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RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

November 9, 2015

Lauren Boldrick
BOEM, Alaska OCS Region
3801 Centerpoint Drive, Suite 500
Anchorage, AK 99503

Re: Liberty Project – Development and Production Plan (Docket ID BOEM-2015-0096) and Environmental Impact Statement (Docket ID BOEM-2015-0068).

Dear Ms. Boldrick:

The Resource Development Council (RDC) is writing to support Hilcorp Alaska's Liberty project off the North Slope. RDC urges the Bureau of Ocean Energy Management (BOEM) to approve the proposed Development and Production Plan (DPP) for the project and to fully consider the economic and other benefits of the project in the Environmental Impact Statement (EIS).

RDC is a statewide business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, tourism and fisheries industries. RDC's membership includes Alaska Native Corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

Hilcorp Alaska's Liberty (Liberty) oilfield contains one of the largest potential sources of new light oil production on the North Slope, with an estimated 80-130 million barrels of recoverable oil. Liberty will help offset declining light oil production on the North Slope and extend the life span and of the Trans-Alaska Pipeline System (TAPS). Liberty has the potential to increase TAPS throughput up to 70,000 barrels per day, which would boost both state and federal revenues and reduce imports from overseas. The project would also provide important tax and economic benefits to the North Slope Borough. It would generate jobs for Alaskans and create new opportunities for Alaska businesses from the North Slope to southern Alaska.

The DPP incorporates existing and recently compiled data, as well as lessons learned from the initial EIS drafted in 1999. The key components of Hilcorp's newly submitted plan for Liberty are based on the very same concepts approved in the prior EIS. These concepts include but are not limited to: proposed island location, gravel island construction, method of construction, on-island drilling and processing facilities, and pipeline routing to shore.

Hilcorp will utilize the construction and operational technology used at Alaska's other offshore facilities. It has proven to be safe and effective means for oil and gas development in the Arctic. Like Liberty, the majority of the artificial islands were constructed in shallow water depths less than 20 feet.

Alaska has a 30-year record of safely operating offshore in the Arctic. For example, the Endicott oilfield has been in operation for almost three decades. Additionally, there are three other offshore fields in production: Northstar, Oooguruk, and Nikaitchuk. In fact, in the past 40 years, 18 artificial islands have been constructed in the Beaufort Sea to support oil and gas exploration and development. The initial discovery of Liberty occurred in the 1980s after an artificial island was built in 1981 and 1982.

RDC cautions BOEM that national environmental groups are aligning to oppose the Liberty project with a goal to stop all future oil and gas development in Alaska's Arctic. The impacts would lead to the premature shutdown of TAPS, Alaska's economic lifeline and a critical strategic energy asset for America. The Liberty project has strong merit and must move forward.

In its recent report, the National Petroleum Council said the U.S. should continue to develop new oil and gas projects in Alaska or risk a renewed heavy reliance on imported oil in the future. In order for the U.S. to keep domestic production high and imports low, projects like Liberty should move forward.

Thank you for the opportunity to comment on these important issues.

Sincerely,



Marleanna Hall
Executive Director