Alaska Oil and Gas Association

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VIA Federal eRulemaking Portal

Tyler Moore
Section Chief
BOEM, Alaska Regional Office
3801 Centerpoint Drive, Suite 500
Anchorage, AK 99503-5823

Re: Draft EIS for Cook Inlet Lease Sale 258
BOEM-2020-0018

Dear Mr. Moore:

The Alaska Oil and Gas Association ("AOGA") appreciates the opportunity to comment on the Bureau of Ocean Energy Management's ("BOEM") draft environmental impact statement ("Draft EIS") for the proposed Cook Inlet Outer Continental Shelf ("OCS") oil and gas Lease Sale 258. AOGA is a professional trade association whose mission is to foster the long-term viability of the oil and gas industry for the benefit of all Alaskans. AOGA's membership includes 14 companies that carry out almost all of the exploration, development, and production of oil and gas in Alaska. AOGA's members have a well-established history of prudent and environmentally responsible oil and gas exploration, development, and production in Alaska.

Alaska's Cook Inlet basin contains large oil and gas deposits that have been actively developed for over 60 years and, during that time, has been the *exclusive* source of natural gas for Alaska's "Railbelt" region, which stretches from Fairbanks through Anchorage to the Kenai Peninsula. Numerous oil and gas fields on the Kenai Peninsula and offshore Cook Inlet have produced over 1.3 billion barrels of oil and 7.75 trillion cubic feet of natural gas. Cook Inlet's natural gas reserves are undeniably essential to meeting the energy needs of Alaska, generating 70 percent of the electricity that powers homes and businesses in communities along the Railbelt.[1] Indeed, BOEM recognizes in the Draft EIS that "[o]il and gas from the Cook Inlet Program Area could help meet regional and national energy needs and lessen the need for imports." Draft EIS, Executive Summary, at 1. In fact, this is an understatement—oil and gas

[1] *See* Michael Redlinger et al., Alaska Dep't of Nat. Res., "Cook Inlet Natural Gas Availability," at 9 (Mar. 2018), https://dog.dnr.alaska.gov/Documents/ResourceEvaluation/CI_Natural_Gas_Availability_Study_2018.pdf (last visited Sept. 21, 2020).

from the Cook Inlet Program Area will not only help meet regional needs, but is *absolutely essential* to the region.

On January 17, 2017, BOEM approved the 2017-2022 Outer Continental Shelf Oil and Gas Leasing Proposed Final Program ("Leasing Program"), which included Cook Inlet Lease Sale 258. Despite lawfully beginning the leasing process for Lease Sale 258 with publication of a Notice of Intent on September 10, 2020, BOEM subsequently, and unlawfully, halted the process as a result of Executive Order 14008's "pause" of new oil and gas leasing. However, Executive Order 14008's "pause" has been enjoined by a federal court and, as required by law, BOEM must proceed with Lease Sale 258.[2] AOGA supports BOEM's decision to resume the lease sale process and timely complete Lease Sale 258.

AOGA recommends that BOEM select Alternative 1, the Proposed Action, which would offer all 224 OCS blocks authorized under the Leasing Program. That alternative was the product of a "targeted leasing model" through which BOEM (under the Obama Administration) *already* took full account of environmental protection and subsistence needs and struck a balanced approach in determining which lease blocks to offer in Lease Sale 258. As explained by BOEM:

> The USDOI's 2012–2017 OCS Oil and Gas Leasing Program introduced a targeted leasing model to the Alaska OCS lease sale process and continued the model in the 2017–2022 National Program. Targeted leasing identifies areas considered for leasing that have high resource potential and clear indications of industry interest, while appropriately weighing environmental protection and subsistence use needs. The goal of targeted leasing is to focus oil and gas leasing on the most promising OCS blocks, while protecting important habitats and critical subsistence activities. The result is an area that is more geographically limited in scope and that eliminates many areas of environmental concern. BOEM used this information to develop the Area Identification (Area ID) for this lease sale.

Draft EIS at 3. Moreover, the leases sold in Lease Sale 258 will include numerous lease stipulations, developed and analyzed through the leasing program process, that minimize and mitigate the effects of any activities carried out pursuant to the leases. *See* Draft EIS at 23-25. Accordingly, there is no lawful or scientific basis for selection of an alternative that further reduces the number of blocks offered in Lease Sale 258 or unreasonably restricts activities on those blocks. Again, AOGA recommends that BOEM select Alternative 1 as the agency's preferred alternative.[3]

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[2] *See State of Louisiana et al. v. Biden et al.*, No. 21-cv-00778 (W.D. La.).

[3] AOGA expresses no view on the content of the lease stipulations or the effects analyses presented in the Draft EIS. This letter should not be taken as AOGA's express or implied agreement with, or support of, the lease stipulations or any element of the Draft EIS's effects analyses or the assumptions supporting those analyses.

AOGA appreciates your consideration of these comments. If you have any questions, please do not hesitate to contact me.

Sincerely,

ALASKA OIL AND GAS ASSOCIATION

Kara Moriarty

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President/CEO