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January 25, 2023

Re: NVN and City of Nuiqsut Comments regarding BLM Willow MDP Preliminary Final FSEIS
Review: January 10 - January 20, 2023

To Whom It May Concern:

The City of Nuiqsut and the Native Village of Nuiqsut (“NVN”) have formally submitted via e-mail last week their respective comments to BLM-Alaska using the required matrix mandated by BLM-Alaska. However, the City Council of Nuiqsut and NVN’s Council have authorized this letter to be used by the City and NVN for distribution to others who do not have access to the BLM-Alaska matrix at this time.

The Bureau of Land Management’s (BLM) engagement with us is consistently focused on how to allow projects to go forward; how to permit the continuous expansion and concentration of oil and gas activity on our traditional lands. We express our concerns, but BLM continues to weaken or waive mitigation measures, or fails to enforce them, and the impact to our daily life continues. We explain how the road will deflect caribou and make hunting more difficult, and BLM hears us asking for more road access. We say the helicopters disturb the caribou, and BLM again hears us asking for more roads. We explain our distress about our air quality from routine activities, and we are confronted with accidents like Repsol and CD1. We point out that it is becoming harder for us to harvest subsistence food, and BLM responds with more research and monitoring (but continued activity). We speak of the significance of our tradition and culture, and BLM schedules meetings during whaling. We emphasize the importance of our life, health, and safety, and we watch as

ConocoPhillips employees are evacuated from CD1. We express concerns about our lack of access to information about the CD1 accident and our fundamental responsibility to protect the people of our village, and we are accused of causing panic and alarm during the blowout. People state opposition to the endless expansion of oil development and the complete encirclement of our village, and they face repercussions. It is therefore with a deep and persevering commitment to protecting our culture, health, and survival that we offer the following comments.

I. The public and cooperating agency process has been deeply flawed

The process for public input on this project has been disappointing and inadequate. Drilling proponents point to the five years this project has been under review, claiming the extensive timeline demonstrates that the plan has undergone thorough consideration. Instead, the lengthy process demonstrates the opposite. The only reason the environmental review has taken this long is because BLM and ConocoPhillips have made repeated missteps along the way:

- In the fall of 2019, the BLM published the first draft EIS and provided for the shortest comment period allowed by law (45 days). Despite our request for an additional 45 days, BLM granted a smaller extension that required us to submit our comments during whaling.
- Even with this stifled public input, ConocoPhillips had no option but to acknowledge that its proposal would cause unacceptable impacts to the Teshekpuk Lake Special Area. It withdrew its proposal and spent the spring of 2020 designing a new proposal. If ConocoPhillips had respected the importance of this area to our way of life in the first place, it would not have lost all that time designing a new proposal.
- In March 2020, BLM published a new draft EIS, just as Covid was requiring us all to stay at home, in fear of our lives. Yet, BLM again allowed only a 45-day comment period and refused to grant any extensions. BLM's virtual public meetings during these early days of Covid were plagued by technological glitches and bandwidth constraints, effectively silencing our voice.
- When the final decision approved the project in December 2020, it was thrown out by the Federal District Court in Alaska, due to the numerous inaccuracies in the EIS and in the Endangered Special Act analysis. If BLM and the Fish and Wildlife Service had conducted a sufficient analysis in the first place, the court would not have had to send it back to the agencies.
- While preparing the supplemental EIS, BLM asked for our subsistence timeline, and then BLM scheduled the comment deadline in the heart of our most important season: In July 2022, BLM released a draft supplemental EIS, again allowing only a 45-day period to comment. We again requested an extension, since the close of the comment period was during the most important time for caribou hunting and while we were preparing for fall whaling.
- In August, BLM committed to extending the comment period for Nuiqsut, but then reversed this decision three days later, without any explanation.

The cooperating agency process does not substitute for the public process. The public process, which is required by law, provides every person with an opportunity to share their views directly with BLM. It also ensures that their views, as well as BLM's responses to their input, are documented. The cooperating agency relationship does not remedy BLM's poor public process.

Moreover, the cooperating agency process has also been deficient. We spent many days engaging with BLM in discussions about mitigation to subsistence and the impacts to our wildlife, air, water, and land. We identified the many flaws in the mitigation measures the agency proposed, but the PFSEIS does not reflect or document these concerns. Instead, it states that the measures are derived from BLM's discussions with us, suggesting that we endorse those measures or that those measures respond to our concerns.¹ As we have explained to BLM throughout the cooperating agency process, none of the suggested mitigation measures will protect subsistence, our health, or our land, individually or collectively.

The flawed cooperating agency process has continued, with BLM releasing the PFSEIS immediately before our meetings with the White House and the Department of Interior during the week of January 9, 2023. We traveled a great distance to share our concerns, but BLM could not wait just one more day, until after we attended those meetings, to hear our concerns about the draft document before releasing the final. In addition, the timing of the release was frustrating, as it gave us no time to review the PFSEIS before those meetings, which meant we were unable to share our concerns about the final document while we were in D.C. Furthermore, we were only given 10 days to review the PFSEIS, rather than the standards two weeks that is normally provided. The poor federal consultation is made even worse by the fact that the North Slope Borough's (NSB) consultation process with Nuiqsut was also flawed. During the rezoning process which was required under municipal law, the former Planning Director withheld the Mayor of Nuiqsut's written comments from Planning Department staff until after the department issued its recommendation to the NSB Assembly, effectively silencing the input of the City government.

Finally, BLM's failure to include the response to comments on the DSEIS in its release of the PFSEIS prevents us from assessing how BLM took various concerns into account. For example, as ConocoPhillips itself explains, the company has "made significant changes to the project including changes to infrastructure location, size, facilities, and projected aircraft and vehicle traffic. BLM has not adequately analyzed these changes in its supplemental draft EIS."² BLM's initial response to this concern was that such brevity was in line with Secretarial Order 3355. Yet this Order has been revoked by Secretarial Order 3398, and BLM has not modified this or any of the other outdated responses in Appendix B.3. In the absence of adequate information about the current project proposal and an updated response to comments, the comments we provide to you now are unfortunately and unnecessarily incomplete.

Providing equal access to the decision-making process is a fundamental requirement of environmental justice, but the people of Nuiqsut, who would be most impacted by Willow, have had the least access to decision-makers in this process.

II. BLM must adequately address the impacts of uncontrolled gas releases

BLM cannot successfully build trust with our community by dismissively stating that the chances of a gas blowout "would be very low"³ and that "there is no cause for concern,"⁴ especially after the

¹ PFSEIS, Appendix I-1 at 39.

² *Id.*, Appendix B-3 at 60.

³ *Id.* at 422.

experience we had last spring with the blowout at CD1. No community should have to experience the fear, anxiety, and confusion that we faced during that accident.

BLM should not approve additional wells until the investigation of the accident has been concluded. To date, the only information we have is from the company itself, not the regulators who oversee these wells. But even BLM's summary of ConocoPhillips' report is incomplete and misleading. The PFSEIS fails to include any discussion at all about the impacts to air quality from uncontrolled gas releases. With respect to the CD1 blowout, the PFSEIS states that it was the result of exceeding well pressure limitations and that this deviation went unnoticed. It also explains that the source of the gas was from an interval that had not been previously identified as one with significant hydrocarbons.⁵ What the PFSEIS avoids disclosing is that these mistakes were the result of multiple human errors for which ConocoPhillips is responsible. BLM fails to acknowledge that even in a place where ConocoPhillips has been drilling for decades and where company staff thought they understood the underlying geology, releases - some of which may be very serious - will occur.

ConocoPhillips' report also discusses the role that thawed permafrost played in enabling the gas to escape from multiple locations throughout the well pad. But the PFSEIS fails to discuss this risk, even though the EPA expressly advised that BLM do so, and to "outline steps that will be taken to mitigate or avoid similar incidences from occurring for the lifetime of the Willow Project."⁶

The PFSEIS discussion of impacts from the CD1 blowout amounts to one, hollow sentence: "The event did not result in harm or damage to wildlife or the surrounding tundra; natural gas was not detected anywhere off the CD1 pad or in Nuiqsut (approximately 9 miles to the south)."⁷

BLM entirely ignores the financial impacts to the people in our village, some of whom lost their jobs when they made the decision to leave town to protect the health of their families.

The PFSEIS also ignores the risks we faced, and continue to face in the future, such as the risks to the subsistence hunters who were out on the land, near CD1, and who we could not contact. Nor does BLM consider the threats to the elders and the people with health problems, who would be most at risk if the gas line to Nuiqsut had to be shut off.

BLM makes no mention of the fear people felt, especially those who were experiencing unexplained headaches, difficulty breathing, and nausea and those whose health had been affected by the Repsol blowout. During the accident, we requested real-time data about the air pollution in Nuiqsut. Reports are posted on the North Slope Science Initiative website, but the first VOC report covering the period of the blowout was not uploaded to the NSSI website until over a week after the air sample was taken. The subsequent daily samples were not reported until around five days after they were

⁴ *Id.*, Appendix B-2 at 17.

⁵ *Id.* at 423.

⁶ Comments from EPA Region 10 to Stephanie Rice BLM, re Draft Supplemental Environmental Impact Statement for the Willow Master Development Plan (August 29, 2022) [EPA Letter].

⁷ PFSEIS at 423.

taken.⁸ Unless we can use the information in real time to make decisions about how to protect our health, this information is unhelpful.

BLM also fails to discuss the breakdown in communication that took place during the accident, when people in our village had no information about the risks but saw ConocoPhillips' employees being evacuated, when our village leadership was excluded from emergency meetings, and when public questions and concerns could only be submitted to a website. The PFSEIS omits any discussion of the severe stress we faced, and the ongoing effect on our mental health, of experiencing that event and knowing that the regulatory agencies have done nothing to prevent a similar event in the future or to require adequate emergency preparedness and response before the next accident occurs. BLM refuses to acknowledge a fundamental fact: the agencies have failed to manage our land in a way that allows us to feel protected. This has consequences on our mental health.

III. BLM must consider an alternative that protects our subsistence and traditional way of life

The PFSEIS fails to provide any alternative that would protect subsistence. BLM does not, despite EPA's recommendation,⁹ describe the monetary value of subsistence foods that may be lost due to Willow. However, over 70% of households use subsistence resources for more than half of their diet. To replace these foods with store-bought food it would cost every household nearly \$30,000 per year.¹⁰ This loss of millions of dollars per year to the people of Nuiqsut doesn't include the social and cultural costs from their loss of subsistence.

Despite this and other omissions, the PFSEIS is filled with examples of how the project will be harmful to the health of our community. The PFSEIS states that "the Project may significantly restrict subsistence uses for the community of Nuiqsut under all action alternatives due to a reduction in the availability of resources caused by alteration of their distribution and a limitation on subsistence user access to the area."¹¹ BLM acknowledges that even as it permitted GMT 1 and 2, it was aware of the significant impacts to subsistence those projects would entail and points out that Willow's impacts would not only be additive to those impacts, but would also be greater, due to the larger size of the Willow development.¹² BLM also acknowledges that the "effects on subsistence harvester access or subsistence resource availability would adversely affect the Nuiqsut community. These, as well as effects on social connections and cultural continuity, and mental health may be adverse and would be disproportionately borne by the Nuiqsut population."¹³ The PFSEIS also documents the food insecurity our community faces and the limited and inadequate health data that exists for Nuiqsut.¹⁴ As BLM notes, we are living in a human corral, surrounded by oil infrastructure and activity on all sides, and the project will makes things even worse.¹⁵ EPA similarly finds that the

⁸ <https://catalog.northslopescience.org/dataset/3016>

⁹ EPA letter.

¹⁰ PFSEIS at 287.

¹¹ PFSEIS at 363.

¹² *Id.* at 417.

¹³ *Id.* at 362.

¹⁴ *Id.* at 368, 378.

¹⁵ *Id.* at 415.

“proposed project has the potential to have significant environmental justice and climate impacts.”¹⁶ Yet, despite the extensive discussions about the harm our community will face, all the action alternatives proposed by BLM would have the same (significant) impacts to subsistence.¹⁷

We request that BLM include consideration of an action alternative that would meaningfully reduce impacts to subsistence, as required by the National Environmental Policy Act and the Alaska National Interest Lands Conservation Act. Such an alternative should include - but not be limited to - the deferral of additional drill pads, which BLM states that it is considering.¹⁸

As we explained many times throughout the cooperating agency process, and again most recently in our meetings in Washington, D.C., one of the greatest threats of the proposed project is the extension of the road farther into caribou habitat. All the proposed pads and accompanying roads extend into undeveloped areas that are important habitat for the Teshekpuk Lake Caribou Herd and risk additional deflections to the migration and harm to our subsistence hunting. The northern arm of the road would cross Fish Creek, a key area for caribou hunting. It would also encroach into the narrow bottleneck the caribou travel through when they migrate from Teshekpuk Lake towards our village during the fall migration. This means the road, even the somewhat shortened road in Alternative E, is likely to deflect them away from our village, making it much more difficult for us to hunt. Despite BLM’s statements to the contrary, the construction of this road is unjustified.

The road extending north and the chosen location for a the gravel mine would require exceptions to Lease Stipulation K-1, which BLM claims “would be required under all action alternatives.”¹⁹ BLM also proposes to waive LS K-2 and LS K-5.²⁰ Contrary to BLM’s assertion, an exception to a lease stipulation is never “required,” since it is a condition of the lease.²¹ Enforcement of the lease stipulations is not only reasonable, but also a fundamental obligation of BLM as part of its management and protection of the NPR-A’s surface resources. If ConocoPhillips is unable to design a project that complies with the stipulations in its leases, BLM should deny the application, not waive the stipulations.²²

BT1 would allow ConocoPhillips to access 48% of the oil at the Willow prospect.²³ All the additional wells would provide access to far less oil but would cause significant impacts to our subsistence. As the PFSEIS explains, roads will deflect caribou even when no activity is taking place

¹⁶ EPA, Comments on DSEIS, Aug. 29, 2022.

¹⁷ PFSEIS Appendix E.16 at 49-51.

¹⁸ *Id.* at 11.

¹⁹ PFSEIS at 41.

²⁰ Appendix D-1 at 116.

²¹ The lease “[r]ights granted are subject to applicable laws, the terms, conditions, and attached stipulations of this lease, the Secretary of the Interior’s regulations and formal orders in effect as of lease issuance.” See BLM, Offer to Lease and Lease for Oil and Gas, Tract No. 2008-H-017 at 1 (Dec. 16, 2008) (Sample Willow Lease).

²² *N. Alaska Env’t Ctr. v. Kempthorne*, 457 F.3d 969, 976 (9th Cir. 2006) (finding that “BLM can deny a specific application altogether if a particularly sensitive area is sought to be developed and mitigation measures are not available.”).

²³ PFSEIS, Appendix D-1 at 113.

and will also deflect them when traffic is at low levels, below normal operations.²⁴ Yet all action alternatives involve heavy road use for multiple years.²⁵ Therefore, If BLM approves any drilling at all, we request that it only approve BT1 and defer approval of any additional wells. Additionally, to have any chance of protecting our ability to continue subsistence hunting in the future, the approval of BT1 must be accompanied by each of the following conditions:

- Before the start of construction, BLM will conduct monitoring of caribou behavior and distribution to establish a baseline against which subsequent behavior can be compared. This will include telemetry studies of collared individuals and broader population-focused aerial surveys.
- To the extent that any of this data has already been collected, the results be made publicly available. The results of all additional studies will also be made publicly available.
- During construction, BLM will continue monitoring. This will include a representation of overall density and distribution and a detailed study of movement behavior. BLM will provide an analysis of whether there are statistically significant differences in distribution and behavior compared to the pre-construction studies. These analyses will be conducted by season, using seasonal breaks such as reported in Person et al. 2012 and Fullman et al. 2021, since caribou movement behavior and distribution varies widely between seasons.
- During construction, BLM will collect and publicly report road traffic amount, timing, and location to allow an analysis of construction activity impacts on caribou distribution and behavior.
- BLM will also collect acoustic data before and during construction. The receivers will be placed in locations radiating out from the construction location in multiple directions and for long distances to provide an indication of the the sound footprint of industrial construction.
- BLM will also conduct caribou stress hormone analysis before, during, and after construction and make this information publicly available.
- BLM will collect subsistence harvest data for caribou before, during, and after construction.
- During pad operation, all the data above will continue to be collected and compared with pre-construction data to indicate whether there are impacts on caribou or subsistence harvests.
- Due to the high year-to-year variability in caribou movement patterns and habitat use, BLM will not approve any additional wells until this monitoring has taken place for five years.
- If differences in caribou behavior, distribution, or harvests are detected, BLM will prohibit future development of pads.
- BLM will include the above requirements in both the ROD and as a Condition of Approval on the approved APD.

IV. BLM must conduct a more comprehensive analysis of impacts to our health and include meaningful measures to protect the health of Nuiqsut residents

The PFSEIS does not adequately consider impacts to air quality. BLM claims that because modeling results show compliance with federal and state air quality standards, no significant air quality impacts will occur. Yet, an examination of Nuiqsut health data shows that significant impacts due to air quality are already occurring, and any additional air pollution, including from Willow, will be cumulative to these impacts. In addition, as the 2020 Record of Decision acknowledged, “The

²⁴ *Id.* at 234.

²⁵ *Id.*, Appendix D.1, Tables D.5.5.5 through D.5.5.8.

project would increase air and noise emissions and human activity in Nuiqsut's subsistence use area. This could increase stress in some Nuiqsut residents and lead to or exacerbate mental health issues such as anxiety and depression."

We appreciate the inclusion of the results of HAP monitoring from 2018 until 2021, but the data for all years since 2014 should not be presented together, since it obscures information about the trend in HAPs since development in the NPR-A began. Despite this lack of precision, the data shows that five of the six monitored HAPs have been detected at the Nuiqsut Monitoring Station.²⁶ As recommended by EPA, BLM should require monitoring of additional HAPs, including acetaldehyde, carbon disulfide, carbonyl sulfide, ethylene glycol, naphthalene, and 2,2,4-trimethylpentane. BLM must provide evidence and an explanation for its unsubstantiated conclusion that impacts from additional HAPs "are expected to be less substantial than those from the six included HAPs."²⁷

The air quality analysis omits essential information. This information must be gathered and included in the EIS. If the information is unavailable or if the costs of obtaining it are exorbitant, BLM must discuss what effect the missing information may have on the agency's ability to predict impacts.²⁸ For example, data for Criterial Air Pollutants have not been reviewed for PSD by ADEC or EPA.²⁹ In addition, BLM acknowledges that the data for particulate matter and ozone but the agency fails to explain why this information is unavailable or discuss the effects that these information gaps have on the agency's ability to assess the impacts of pollution from Willow.³⁰

We appreciate some of the additional suggested mitigation measures regarding air pollution, which should be further strengthened to adequately address our concerns. BLM proposes to install one air quality monitoring station for every five drill site pads or single processing facility at a predominantly down-wind location on a gravel pad used to directly support drilling or operations. BLM states that this data would be "made publicly available in real time through the North Slope Science Initiative website."³¹ BLM also proposes to expand air monitoring capability in Nuiqsut to monitor for HAPs, VOCs, and PAHs, and to make this data publicly available in near real time.³² Finally, BLM proposes that a third-party contract operate and maintain the air quality monitoring station and develop a training program for Nuiqsut residents to operate and maintain the monitoring station.³³

These measures must be strengthened in several ways. First, it should be clarified that the City or Native Village of Nuiqsut will have full control over the monitoring station and data. BLM asserts that although ConocoPhillips owns the monitoring station, "the data collected are designed and operated in accordance with applicable EPA PSD regulations and guidance documents." This does not assure the independence of the monitoring or provide our community with confidence that the

²⁶ PFSEIS at 59, table 3.3.3.

²⁷ *Id.*, Appendix E.3.B.1 at 2-18.

²⁸ 40 C.F.R. § 1502.22(a); *see also* 43 C.F.R. § 46.125.

²⁹ PFSEIS, Appendix E.3A Air Quality Technical Information at 12, Table E.3.4.

³⁰ *Id.* at 80.

³¹ *Id.*, Appendix I.1 at 40.

³² *Id.* at 43.

³³ *Id.* at 44.

data reported is reliable, adequate, or measures the ranges of pollutants that are relevant. Providing oversight, management, and funding to a 3rd party contractor does not alleviate our concerns, as the contract will inevitably feel some degree of pressure from ConocoPhillips, as the funder of the 3rd party contract.

Second, as explained above, the data provided on the NSSI website is not “real time.”

Third, even for monitoring conducted by ConocoPhillips, there must be a protocol established for whenever the company has air pollution-related concerns. The failure of the company to communicate in an immediate, clear, and consistent way with our village during the CD1 accident demonstrates the need for this protocol. The company was evacuating its own employees but had told us nothing about the accident.

Fourth, any monitoring equipment should be accompanied by an alarm that will alert people conducting traditional and cultural activities in the area that adverse conditions are occurring.

Fifth, air quality monitoring must be installed throughout our subsistence use areas – not just at the development site and in Nuiqsut.

Sixth, the monitors should sample air continuously. Although the CO, NO₂, SO₂, and O₃ instruments capture data nonstop, the data is reported in terms of hourly averages, which can obscure shorter periods of concern. Similarly, the samples from PM₁₀ and PM_{2.5} should not be averaged over a 24-hour period, and these two pollutants should also be captured continuously.

Seventh, ConocoPhillips should be required to fund the creation of an emergency response plan that would be used if air quality reaches unhealthy levels.

Finally, and most importantly, BLM should establish clear thresholds for all pollutants of concern which, if exceeded, would require the immediate shut down of all polluting activities. These thresholds should not be based on EPA limits, but instead should be calibrated to ensure protection of children and elderly. BLM should consult the Textbook of Children’s Environment Health, which explains why lower thresholds are necessary to protect children and provides useful policy recommendation.

BLM also suggests mitigation specifically aimed at flaring, which would require ConocoPhillips to coordinate the timing of flaring at its Kuparuk, Alpine, and Willow developments. This measure is inadequate because the variation on timing does not actually reduce overall air pollution. BLM estimates the number of times flaring will be required and describes the reasons that would justify flaring, but the agency should require the company to report the reason for flaring each time it does so. BLM should also require the company to notify Nuiqsut before any flaring occurs. In addition, BLM should establish clear thresholds for flaring, which, if exceeded, will require the shutdown of activity.

BLM also suggests the development of an ongoing contamination study and monitoring of water quality, permafrost, and vegetation near sites where hydraulic fracturing or deep well injection is occurring. While we appreciate the agency’s recognition that this information is important, we

believe it can and should be gathered before development at Willow is permitted. BLM should conduct these studies at existing sites, for example at Alpine, GMT1, and GMT2. We have already provided extensive evidence and testimony about our concerns about contamination to our land, water, and subsistence. Ample evidence exists throughout the US, and the world, about the harmful impacts of oil and gas development and its disproportionate impact on environmental justice communities. It is deeply disturbing that the agency proposes to move forward with additional activity not withstanding this evidence and to suggest that a more thorough study of the impacts that will inevitably occur is somehow "mitigation."

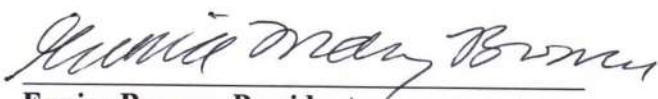
The Alaska Fiscal Model Parameters do not accurately reflect cash flow associated with the NPR-A Impact Aid program. Royalty revenues are potential associated with Federal and private lands. There is no discussion of the complex nature of the formula that includes Royalties, Rents, Bonuses and Lease revenues that are all restricted revenues to use for Impact Grants.

The oil price assumption used by the State is quite low, well below the level that industry has historically maintained as an economic threshold for new development. The State Royalty estimate is likely not accurate and that calls into question the accuracy of the other assumptions.

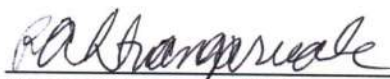
Employment projections have historically been off in these BLM analyses. Seasonal and year-round jobs, and Slope based versus Anchorage jobs are only estimates. During the public comments with the agency the issue of actual local employment was raised, but does not seem to be addressed in the BLM analysis.

Finally, the run-off/drainage from industry roads into our local and regional rivers and lakes has been not been addressed in a meaningful, pro-active way by the agency. Likewise, dust control from the use of these industry roads continues to be a serious problem for our residents. These issues have undoubtedly contributed to abnormalities found in the fish caught in our waterways.

Respectfully submitted,



Eunice Brower, President
NATIVE VILLAGE OF NUIQSUT



Mayor Rosemary Ahtuanguak
CITY OF NUIQSUT