

February 21, 2024

The Honorable Representative Tom McKay
Chair, House Resources Committee
Alaska State Capitol
Juneau, Alaska 99801

RE: AOGA Support for House Joint Resolution (HJR 20)

Dear Chairman McKay,

I'm writing to express the support of the Alaska Oil & Gas Association (AOGA) for House Joint Resolution 20 (HJR 20), sponsored by Representative Baker, *"A resolution urging withdrawal of proposed Bureau of Land Management regulations affecting the National Petroleum Reserve in Alaska; and, urging meaningful engagement with tribes, local governments, and affected communities."*

We appreciate Representative Baker's introduction of HJR 20 as it aligns with AOGA's strong opposition to the Bureau of Land Management's (BLM) proposal to issue new regulations governing the management of surface resources and Special Areas in the National Petroleum Reserve in Alaska (NPR-A). AOGA submitted comprehensive comments to BLM on this proposed rule last December, enclosed, expressing our grave concern with the proposed rule. In summary, if implemented, the proposed rule, which presents many new substantive standards and procedural requirements, would be a complete shift in BLM management of the NPR-A, raising into question the legality of the rule.

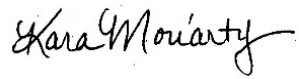
AOGA's 15 member companies account for the majority of oil and gas exploration, development, production, transportation, refining, and marketing activities in Alaska. The majority of the state's current oil production comes from the North Slope and significant AOGA member activities occur on NPR-A leases. Should the proposed rule be approved in its current state, it would have a substantial and adverse impact on future proposals for new activities and developments in the NPR-A. This conflicts with the intent of promoting private oil and gas leasing in the NPR-A as directed by Congress as well as the rights of current NPR-A lease holders.

Furthermore, AOGA and its members are deeply troubled by the haphazard process BLM has embraced throughout this rule making in a blatant attempt to rush this very consequential rulemaking. HJR 20 outlines the serious ramifications this rulemaking would have for local communities, and our State as a whole. Any such federal rulemaking, especially one of this magnitude, should allow for thorough vetting, including meaningful engagement with stakeholders and a complete economic analysis-- neither which were present here.

HJR 20 makes an appropriate request to BLM to withdraw the proposed rule and engage in meaningful and substantive dialogue with local stake holders. By supporting this resolution, the Alaska Legislature will continue its commitment to a fair and balanced regulatory approach for the long-term economic and environmental sustainability of the NPR-A.

In conclusion, AOGA would like to thank Representative Baker for introducing this resolution and would urge legislators to support HJR 20.

Sincerely,

A handwritten signature in cursive script that reads "Kara Moriarty".

Kara Moriarty – AOGA President/CEO

Enclosed: AOGA Comments Dated 12/7/2023 Re: Proposed Rule—Management and Protection of the National Petroleum Reserve in Alaska