



**Jeff B. Gustavson**  
Vice President, Mid-Continent Business Unit

March 12, 2019

**Via Online Submission:** [<https://www.blm.gov/programs/planning-and-nepa/plans-indevelopment/alaska/coastal-plain-eis>]

Ms. Nicole Hayes  
Bureau of Land Management, Alaska State Office  
Attention - Coastal Plain Oil and Gas Leasing Program EIS  
222 West 7th Avenue, #13  
Anchorage, Alaska 99513-7955

RE: Notice of Availability of the Draft Environmental Impact Statement for the Coastal Plain Oil and Gas Leasing Program, Alaska

Dear Ms. Hayes:

Chevron U.S.A. Inc. ("Chevron") is an integrated energy enterprise involved in all aspects of the energy business: exploration, production, manufacturing, transportation, marketing, and research. Chevron is an active operator in the U.S., with exploration and production operations in California, Colorado, Gulf of Mexico, Louisiana, New Mexico, Ohio, Pennsylvania, Texas, and West Virginia. Chevron also has a long history of involvement in Alaska's oil and gas sector. Chevron is committed to conducting our operations safely and in a manner protective of the environment.

Chevron appreciates the opportunity to provide comments in response to the Notice of Availability of the Draft Environmental Impact Statement (DEIS) for the Coastal Plain Oil and Gas Leasing Program (83 CFR 67337, December 28, 2018). We support BLM's effort to provide a comprehensive evaluation of potential environmental impacts related to the competitive oil and gas program for leasing, development, production and transportation in and from the Coastal Plain.

We believe industry can safely develop the oil and gas resource within the Coastal Plain, in coexistence and protective of the natural and community values of ANWR and Native Lands. This is demonstrated by modern oil and gas operations in Alaska, exemplified by the technological and operational advances made over the years of active development of the north slope. We strongly recommend the final EIS acknowledge and incorporate such advances in its evaluation, lease stipulations and ROPs.

Chevron supports the comments submitted by both the Alaska Oil and Gas Association and the American Petroleum Institute. We believe these organizations have identified key areas of improvement to the DEIS assessment and its technical basis. We are concerned the alternatives defined in the DEIS do not meet the Purpose and Need of the Leasing Program, given the significant extent to which access could be limited through NSO, setbacks and no-leasing stipulations. We find the DEIS does not create a record for why such access limiting

requirements are necessary, given the precedent of the many successful and proven practices elsewhere on AK Federal, State and private lands, which do not so severely limit access.

Specifically, Chevron asks BLM to:

- Acknowledge and incorporate the 2000-acre statutory limit on Coastal Plain development as the primary program stipulation protecting potential impacts related to facility footprint. Shift considerations of further access limitations to within the environmental review of specific project proposals, where the information to make such determinations is provided.
- Not prejudge hydrocarbon potential or preferred development location in the EIS, based upon the current limited and dated seismic information. Instead allow a comprehensive exploration phase to assess the hydrocarbon resource more thoroughly. We believe the statutory requirement to make the highest potential hydrocarbon areas available for leasing cannot be determined without modern 3D seismic and supporting exploration drilling.

Chevron believes responsible development of the Coastal Plain can be carried out to the benefit of the people of Alaska, the environment and the nation. We believe BLM has the opportunity to construct a leasing program to serve these interests and establish a long-term foundation for success on the Coastal Plain.

We greatly appreciate your attention and are happy to further discuss these comments. If you have any questions, please contact Dan Jernigan at (925) 842-8566 or [dkjernigan@chevron.com](mailto:dkjernigan@chevron.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Gustavson', with a large, stylized flourish at the end.

Jeff Gustavson  
Vice President,  
Chevron Mid-Continent Business Unit