

## Alaska Oil and Gas Association

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### TESTIMONY OF THE ALASKA OIL & GAS ASSOCIATION ON THE ENVIRONMENTAL PROTECTION AGENCY'S BRISTOL BAY WATERSHED ASSESSMENT JUNE 4, 2012

Good evening. For the record, my name is Kara Moriarty and I'm the Executive Director of the Alaska Oil and Gas Association (AOGA).

AOGA is a business trade association whose mission is to foster the long-term viability of the oil and gas industry for the benefit of all Alaskans. We represent 16 member companies that represent the breadth and scope of the industry in Alaska, that have interests all across Alaska, both onshore and offshore.

AOGA opposes the EPA's Bristol Bay Watershed Assessment because of the dangerous precedent it sets for all Alaska industries, including and especially oil and gas, the state's largest economic driver.

The primary concern expressed by my members is the EPA's unprecedented action of preparing its assessment in advance of any permit application. Moreover, the fact that the agency has rarely used its veto authority and never in advance of permits being issued by other agencies is especially troubling.

My members are also concerned about the impact this action will have on the scientific data collection process; currently, private companies, in an effort to evaluate the projects they are exploring, are the largest producers of scientific data. Because of this, federal and state agencies now expect and rely on the data companies are compiling. The EPA's preemptive action to judge a project before all the data is collected and evaluated will undoubtedly discourage companies from investing in prospective scientific activities. Everyone loses under this scenario.

Bottom line, every potential development project should have an opportunity to be reviewed on its merits. The fact that the EPA is taking this action now would set a new and dangerous precedent for Alaska projects; my members rightly worry that the EPA will next target the state's oil and gas projects and use such a tool to essentially shut down development in a state that depends on oil and gas as the backbone of its economy.

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This risk is unacceptable to my members, and should be to Alaskans who want not only to protect our economy, but also fear that an overreaching federal bureaucracy would unilaterally block development before the process was even allowed to begin. To take such an unprecedented step is dangerous and inappropriate. For these reasons, AOGA opposes the Watershed Assessment.