

file



IN REPLY REFER TO:

United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE
1011 East Tudor Road
Anchorage, Alaska 99503-6199



AFES/MMM

DEC 12 2014

Ms. Robyn McGhee
ConocoPhillips Alaska, Inc.
P.O. Box 100360
Anchorage, Alaska 99510-0360

Dear Ms. McGhee:

We have received your requests, dated August 13, 2014, August 21, 2014, September 8, 2014, September 22, 2014, and October 14, 2014, for Letters of Authorization (LOA) for the incidental and intentional take of polar bears associated with the 2015 North Slope of Alaska activities conducted by ConocoPhillips Alaska, Inc. (CPAI).

Enclosed are five individual LOAs that provide incidental or intentional take associated with the various planned activities on the 2015 North Slope of Alaska in 2015:

- LOA 14-16 (CD5 Construction Activities incidental take)
- LOA 14-17 (Well P&A at North Staines River #1 incidental take)
- LOA 14-18 (Winter 2015 Oliktok Point Seismic Program and Drill Site 3S Acquisition Well incidental take)
- LOA 14-19 (Winter 2015 GMT Seismic Program incidental take)
- LOA 14-INT-12 (Kuparuk River Unit and Western North Slope (Alpine and Satellites) intentional take)

LOAs 14-16 to 14-19 authorize the anticipated incidental take of small numbers of polar bears associated with CPAI's planned exploration and development activities for 2015. Detailed descriptions of the authorized activities are provided in CPAI's August 13, 2014, *Request for Letter of Authorization: CD5 Construction Activities in 2015*, August 21, 2014, *Request for Letter of Authorization: Well P & A at North Staines River #1*, September 8, 2014, *Request for Letter of Authorization: CPAI Winter 2014-2015 Oliktok Point Seismic Program and Drill Site 3S Acquisition Well*, and the September 22, 2014, *Request for Letter of Authorization: CPAI Winter 2014-2015 GMT Seismic Program*. All provisions contained within CPAI's Polar Bear Interaction Plan are incorporated by reference into these LOAs.

The four aforementioned incidental take authorizations are issued in accordance with Marine Mammal Protection Act (MMPA) Incidental Take Regulations published in the *Federal Register* (76 FR 47010), dated August 3, 2011, for the Beaufort Sea; please review these regulations.

LOA 14-INT-12 describes CPAI's ability to take polar bears by harassment using non-lethal deterrence activities for the protection of human life, property, and/or the protection or welfare of polar bears while conducting activities in polar bear habitat. This LOA is issued consistent with non-lethal take authorized under Sections 101(a)(4)(A), 109(h), and 112(c) of the MMPA. This directed (intentional) take authorizations is limited to the non-lethal harassment, or deterrence of polar bears and does not authorize lethal take. All deterrent events are to be reported to the U.S. Fish and Wildlife Service, Marine Mammal Management Office within 24 hours. Observation forms can be sent by fax or electronic mail to our office. A final report of all encounters and deterrence events is due 60 days from the expiration of these authorizations. This authorization is effective from the date of issuance to January 15, 2017.

Any situations where the application of deterrents involves a safety risk to personnel should be avoided. If a polar bear interaction escalates into a life threatening situation, Section 101(c) of the MMPA allows, without specific authorization, the take (including lethal take) of a polar bear if such taking is imminently necessary in self-defense or to save the life of a person in immediate danger, and such taking is reported to the Marine Mammal Management Office within 24 hours.

An additional requirement of all five of these LOAs is for CPAI to provide observational data of polar bears throughout the project and a complete report of all observations at the conclusion of the projects to document take. This final report must be provided to the Marine Mammals Management Office within 90 days after completion of the project.

Polar bear conservation has benefited from monitoring programs associated with the Incidental Take program since 1993. Monitoring serves to assess the effect of industrial activities on polar bears by evaluating bear encounter rates, take frequency, as well as the location and timing of encounters. The Service believes that monitoring and protection measures for marine mammals described in CPAI's *Polar Bear Avoidance and Interaction Plan, Revision 6 (January 2012)* is appropriate. If questions or concerns arise during the project period, Service biologists are available for consultation at the phone numbers listed below and noted in your Interaction Plan.

The U.S. Geological Survey has posted information regarding polar bear denning habitat on the Alaska Science Center (ASC) website. The den habitat map (ARC/INFO export file), the mapping manuscript (PDF file) and a picture of den habitat (JPG file) are available on the ASC website: <http://www.absc.usgs.gov/dataproducts.htm>. Use these resources when planning activities in potential denning areas.

If any changes develop in your project during your operations, such as activities or location, the Marine Mammals Management Office (MMM) must be notified prior to the planned operation. This will allow us to evaluate the activity and, if appropriate, amend the appropriate LOA(s).

Ms. Robyn McGhee

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The Service has completed intra-Service consultation under the Endangered Species Act of 1973, as amended (ESA), on the issuance of these LOAs and has determined that issuance of these LOAs is not likely to jeopardize the continuing existence of polar bears. No additional authorization under the ESA is required.

If you have any further questions, please contact Mr. Craig Perham or Mr. Christopher Putnam of our Marine Mammals Management Office, at (907) 786-3810 or (907) 786-3844, respectively.

Sincerely,

Acting 
Chief, Marine Mammals Management

Enclosures

cc: Mr. Richard Shideler, Alaska Department of Fish and Game (email)
U.S. Fish and Wildlife Service, Fairbanks Fish and Wildlife Field Office
U.S. Fish and Wildlife Service, Office of Law Enforcement
North Slope Borough, Department of Law (email)



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AFES/MMM

U.S. Fish and Wildlife Service

LETTER OF AUTHORIZATION Incidental Take (14-16)

ISSUED: January 1, 2015
EXPIRES: December 31, 2015

ConocoPhillips Alaska, Inc. (CPAI) is hereby authorized to take small numbers of polar bears (*Ursus maritimus*) incidental to activities occurring during the 2015 Colville Delta drill site 5 (CD5) Construction Project in the Colville River Delta and National Petroleum Reserve-Alaska (NPR-A) in accordance with regulations listed at 76 FR 47010, dated August 3, 2011.

CPAI proposes to construct ice roads, ice pads, gravel roads, gravel pads, bridges and installation of CD5 facilities, VSMS and pipelines. A full description of activities can be found in the August 13, 2014, letter, *Request for Letter of Authorization: CD5 Construction Activities in 2015*.

This Letter of Authorization (LOA) and the required conditions below apply to all CPAI employees, contractors and personnel performing CPAI-approved work under the scope of operations to be conducted. This authorization is subject to the following conditions.

1. Intentional take is prohibited under this LOA.
2. CPAI's *Polar Bear Avoidance and Interaction Plan, Revision 6 (January 2012)* is approved and all provisions must be complied with unless specifically noted otherwise in this LOA.
3. A copy of this LOA and the approved interaction and avoidance plans listed above must be posted and available for all personnel and in the possession of the operators of all vessels and aircraft engaging in the activities approved under the authority of this LOA.

4. This LOA is restricted to harassment activities and is valid only for those activities identified in the request for an LOA dated August 13, 2014, for the 2015 season. Any additional projects planned for the 2015 season not included in the current request will be presented to the U.S. Fish and Wildlife Service (Service), Marine Mammals Management Office (MMM) as an addendum prior to commencement to be included in the current authorization.
5. CPAI Operations Managers, or designates, must be fully aware, understand, and be capable of implementing the conditions of this LOA.
6. At the discretion of the U.S. Fish and Wildlife Service (Service), CPAI must allow the Service to place an observer on site, including any facilities, vessels, aircraft or vehicles, to monitor the impacts of the activity on marine mammals, when requested.
7. Polar bear monitoring, reporting and survey activities will be conducted in accordance with 50 CFR § 18.128 and must comply with the following monitoring, mitigation and reporting requirements:
 - CPAI must cooperate with the Service, and other designated Federal, State, or local agencies to monitor the impacts of oil and gas exploration activities on polar bears.
 - If any changes develop in the project during the period approved under this LOA, such as activities, location or methods, CPAI must notify the Service, Marine Mammals Management Office (MMM) prior to the implementation of such changes.
 - CPAI must not conduct activities that operate nor pass within one mile (1.6 kilometers) of known polar bear dens, and all observed dens must be reported to the Service, MMM within 12 hours of discovery. If occupied dens are identified within one mile of activities, work within the immediate area will cease and the Service must be contacted for guidance. The Service will evaluate these instances on a case-by-case basis to determine the appropriate action. Potential actions may range from cessation or modification of work to conducting additional monitoring. Conoco must comply with any additional measures specified.
 - A polar bear den detection survey will be required in the areas of potential denning habitat where CPAI proposes to operate prior to the full implementation of this LOA.
 - CPAI must designate a qualified individual or individuals to observe, record, and report the effects of the activity on polar bears to the Service within 24 hours of visual observation.
 - CPAI must submit an annual monitoring report to the Service, MMM as required under 50 CFR § 18.128, which will be received no later than 90 days after the expiration date of the LOA.

This Letter of Authorization is valid for the period indicated on this authorization, unless extended or terminated in writing by the U.S. Fish and Wildlife Service, Marine Mammals Management Office.

Activity 

Chief, Marine Mammals Management

DEC 12 2014

Date



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U.S. Fish and Wildlife Service

LETTER OF AUTHORIZATION Incidental Take (14-17)

ISSUED: January 1, 2015
EXPIRES: December 31, 2015

ConocoPhillips Alaska, Inc. (CPAI) is hereby authorized to take small numbers of polar bears (*Ursus maritimus*) incidental to activities occurring during the 2015 North Staines River #1 Well Plug and Abandonment (P&A) Project on the North Slope of Alaska in accordance with regulations listed at 76 FR 47010, dated August 3, 2011.

ConocoPhillips Alaska, Inc. proposes to finalize the plugging and abandonment of the well at North Staines River #1 drill site. A full description of activities can be found in the August 21, 2014, letter, *Request for Letter of Authorization: Well P & A at North Staines River #1*.

This Letter of Authorization (LOA) and the required conditions below apply to all CPAI employees, contractors and personnel performing CPAI-approved work under the scope of operations to be conducted. This authorization is subject to the following conditions:

1. Intentional take is prohibited under this LOA.
2. CPAI's *Polar Bear Avoidance and Interaction Plan, Revision 6 (January 2012)* is approved and all provisions must be complied with unless specifically noted otherwise in this LOA.
3. A copy of this LOA and the approved interaction and avoidance plans listed above must be posted and available for all personnel and in the possession of the operators of all vessels and aircraft engaging in the activities approved under the authority of this LOA.

4. This LOA is restricted to harassment activities and is valid only for those activities identified in the request for an LOA dated August 21, 2014, for the 2015 season. Any additional projects planned for the 2015 season not included in the current request will be presented to the U.S. Fish and Wildlife Service (Service), Marine Mammals Management Office (MMM) as an addendum prior to commencement to be included in the current authorization.
5. CPAI Operations Managers, or designates, must be fully aware, understand, and be capable of implementing the conditions of this LOA.
6. At the discretion of the U.S. Fish and Wildlife Service (Service), CPAI must allow the Service to place an observer on site, including any facilities, vessels, aircraft or vehicles, to monitor the impacts of the activity on marine mammals, when requested.
7. Polar bear monitoring, reporting and survey activities will be conducted in accordance with 50 CFR § 18.128 and must comply with the following monitoring, mitigation and reporting requirements:
 - CPAI must cooperate with the Service, and other designated Federal, State, or local agencies to monitor the impacts of oil and gas exploration activities on polar bears.
 - If any changes develop in the project during the period approved under this LOA, such as activities, location or methods, CPAI must notify the Service, Marine Mammals Management Office (MMM) prior to the implementation of such changes.
 - CPAI must not conduct activities that operate nor pass within one mile (1.6 kilometers) of known polar bear dens, and all observed dens must be reported to the Service, MMM within 12 hours of discovery. If occupied dens are identified within one mile of activities, work within the immediate area will cease and the Service must be contacted for guidance. The Service will evaluate these instances on a case-by-case basis to determine the appropriate action. Potential actions may range from cessation or modification of work to conducting additional monitoring. Conoco must comply with any additional measures specified.
 - A polar bear den detection survey will be required in the areas of potential denning habitat where CPAI proposes to operate prior to the full implementation of this LOA.
 - CPAI must designate a qualified individual or individuals to observe, record, and report the effects of the activity on polar bears to the Service within 24 hours of visual observation.
 - CPAI must submit an annual monitoring report to the Service, MMM as required under 50 CFR § 18.128, which will be received no later than 90 days after the expiration date of the LOA.

This Letter of Authorization is valid for the period indicated on this authorization, unless extended or terminated in writing by the U.S. Fish and Wildlife Service, Marine Mammals Management Office.



Henry
Chief, Marine Mammals Management

DEC 12 2014

Date



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AFES/MMM

U.S. Fish and Wildlife Service

LETTER OF AUTHORIZATION Incidental Take (14-18)

ISSUED: January 1, 2015
EXPIRES: December 31, 2015

ConocoPhillips Alaska, Inc. (CPAI) is hereby authorized to take small numbers of polar bears (*Ursus maritimus*) incidental to activities occurring during the 2015 winter Oliktok Point Seismic Program and Drill site 3S Acquisition Well in accordance with regulations listed at 76 FR 47010, dated August 3, 2011.

ConocoPhillips Alaska, Inc. proposes to conduct a seismic program in the Greater Kuparuk Area (GKA) on the North Slope. CPAI will also be building an approximately 1.5 mile ice road to drill a core acquisition well North-Northwest of Drill Site 3S in the GKA. The well location will be on an 800-ft by 800-ft ice pad. A full description of activities can be found in the September 8, 2014, letter, *Request for Letter of Authorization: CPAI Winter 2014-2015 Oliktok Point Seismic Program and Drill Site 3S Acquisition Well*.

This Letter of Authorization (LOA) and the required conditions below apply to all CPAI employees, contractors and personnel performing CPAI-approved work under the scope of operations to be conducted. This authorization is subject to the following conditions:

1. Intentional take is prohibited under this LOA.
2. CPAI's *Polar Bear Avoidance and Interaction Plan, Revision 6 (January 2012)* is approved and all provisions must be complied with unless specifically noted otherwise in this LOA.

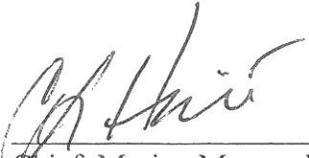
LOA 14-18

3. A copy of this LOA and the approved interaction and avoidance plans listed above must be posted and available for all personnel and in the possession of the operators of all vessels and aircraft engaging in the activities approved under the authority of this LOA.
4. This LOA is restricted to harassment activities and is valid only for those activities identified in the request for an LOA dated September 8, 2014, for the 2015 season. Any additional projects planned for the 2015 season not included in the current request will be presented to the U.S. Fish and Wildlife Service (Service), Marine Mammals Management Office (MMM) as an addendum prior to commencement to be included in the current authorization.
5. CPAI Operations Managers, or designates, must be fully aware, understand, and be capable of implementing the conditions of this LOA.
6. At the discretion of the U.S. Fish and Wildlife Service (Service), CPAI must allow the Service to place an observer on site, including any facilities, vessels, aircraft or vehicles, to monitor the impacts of the activity on marine mammals, when requested.
7. Polar bear monitoring, reporting and survey activities will be conducted in accordance with 50 CFR § 18.128 and must comply with the following monitoring, mitigation and reporting requirements:
 - CPAI must cooperate with the Service, and other designated Federal, State, or local agencies to monitor the impacts of oil and gas exploration activities on polar bears.
 - If any changes develop in the project during the period approved under this LOA, such as activities, location or methods, CPAI must notify the Service, Marine Mammals Management Office (MMM) prior to the implementation of such changes.
 - CPAI must not conduct activities that operate nor pass within one mile (1.6 kilometers) of known polar bear dens, and all observed dens must be reported to the Service, MMM within 12 hours of discovery. If occupied dens are identified within one mile of activities, work within the immediate area will cease and the Service must be contacted for guidance. The Service will evaluate these instances on a case-by-case basis to determine the appropriate action. Potential actions may range from cessation or modification of work to conducting additional monitoring. Conoco must comply with any additional measures specified.
 - A polar bear den detection survey will be required in the areas of potential denning habitat where CPAI proposes to operate prior to the full implementation of this LOA.
 - CPAI must designate a qualified individual or individuals to observe, record, and report the effects of the activity on polar bears to the Service within 24 hours of visual observation.

- CPAI must submit an annual monitoring report to the Service, MMM as required under 50 CFR § 18.128, which will be received no later than 90 days after the expiration date of the LOA.

This Letter of Authorization is valid for the period indicated on this authorization, unless extended or terminated in writing by the U.S. Fish and Wildlife Service, Marine Mammals Management Office.

Acting



Chief, Marine Mammals Management

DEC 12 2014

Date



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LETTER OF AUTHORIZATION Incidental Take (14-19)

ISSUED: January 1, 2015
EXPIRES: December 31, 2015

ConocoPhillips Alaska, Inc. (CPAI) is hereby authorized to take small numbers of polar bears (*Ursus maritimus*) incidental to activities occurring during the 2015 winter GMY Seismic NPR-A Exploration Program in accordance with regulations listed at 76 FR 47010, dated August 3, 2011.

ConocoPhillips Alaska, Inc. proposes to conduct a seismic program in the Greater Moose's Tooth Unit (GMTU) on the National Petroleum Reserve Alaska (NPR-A). No ice roads will be required for this project. Primary access to GMT Seismic location will be by winter snowtucker trail and will exit the project on Alpine & CD-5 ice roads. A snowtucker route starting from Kuparuk DS-2P (Meltwater), crossing the Colville River at, or near, Ocean Point will access the seismic location in the NPR-A. The equipment for the project will be brought in by cat train. The current plan is to start the seismic shoot between January and March 15, 2015. A full description of activities can be found in the September 22, 2014, letter, *Request for Letter of Authorization: CPAI Winter 2014-2015 GMT Seismic Program*.

This Letter of Authorization (LOA) and the required conditions below apply to all CPAI employees, contractors and personnel performing CPAI-approved work under the scope of operations to be conducted. This authorization is subject to the following conditions:

1. Intentional take is prohibited under this LOA.
2. CPAI's *Polar Bear Avoidance and Interaction Plan, Revision 6 (January 2012)* is approved and all provisions must be complied with unless specifically noted otherwise in this LOA.

LOA 14-19

3. A copy of this LOA and the approved interaction and avoidance plans listed above must be posted and available for all personnel and in the possession of the operators of all vessels and aircraft engaging in the activities approved under the authority of this LOA.
4. This LOA is restricted to harassment activities and is valid only for those activities identified in the request for an LOA dated September 22, 2014, for the 2015 season. Any additional projects planned for the 2015 season not included in the current request will be presented to the U.S. Fish and Wildlife Service (Service), Marine Mammals Management Office (MMM) as an addendum prior to commencement to be included in the current authorization.
5. CPAI Operations Managers, or designates, must be fully aware, understand, and be capable of implementing the conditions of this LOA.
6. At the discretion of the U.S. Fish and Wildlife Service (Service), CPAI must allow the Service to place an observer on site, including any facilities, vessels, aircraft or vehicles, to monitor the impacts of the activity on marine mammals, when requested.
7. Polar bear monitoring, reporting and survey activities will be conducted in accordance with 50 CFR § 18.128 and must comply with the following monitoring, mitigation and reporting requirements:
 - CPAI must cooperate with the Service, and other designated Federal, State, or local agencies to monitor the impacts of oil and gas exploration activities on polar bears.
 - If any changes develop in the project during the period approved under this LOA, such as activities, location or methods, CPAI must notify the Service, Marine Mammals Management Office (MMM) prior to the implementation of such changes.
 - CPAI must not conduct activities that operate nor pass within one mile (1.6 kilometers) of known polar bear dens, and all observed dens must be reported to the Service, MMM within 12 hours of discovery. If occupied dens are identified within one mile of activities, work within the immediate area will cease and the Service must be contacted for guidance. The Service will evaluate these instances on a case-by-case basis to determine the appropriate action. Potential actions may range from cessation or modification of work to conducting additional monitoring. Conoco must comply with any additional measures specified.
 - A polar bear den detection survey will be required in the areas of potential denning habitat where CPAI proposes to operate prior to the full implementation of this LOA.
 - CPAI must designate a qualified individual or individuals to observe, record, and report the effects of the activity on polar bears to the Service within 24 hours of visual observation.

- CPAI must submit an annual monitoring report to the Service, MMM as required under 50 CFR § 18.128, which will be received no later than 90 days after the expiration date of the LOA.

This Letter of Authorization is valid for the period indicated on this authorization, unless extended or terminated in writing by the U.S. Fish and Wildlife Service, Marine Mammals Management Office.

Acting 

Chief, Marine Mammals Management

DEC 12 2014

Date



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AFES/MMM

U.S. Fish and Wildlife Service

AUTHORIZATION TO TAKE, BY HARASSMENT, POLAR BEARS 14-INT-12

ISSUED: January 16, 2015
EXPIRES: January 15, 2017

Under sections 101 (a)(4)(A), 109(h), and 112(c) of the Marine Mammal Protection Act of 1972, as amended (MMPA), ConocoPhillips Alaska, Inc. (CPAI) is authorized to take, by harassment, polar bears during slope-wide activities in association with the CPAI-operated North Slope oil fields. This includes, but is not limited to activities to be conducted in the Kuparuk River Unit and Western North Slope (Alpine and Satellites) of Alaska.

The purpose of authorizing taking by harassment, or deterrence, is to maintain human and bear safety and welfare in the North Slope oilfields. Authorizing Level B harassment take reduces the likelihood of death or injury of polar bears. For this reason, this authorization is guided by the following objectives:

- Prevent bears from associating food with humans and facilities.
- “Condition” bears to avoid people (avoidance conditioning).
- Allow bears to use travel routes (natural and man-made) to move along the coast.
- Prevent bears from extended use of areas around facilities.
- Prevent bears from entering the developed parts of the oilfield.

This harassment Letter of Authorization (LOA) is subject to the following conditions:

1. The Polar Bear Interaction Plan (*Polar Bear Avoidance and Interaction Plan, Revision 6, January 2012*) is approved and all provisions, unless noted specifically, are incorporated into this LOA by reference. A copy of the Polar Bear Interaction Plan must be available on site for all personnel.

2. CPAI Operations Managers, or designates, must be fully aware of, understand, and be capable of implementing the conditions of this authorization.
3. This LOA is restricted to harassment activities and is valid only for those activities identified in the request for an LOA dated October 14, 2014, for the 2015 - 2016 slope-wide operating area.
 - Any additional projects planned for the 2015-16 season not included in the current request will be presented to the U.S. Fish and Wildlife Service (Service), Marine mammals Management Office (MMM) as an addendum prior to commencement to be included in the current authorization.
4. This authorization is issued specifically to CPAI who is responsible for ensuring **trained and qualified** personnel are assigned the task to harass (deter) polar bears. A list of trained personnel responsible for deterrence will be on file prior to initiation of activities with the Service Incidental Take Coordinator.
5. CPAI is solely responsible for ensuring that personnel operating under this authorization meet all Federal and State of Alaska laws and regulations regarding the use and carry of firearms should firearms be used for bear deterrence.
6. CPAI, or its designated agent, is responsible for documenting and reporting to the Service, MMM, at (907) 786-3800, all instances involving harassment activities as soon as possible and no later than 24 hours after the occurrence.
7. An annual report of all encounters and hazing events must be submitted to the Service, MMM by the end of the calendar year of the first year. A final report of all encounters and hazing events during the 2 year duration must be submitted to the Service, MMM within 60 days from the expiration date of this LOA.
8. Hazing techniques must not cause the injury or death of a bear. Types of hazing techniques may include, but are not limited to:
 - Bear Guards or Bear Monitors.
 - Air horns.
 - Electric fences.
 - Chemical repellents.
 - Acoustic recordings.
 - Vehicles.

9. Prior to conducting a harassment activity, operators must:

- Make a reasonable effort to reduce or eliminate attractants.
- Secure site; notify supervisor; move personnel to safety.
- Ensure bear has escape route(s).
- Ensure communication with all personnel.

10. When conducting a harassment activity, operators must:

- Choose the method that will have the least effect on the bear and increase the intensity of the method or use additional methods only if necessary.
- Shout at the bear before using a deterrent.
- Move bear in proper direction; continuing with minimally necessary deterrents to receive desired result.

11. After a harassment event has occurred, operators must:

- Monitor bear's movement (to ensure no return).
- Notify supervisor and personnel when it is safe to resume work.
- Fill out report to be sent to the Service as required above, (within 24 hours).

12. Any lethal take or injury of a polar bear must be reported to the Service immediately.

13. This Letter of Authorization is valid for the period indicated on this authorization, unless extended or terminated in writing by the U.S. Fish and Wildlife Service, Marine Mammals Management Office.

Acting Chief

Chief, Marine Mammals Management

DEC 12 2014

Date

