



ALASKA OIL & GAS ASSOCIATION
People. Pride. Petroleum.

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Kara Moriarty, President & CEO

January 30, 2024

Representative Jesse Sumner, Chair
House Labor & Commerce Committee
State Capitol, Room 421
Juneau, AK 99801

RE: AOGA Opposition to HB 186, Volunteer Labor Compliance Officer

Dear Representative Sumner,

On behalf of the Alaska Oil & Gas Association (AOGA), I'm writing to express our opposition to HB 186, sponsored by the House Labor & Commerce Committee, to establish a volunteer labor compliance officer program. AOGA is the professional trade association for the oil and gas industry, representing the majority of exploration, production, transportation, and refining activities in Alaska. Our mission is to advocate for the long-term viability of the industry in our state.

While AOGA applauds the intent as described in the bill's sponsor statement to promote compliance with Alaska's labor laws, educate workers about their rights, and ensure a fair and competitive construction industry, the oil and gas industry has grave concerns about creating a program made up of volunteers, granting these volunteers sweeping authority to enter a place of employment and inspect records without any guardrails or boundaries. Much of the testimony received by the House Labor and Commerce Committee on HB 186 has focused on volunteer compliance officers and public construction projects. However, this program would also apply to private construction projects throughout Alaska.

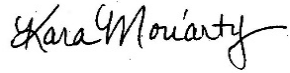
For a multitude of reasons, including the nature of our business, and the safety of our workforce, oil and gas facilities in Alaska are not accessible to the public. Allowing volunteer compliance officers broad authority to enter our facilities, wander worksites and inspect records will create immense security and safety challenges for our industry. Our membership is incredibly anxious at the thought of volunteers having access to our proprietary operations, including but not limited to, pipelines, drilling rigs, refining facilities, construction pads, process facilities, marine terminals and more. Security risks to our industry are genuine and it is quite fathomable, nefarious intended individuals could utilize this well-intentioned program to cause harm to our industry, State, and/or Country.

We believe investigations as contemplated in the bill should only be conducted by state employees.

Knowing your strong support for the oil and gas industry, this is likely an unintended consequence of the effort to improve the well-being for Alaskan workers, but it is our responsibility to officially state our opposition to a program designed to allow volunteers such wide and free reigning access.

We hope your original intent can be maintained in a manner that allows our industry the ability to restrict access as is our current practice.

Sincerely,

A handwritten signature in black ink that reads "Kara Moriarty". The signature is written in a cursive, flowing style.

Kara Moriarty – AOGA President/CEO
CC: House Labor & Committee Members