

# North Slope Borough

## Planning Department

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**Johnny Aiken, DIRECTOR**



August 30, 2006

Mr. William Hauser  
Department of Interior  
Minerals Management Service (MMS)  
Rules Processing Team (RPT)  
381 Elden Street, MS-4024  
Herndon, Virginia 20170-4817  
703-787-1546 (fax)  
[william.hauser@mms.gov](mailto:william.hauser@mms.gov)  
[rules.comments@mms.gov](mailto:rules.comments@mms.gov)

**Re: 30 CFR Part 250, Proposed Amendments to MMS Regulations  
for Oil and Gas Operations in the OCS  
Regulation Identifier Number 1010-AD18**

Dear Mr. Hauser,

The North Slope Borough (NSB) has reviewed the proposed amendments to the Minerals Management Service (MMS) regulations at Title 30 Code of Federal Regulations, Part 250 (30 CFR Part 250), for Oil and Gas Operations in the Outer Continental Shelf (OCS). This letter provides the North Slope Borough's (NSB's) comments on the proposed changes.

The NSB has a stake in the outcome of this proposed change, since the NSB is the local government authority for the northern part of Alaska. Our comments represent the people and the concerns of our communities. The vast majority of the North Slope's people are Inupiat Eskimos. They reside in eight villages, with populations ranging from 139 to 3,469. In total, the region includes 6,290 residents, of which over 70 percent are Inupiat<sup>1</sup>. The Inupiat have inhabited the Arctic for thousands of years,

<sup>1</sup> 2001 Statistics. The NSB is currently updating these estimates, since the population has increased.

traditionally following animal migrations and subsisting on whale, caribou, walrus, seal, birds, fish and other marine, terrestrial, and riverine animal and plant species. Our history, culture and subsistence way of life are directly tied to the marine environment, and oil and gas operations in the OCS pose a significant threat to our subsistence and cultural way of life.

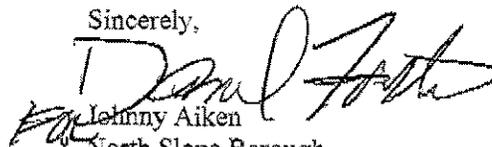
Extensive oil and gas operations are located within the North Slope Borough both on and offshore. The NSB has consistently opposed oil and gas developments in the OCS. While the NSB continues to oppose OCS oil and gas development, we recognize that the federal government does not share this view and continues to move forward with OCS development in the Beaufort and Chukchi Seas despite our strong and continuous opposition. The NSB comments on this regulation should not, in any manner, be considered support for OCS operations in the Beaufort and Chukchi Seas. Rather, our comments are only intended to improve the regulations at 30 CFR Part 250 in the event we are unable to stop oil and gas operations in the OCS.

The proposed regulations changes include a number of improvements for pipelines, platforms and structures conducting oil and gas operations in the OCS. The proposed changes include improvements in reporting requirements after a natural disaster, upgraded requirements to ensure oil and gas drilling structures and pipelines are fit for continued service after a natural disaster, improved mooring hardware standards for floating drill rigs, and upgrades to 3<sup>rd</sup> party inspector verification requirements. According to the proposed regulation background information, many of these changes were recommended as a result of the lessons learned from Hurricane Katrina which impacted OCS operations in the Gulf of Mexico.

Overall the NSB supports the proposed improvements to 30 CFR Part 250; however, we are concerned that the scope of the proposed revisions is focused on oil and gas operations in the Gulf Coast, and does not address the type of natural disasters which could adversely impact oil and gas operations in Alaska's OCS. **The NSB recommends that these proposed regulations be expanded to address the natural hazards (e.g. ice, earthquake, geophysical, subzero temperatures, etc), and the type of equipment used in the arctic to explore for and produce oil and gas.**

Please contact me at (907) 852-0320 if you have any questions on NSB's recommendations or would like to set up a meeting to discuss them further. The NSB requests MMS ADEC provide the NSB a final copy of the regulations with an explanation of how the NSB recommendations were addressed.

Sincerely,

  
Johnny Aiken  
North Slope Borough  
Planning Department Director

Cc: Edward Itta, NSB Mayor  
Taqulik Hepa, NSB Wildlife Department Director  
Karla Kolash, Special Assistant to the NSB Mayor  
Gordon Brower, NSB Planning Department Permitting Supervisor  
Bessie O'Rourke, NSB Attorney  
John Goll, MMS Alaska Regional Director