

Congress of the United States
Washington, DC 20510

July 14, 2016

The Honorable Sally Jewell
Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Jewell:

We write to express our concerns about the timeliness of the processing of an Application for Permit to Drill (APD) for Greater Mooses Tooth (GMT2), and the new non-National Environmental Policy Act (NEPA) mitigation regime proposed for the National Petroleum Reserve – Alaska (NPR-A) by the Bureau of Land Management (BLM).

To prepare for development in the NPR-A, we understand the BLM Alaska has done the following, among other things:

- Conducted analyses for, and assigned mitigation value to, the development of Greater Mooses Tooth 1 (GMT1);
- Approved GMT2 in the 2004 Record of Decision for the Alpine Satellite Development Plan;
- Included GMT2 in the 2013 NPR-A Integrated Activity Plan (IAP); and
- Met with the project proponent and determined that for streamlined permitting, it would be better to relocate the GMT2 drill site, which the APD reflects.

Following the lengthy process required to bring the Colville Delta 5 (CD5) field and ultimately GMT1 into production, and given the announcement of a new IAP/Environmental Impact Statement for the entire NPR-A in February 2013, Alaskans had great hope that the model had been established for future development in the NPR-A.

We understand that in August 2015, the project proponent submitted the APD for GMT2. BLM Alaska received a completed package in September 2015, which was forwarded to the BLM Headquarters in January 2016. On average over the last ten years, it has taken BLM Alaska approximately three months to process an APD. In the instance of the GMT2 APD, it is our understanding that after seven months, the package remains under Deputy Director Linda Lance's review.

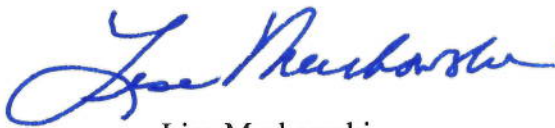
As you are aware, due to the very short construction season, permitting delays seriously threaten economic activity in Alaska. In this particular case, the project proponent risks the loss of an entire year of development if a Notice of Intent is not issued within the next two weeks.

Additionally, while the approval timelines seem to be a moving target, so too is the mitigation calculus itself. We are increasingly concerned about the potential for duplicative mitigation, and specifically the non-NEPA mitigation regime that is being proposed above and beyond the more than 250 mitigation measures that the project proponent has previously performed voluntarily or has been required to perform by local, State and Federal governments. BLM continues to lack a transparent calculus for non-NEPA mitigation requirements. We would appreciate a specific explanation of the legal authority for the BLM to require non-NEPA mitigation measures or fees. We are also particularly concerned with the lack of “credit” for proposed plans that reflect project modifications made at the suggestion of the BLM to proactively mitigate agency concerns.

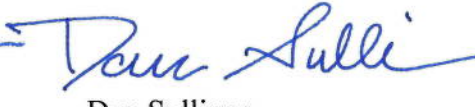
Moreover, the proposed Regional Mitigation Strategy (RMS) places emphasis on environmental justice and socio-economic issues, but it conspicuously fails to consider positive impacts of projects. Further, the RMS does not contain any analytic basis for how the various proposed fees are calculated. We believe a transparent calculus is critical for any mitigation requirements beyond the statutory requirements outlined in the NEPA and Clean Water Act.

The NPR-A is touted as the Administration’s model for mitigation. Let it be the model by supporting the Administration’s assertion that its mitigation policy creates predictability, and spurring sorely needed -- yet responsible – development for the people of Alaska.

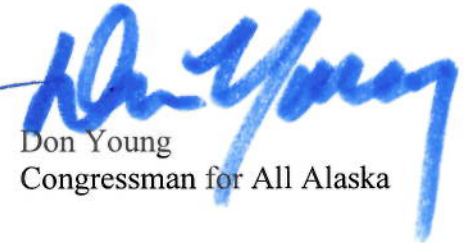
Sincerely,



Lisa Murkowski
United States Senator



Dan Sullivan
United States Senator



Don Young
Congressman for All Alaska