



# United States Department of the Interior



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

IN REPLY REFER TO:

AFES/MMM

JAN 29 2015

Ms. Christina May  
Wildlife Compliance Authority  
BP Exploration (Alaska) Inc.  
900 East Benson Boulevard  
P.O. Box 196612  
Anchorage, Alaska 99519-6612

Dear Ms. May:

We have received your request, dated December 23, 2014, for Letters of Authorization (LOAs) for the incidental and intentional (deterrent activities) take of polar bears during activities associated with the BP Exploration (Alaska), Inc. (BPXA) North Prudhoe Bay 2015 Winter Vibroseis Seismic Survey on the North Slope of Alaska.

In response, and in accordance with regulations listed at 76 FR 47010, dated August 3, 2011, enclosed is LOA 15-06 authorizing BPXA to take small numbers of polar bears incidental to oil and gas exploration activities in association with the North Prudhoe Bay 2015 Winter Vibroseis Seismic Survey on the North Slope of Alaska. Additionally, BPXA has already been issued LOA 15-INT-01 (issued January 15, 2014, expires January 15, 2017), which authorizes BPXA the intentional (deterrent activities) take of polar bears during slope-wide activities in association with the BPXA-operated North Slope oil fields. The activities proposed in your request for intentional take of polar bears, dated December 23, 2014, are already included under LOA 15-INT-01.

BP Exploration (Alaska), Inc. proposes to conduct a three dimensional (3D) seismic survey from mid-February 2015 until sea ice conditions do not allow travel, with post season inspection activities to be completed by mid-September 2015. The survey area lies mainly within the Prudhoe Bay Unit and also includes portions of the Northstar, Dewline, Beechey Point, and Duck Island Units as well as non-unit areas on the North Slope of Alaska and nearby offshore areas. Data acquisition (vibroseis source operation and receiver placement) will occur over approximately 195 square miles, with project support activities occurring outside this area (e.g., logistics, camp locations, transit, staging, services). The approximate boundaries of the total surface area are between 70°13'N and 70°31'N and between 147°47'W and 148°57'W on state and private lands. A detailed description of the proposed activities is provided in BPXA's *Plan of Operations, North Prudhoe Bay 2015 Winter Vibroseis Seismic Survey (October 30, 2014)*.

All provisions contained within BPXA's *Polar Bear and Walrus Interaction Plan for BPXA Areas of Operation* (Document Number: *UPS-US-AK-ALL-ALL-HSE-DOC-00495-2, December 23, 2014*) are incorporated by reference into this LOA. BP Exploration (Alaska), Inc. field camps and personnel shall limit encounters of polar bears by being observant of approaching animals (i.e., the use of polar bear guards) and where practicable, by allowing the animals to pass unhindered. BP Exploration (Alaska), Inc. must also: 1) Provide copies of the polar bear observation form to all contractors operating under the LOA; 2) report any polar bear sightings, or signs of polar bears, such as tracks or excavations, to our office using the polar bear observation report; and, 3) report any possible den locations that are found during work activities immediately to our office. Service biologists are available for consultation if questions or concerns arise during the project period at the phone number listed below and noted in your interaction plan.

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 for self-defense or to save the life of a person in immediate danger, and such taking is reported to the Service within 24 hours.

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 trends and effects of bear encounter rates, take frequency, as well as the location and timing of encounters. Additionally, through monitoring, the Service seeks to limit disturbance to maternal polar bear den sites, both known dens and those areas that could be preferred by denning polar bears. BP Exploration (Alaska), Inc. must use caution when operating near these areas during the maternal denning period (mid-November to mid-April). A polar bear den detection survey will be required in areas of potential denning habitat where BPXA proposes to operate.

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 during the project, such as activities or location, the Service must be notified prior to the planned operation. This will allow us to evaluate the activity and, if appropriate, amend the appropriate LOA(s).

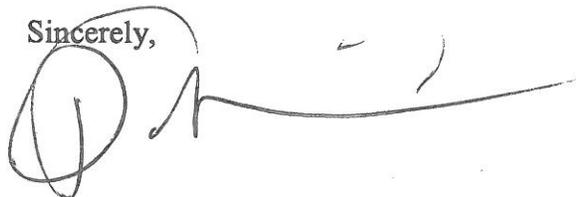
The Service has completed intra-Service consultation under the Endangered Species Act of 1973, as amended (ESA), on the issuance of these LOAs and has determined that the issuance these LOAs is not likely to jeopardize the continuing existence of polar bears. No additional authorization under the ESA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

Ms. Christina May

3

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

Sincerely,

A handwritten signature in black ink, appearing to be 'C. Putnam', written over a horizontal line.

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 (Email)  
U.S. Fish and Wildlife Service, Office of Law Enforcement (Email)  
North Slope Borough, Department of Law (Email)



IN REPLY REFER TO:

# United States Department of the Interior

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



JAN 29 2015

AFES/MMM

## LETTER OF AUTHORIZATION Incidental Take (15-06)

ISSUED: February 1, 2015  
EXPIRES: October 1, 2015

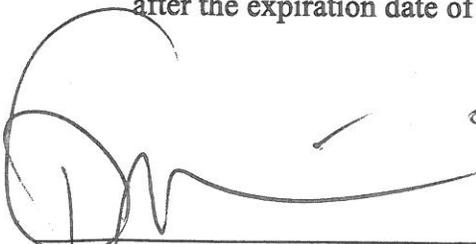
BP Exploration (Alaska), Inc. (BPXA) is hereby authorized to take small numbers of polar bears (*Ursus maritimus*) incidental to activities occurring during the North Prudhoe Bay 2015 Winter Vibroseis Seismic Survey on the North Slope of Alaska.

BP Exploration (Alaska), Inc. proposes to conduct a three dimensional (3D) seismic survey from mid-February 2015 until sea ice conditions do not allow travel, with post season inspection activities completed by mid-September 2015. The survey area lies mainly within the Prudhoe Bay Unit and also includes portions of the Northstar, Dewline, Beechey Point, and Duck Island Units as well as non-unit areas on the North Slope of Alaska and nearby offshore areas. Data acquisition (vibroseis source operation and receiver placement) will occur over approximately 195 square miles, with project support activities occurring outside this area (e.g., logistics, camp locations, transit, staging, services). The approximate boundaries of the total surface area are between 70°13'N and 70°31'N and between 147°47'W and 148°57'W on state and private lands.

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

1. Only incidental take is authorized under this LOA.
2. The BPXA *Polar Bear and Walrus Interaction Plan for BPXA Areas of Operation* (Document Number: UPS-US-AK-ALL-ALL-HSE-DOC-00495-2, December 23, 2014) 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 plan 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. BP Exploration (Alaska), Inc. Operations Managers, or designates, must be fully aware, understand, and be capable of implementing the conditions of this LOA.

5. At the discretion of the U.S. Fish and Wildlife service (Service), BPXA 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.
6. 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:
  - BP Exploration (Alaska), Inc. 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, BPXA must notify the Service, Marine Mammals Management Office (MMM) prior to the implementation of such changes.
  - A polar bear den detection survey will be required each year in the areas of potential denning habitat where BPXA proposes to operate. BP Exploration (Alaska), Inc. completed a den detection survey in December, 2014.
  - BP Exploration (Alaska), Inc. 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. BPXA must comply with any additional measures specified.
  - BP Exploration (Alaska), Inc. 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.
  - BP Exploration (Alaska), Inc. 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.



\_\_\_\_\_  
Chief, Marine Mammals Management

1/29/15  
\_\_\_\_\_  
Date