

Alaska Oil and Gas Association



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Marilyn Crockett, Executive Director

October 12, 2010

Mr. Craig Perham
U. S. Fish and Wildlife Service
1011 East Tudor Road
Anchorage, Alaska 99503

Addendum to Petition for Promulgation of Regulations
Pursuant to Section 101(a)(5) of the Marine Mammal
Protection Act

Dear Mr. Perham:

The Alaska Oil and Gas Association (AOGA) is a private, nonprofit trade association whose member companies account for the majority of oil and gas exploration, development, production, transportation, refining and marketing activities in Alaska.

On April 23, 2009, AOGA submitted a petition to the U. S. Fish and Wildlife Service to renew regulations, pursuant to Section 101(a)(5) of the Marine Mammal Protection Act, for the non-lethal, unintentional taking of small numbers of polar bears and Pacific walrus incidental to oil and gas exploration, development and production operations and all associated activities in the Beaufort Sea and adjacent northern coast (North Slope) of Alaska for the period of five years beginning August 3, 2011 extending through August 3, 2016. The requested regulations would be the eighth in a series dating from 1993 to the present.

Today we are submitting a minor addendum to the petition, updating information for the Oooguruk Unit. For your convenience I have included section 2.5.9 of the original petition below; the addendum is contained in the underlined last three sentences of this paragraph.

2.5.9 Oooguruk Unit

The Oooguruk Unit is located adjacent to Kuparuk River Unit in shallow waters of Harrison Bay. Pioneer and its partner, Eni, constructed an offshore drill site and onshore production facilities pad in 2006 on State of Alaska leases. A subsea flowline was constructed to transfer produced fluids 9.2 km (5.7 mi) from the offshore drill site to shore. The subsea flowline transitions to an aboveground flowline supported on vertical support members for 3.9 km (2.4 mi) to the onshore facilities for approximately 3.3 hectares (8.2 acres). The offshore drill site (2.4 hectares, 6 acres) is planned to support 48 wells drilled from the Nuiqsut and Kuparuk reservoirs. The wells are contained in well bay modules, with capacity for an additional 12 wells, if needed. Development drilling began in 2007 with unit production commencing in 2008. Pioneer is proposing production facilities West of KRU drillsite

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3S on State oil and gas leases. The contemplated facilities consist of two drillsites near the Colville River delta mouth, a tie-in pad adjacent to DS-3S, gravel roads, flowlines, and power lines. Drilling of the initial appraisal well is planned to start in 2013, with first oil production as early as 2015.

Please let me know if you need any additional information.

Sincerely,

A handwritten signature in cursive script that reads "Marilyn Crockett".

MARILYN CROCKETT
Executive Director