



International Union of Operating Engineers

AFFILIATED WITH THE AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS

May 4, 2020

Willow MDP/SDEIS Comments
Bureau of Land Management Alaska State Office
c/o Racheal Jones, Project Manager
222 W 7th Avenue #13
Anchorage, AK 99513

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RE: Support for Preferred Alternative B and Module Transfer Option 3, Supplemental to the Draft Environmental Impact Statement for the Willow Master Development Plan

The International Union of Operating Engineers respectfully submits the following comments in support of the Preferred Alternative B and Module Transfer Option 3 in the Supplemental to the Draft Environmental Impact Statement for the Willow Master Development Plan (MDP).

The International Union of Operating Engineers (IUOE) is one of North America's leading construction unions, representing over 400,000 hardworking men and women in the United States and Canada. Most members of the IUOE work in the construction sector, operating and maintaining heavy equipment. Thousands of IUOE members possess specialized training and years of practical experience building the nation's energy infrastructure that powers our country, including such notable projects as the Hoover Dam, the Trans-Alaska Pipeline, and countless power plants and pipelines.

The proposed \$5-\$6 billion Willow Project, a stand-alone development in the Bear Tooth Unit in the National Petroleum Reserve-Alaska (NPR-A), reliably and responsibly delivers American energy and job opportunities. The Project would provide significant employment opportunities to members of the Operating Engineers and other skilled trades and will bring critical revenue and jobs to Alaska and the nation, helping us recover from the devastating economic impacts of the COVID-19 pandemic. The Willow Project could create more than 2,000 construction jobs, plus 300 permanent jobs and generate more than \$10 billion in federal, state and North Slope Borough revenue. Overall, the project will exceed 7 million manhours, with construction expected to last over five years.

BLM's current public comment period should not be paused or extended because projects like Willow are critical to Alaska's economic recovery. The State of Alaska, Department of Natural Resources, provided a letter to BLM on April 3, 2020 which says: "This project will bring critical revenue and jobs to the State and the nation during an essential time." Alaska relies heavily on revenue from North Slope oil production, which has, generally speaking, seen a steady decline in production since its peak in 1988. The Project would help offset declines in production from North Slope oil fields - BLM estimates peak production of 130,000 barrels of oil per day and approximately yield 590 million barrels of oil over the Project's 30-year life.



Production from Willow would serve to help maintain the integrity of the Trans-Alaskan Pipeline System (TAPS), a critical link to America's energy distribution. Given the vast resources believed to be available in the NPR-A, future production could reverse the decline in TAPS, allowing it to remain viable for decades. Prohibiting development and production at Willow would set a dangerous precedent for future development in NPR-A, severely compromising the long-term energy and economic security of Alaska and the nation.

In response to stakeholder concerns and public comments on the Willow Master Development Plan Draft IES (DEIS) released in August 2019, ConocoPhillips submitted an updated project proposal that includes significant changes. The new proposal includes a third module transfer option, construction of a freshwater reservoir, and up to three boat ramps for subsistence use. The Module Option 3 would allow for delivery of the heavier module first to Oliktok Dock, then using existing gravel roads and land-based ice roads for transporting modules to the site of the Willow Central Facility. This makes a temporary gravel island no longer necessary.

The Willow MDP is consistent with the BLM's issued Integrated Activity Plan (IAP) for the NPR-A and complies with all of its obligations under the National Environmental Policy Act. The proposed Project minimizes environmental impacts and maintains high standards for safety and emergency response.

ConocoPhillips employs rigorous standards to protect the environment and subsistence resources. They have an excellent track record and long history of operating responsibly and working with stakeholders on the North Slope and in the Arctic. Alternative B reflects feedback that ConocoPhillips received from North Slope stakeholders and demonstrates its willingness to work with communities to minimize the impact of the project. Alternative B would also reduce environmental impacts compared to other alternatives by using less gravel fill, fresh water, and aircraft flights, while improving year-round access for local residents.

Extensive mitigation and engineering design features are incorporated into the Willow project. For instance, pipelines will be elevated to at least 7 feet and separated from roads to allow for caribou movements. Extended reach drilling technology has decreased the size of drill site pads by 15-20 percent, dramatically reducing the footprint in the North Slope. Spacing considerations in road and pipeline construction facilitates caribou movement minimizing disturbance to vulnerable wildlife. The DEIS references over 270 mitigation efforts and concludes, in section 3.19, that the cumulative effects of the project will not have a significant impact on the natural and human environment.

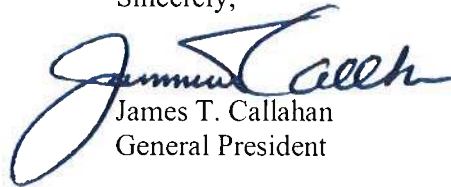
Since the construction of the Alpine facility in the North Slope, subsistence harvests of all key resources in Nuiqsut have remained strong. Caribou harvest have exceeded the average over the past few years since the construction of the CD5 drill site, Greater Mooses Tooth 1 (GMT1), and Greater Mooses Tooth 2 (GMT2). Nuiqsut hunters are increasingly using roads to hunt year-round. Harvest numbers are increasing around infrastructure, which is a good indicator that caribou are not avoiding the infrastructure area.

The Willow Project will not have a significant impact on the environment, and it will maintain high standards for safety. This project will also put many Operating Engineers to work, along with others in the skilled trades. These jobs pay family-sustaining wages and offer strong health and pension benefits. Furthermore, construction of this project will provide much needed revenue to Alaska and the North Slope community.

The IUOE strongly encourages the Bureau of Land Management to approve the Preferred Alternative B and Module Transfer Option 3, Supplemental to the Draft Environmental Impact Statement for the Willow Master Development Plan.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "James T. Callahan". The signature is stylized with a large, looping initial "J" and a distinct "Callahan" at the end.

James T. Callahan
General President