development of the final EIS. In the event the agency develops additional and/or different mitigation measures following the initial public comment period and in the course of developing its final EIS, the agency should provide an additional period for public comment on those new and/or revised mitigation measures, given the potential impact of those mitigation measures on future development projects in the vicinity of Pt. Thomson. Mitigation 739 **Comment 3:** The Draft EIS states that the U.S. Army Corps of Engineers will avoid making a decision on the agency preferred alternative until issuance of the Record of Decision. Given the likelihood of additional development projects in the vicinity of Pt. Thomson, the agency should identify its preferred alternative early in the review process, and allow for public comment on that preferred alternative, so that other interested parties might better understand the agency's rationale for its proposed decision and provide comments specific to that preferred alternative and the possible impacts to other future development activities in the vicinity of Pt. Thomson. EIS General 740 If you have any questions regarding this submission, please contact me at (907) 646-7112 or at Susan.Childs@Shell.com, or Mark Newell at (832) 337-1898 or at Mark.Newell@Shell.com. Thank you, Susan Childs AK Venture Support Integrator, Manager	739 The Final EIS contains mitigation under consideration by the Corps. The Corps will further consider mitigation options before making its final permit decision. The Record of Decision (ROD) and accompanying documentation will identify adopted mitigation measures. The ROD is followed by a 30-day no action period. The Corps does not normally accept comments during that time. 740 The Corps is neither a proponent or opponent of proposed project, and therefore cannot identify an agency-preferred alternative. The Corps considers identifying a preferred alternative in a NEPA document predecisional and therefore does not identify the Least Environmentally Damaging Practicable Alternative, the only alternative that the Corps is able to permit, until the Record of Decision.

Coded Comment	Response
 0247_Jimmy.Parrish_IND Point Thomson EIS – Public Testimony Jimmy Parrish Wednesday, December 7th, 6:30-8pm Good Evening; 755 Statement of Support for Alternative B My name is Jimmy Parrish. I am a Fairbanks Account Manager for Carlile Transportation Systems. I encourage you to approve Alternative B of the draft EIS for the Point Thomson project. Alternative B provides a safe and environmentally responsible solution for the development of this critical resource. Especially critical to the Interior of Alaska and the energy security for all of Alaska, the development of Alaska's natural gas depends on this project moving forward. By approving Alternative B of the draft EIS for Point Thompson and moving this project forward, the creation of secure long-term high paying jobs will be available for Alaskans. Please approve the draft EIS alternative B as it is a win-win situation. Our nation is currently stuck in an economic crisis. While we are constantly seeking to ease our dependence on foreign sources of energy, we also have a population that is thirsty to get back to work. This project is exactly the kind of economic development that our society yearns. With stringent mitigation measures in place for wildlife, protecting subsistence activities in the area, as well as increased jobs and revenue for Alaskans and the state of Alaska – this is clearly a great path for moving forward. Thank you for your time.	755 Comment noted; no action required.