

Alaska Oil and Gas Association



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Kara Moriarty, Executive Director

June 28, 2013

VIA Federal eRulemaking Portal (<http://www.regulations.gov>)

Bob Perciasepe, Acting Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: EPA's Revised Draft Assessment of Potential Mining Impacts on Salmon Ecosystems of Bristol Bay, Alaska - EPA-HQ-ORD-2013-0189

Dear Mr. Perciasepe:

The Alaska Oil and Gas Association ("AOGA") appreciates the opportunity to provide comments on the Environmental Protection Agency's ("EPA") Revised Draft Assessment of Potential Mining Impacts on Salmon Ecosystems in Bristol Bay ("Bristol Bay Assessment"). AOGA is a professional trade association whose 15 member companies account for the majority of oil and gas exploration, development, production, transportation, and refining activities onshore and offshore in Alaska.

AOGA endorses the comments submitted by the Resource Development Council and the Alaska Miners Association ("AMA") and encourages EPA to consider and incorporate the recommendations contained therein. Together with the resource development industry in Alaska, AOGA remains gravely concerned about the dangerous precedent the Bristol Bay Assessment sets for the responsible development of Alaska's resources. The revised assessment fails to address many of the concerns previously submitted by Alaskan stakeholders. EPA's continued action to assess the impacts of a hypothetical development in advance of any permit application or project proposal is unprecedented and premature.

The Bristol Bay Assessment is an insincere attempt to analyze the impacts of a potential mine development, commonly referred to as the Pebble Project, before a single federal permit or any proposed federal action is triggered in the Bristol Bay watershed. Without site specific development and mitigation plans, EPA's assessment relies on examples of mines from the late 1800s and early 1900s—before enactment of the National Environmental Policy Act ("NEPA")—that are certain to violate modern environmental standards. The Bristol Bay

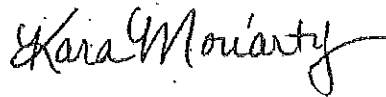
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The Bristol Bay Assessment remains fundamentally flawed and EPA should discontinue work on this unprecedented study. AOGA requests that EPA abandon this assessment and discontinue its analysis until the permitting process is initiated.

The oil and gas industry in Alaska has a long history of partnership with EPA to help ensure that oil and gas operations do not adversely impact the environment and we look forward to continuing this productive relationship into the future. If you have any questions regarding AOGA's comments, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Kara Moriarty". The signature is written in black ink and is positioned above the printed name and title.

Kara Moriarty
Executive Director