

Chris Wrobel Permitting Coordinator ConocoPhillips Alaska, Inc. P.O. Box 100360 Anchorage, AK 99510-0360 Phone: (907) 263-4691 Email: Chris.P.Wrobel@ConocoPhillips.com

January 16, 2018

DOG Permitting State of Alaska Department of Natural Resources 550 West 7<sup>th</sup> Avenue, Suite 1100 Anchorage, AK 99501-3563

Re: Greater Kuparuk Road Improvements, DS-2A to DS-2M Kuparuk River Unit

To whom this may concern:

ConocoPhillips Alaska, Inc. (CPAI) respectfully requests an amendment to LO/NS 84-132 in order to improve existing gravel roads between Drill Site 2A (DS-2A) and Drill Site 2M (DS-2M) within the Kuparuk River Unit (KRU). The purpose of the project is to bring existing main roads and drill site access roads up to current engineering standards for the safe and efficient movement of drilling rigs and to stabilize underlaying permafrost.

Additional details are provided in the attached project description, application form, and figures.

If you have any questions or need additional information, please contact me at (907) 263-4691, or at Chris.P.Wrobel@ConocoPhillips.com

Sincerely,

Chi Wulut

Chris Wrobel Coordinator - Permitting

Attachments: Project Description Nine ADNR DOG Unit Plan of Operations Amendment Forms Figures



## **Greater Kuparuk Road Improvements**

### **Project Description**

#### **Project Overview**

ConocoPhillips Alaska, Inc. (CPAI) requests authorization to improve existing gravel roads within the Kuparuk River Resource Development District and Kuparuk River Unit (Kuparuk). The purpose of the project is to bring existing main roads and drill site access roads up to current engineering standards for the safe and efficient movement of drilling rigs and to stabilize underlaying permafrost. Currently, there are various road sections where the existing road height ranges from 1 foot to 4 feet above the ground surface. Areas along the existing roads lack sufficient bearing capacity and during past drilling rig moves, rigs have become stuck, impeding traffic and delaying activities. This project would increase the thickness of selected road sections to approximately 6.5 feet above the ground surface, and increase the width to 35 feet across the road surface. Thicker roads would have a wider and more stable surface that requires less maintenance, allows more efficient drilling rig movement, and provides safer driving conditions.

#### Location

The project is located along the Oliktok Road south of the Drill Site 3N (DS-3N) access road intersection, and east/west along the Spine Road between Central Processing Facility 1 (CPF-1) and DS-2M. The project area also includes the drill site (DS) access roads for DS-3N, DS-2G, and between DS-3M and DS-3I. The project is located within the meridian, townships, ranges, and sections listed below in Table 1.

Meridian, Township, & Range	Section
U11N 8E	23, 24, 26, 27
U11N 9E	1, 11, 12, 14, 15, 16, 19, 20, 21, 29, 32
U11N 10E	5, 6, 8, 9
U12N 9E	2, 3, 10, 11, 15, 22, 23, 25, 26, 36
U13N 8E	25, 36
U13N 9E	28, 33

#### **Project Area**

Approximately 26 miles of roads would be improved. The new road surface will be 35 feet wide for both main roads and drill site access roads. The following dimensions and quantities are conservative estimates based on preliminary information and may be reduced during final design. The new toe-to-toe width will vary from 61 to 81 feet depending on terrain. Road sections will be widened by one foot to 20 feet per side, resulting in approximately 48 acres of new road footprint. Approximately 293,000 cubic yards of gravel would be placed in the new footprint. Additional gravel would be placed on top of the existing road prism for a total gravel volume of 1,300,000 cubic yards. In a single year, up to six miles of road may be improved with up to 300,000 cubic yards of gravel placed in up to 15 acres of new road footprint. Table 2 lists each road segment planned for improvement, along with the associated ADNR LONS, road length, gravel requirements, and acreage of the new footprint (outside of the existing footprint toe). See also the attached Figures.

Road Segment	LONS	Road Type	Road Area	Length (Miles)	Gravel Required (CY)	New Acres
CPF-2 to DS-2B	81-172	Main	CPF2	1.65	62,731	3.55
DS-3K to DS-1Y	81-179	Main	CPF3	7.46	311,297	13.08
MSD to CPF-2	81-180	Main	CPF2	6.45	257,646	11.81
DS-1A to MSC	81-183	Main	CPF1	1.21	47,175	1.75
DS-2G	82-180	Access	CPF2	1.75	96,723	4.35
DS-2B to DS-2A	83-002	Main	CPF2	1.72	73,718	1.63
DS-2A to DS-2M	<mark>84-132</mark>	Main	CPF2	2.80	120,006	2.65
DS-3N	84-137	Access	CPF3	1.30	70,326	2.60
DS-3M to DS-3I	84-138	Access	CPF3	1.84	107,050	3.57

 Table 2. Road Segments Planned for Improvements

#### **Construction Schedule**

Construction is planned from 2018 through 2022 and includes the road types shown on the attached Figures and in Table 2 above. There are no new roads or road extensions planned with this project. Specific road sections will be scheduled year-by-year depending on future drilling objectives. Impacts to migratory birds would be substantially minimized by placing the first lift of gravel on the tundra in April before the migratory bird nesting window begins.

#### **Gravel Source**

Gravel will be sourced from Mine Sites E and C, and potentially F. The project will utilize the nearest available gravel source to reduce driving distances and vehicle traffic.

#### Culverts

Some existing 24-inch surface flow culverts will be replaced as necessary with smooth wall steel pipe. There are no culverts in fish bearing streams planned for replacement.

#### Waters of the U.S.

The expanded footprint is assumed to be Waters of the U.S., primarily wetlands and occasional fill in waterbodies where waterbodies are already adjacent to the existing road prism. Habitat descriptions of the wetlands and waterbodies are provided in the attached letter report from Weston Solutions, Inc. Areas where waterbodies may receive fill are provided in the attached figures from Lounsbury and Associates, Inc. During pre-application meetings with the U.S. Army Corps of Engineers, U.S. Environmental Protection Agency, and U.S. Fish and Wildlife, a wetland delineation and functional assessment (i.e. aquatic site assessment) were determined by the agencies to be unnecessary due to the project's very narrow impact area, its purpose (maintenance), and the presence of existing disturbance along the road edges.

#### **Threatened and Endangered Species**

Both the spectacled eider and the polar bear are listed under the Endangered Species Act and may be found within the project area. Additionally, the project is located within Unit 2, terrestrial denning habitat, of the designated polar bear critical habitat. Both species are covered under the Programmatic Biological Opinion for the 2016-2017 Wetland Impacts of the North Slope. Project construction may occur year-round. Impacts to nesting spectacled eiders would be avoided by placing gravel on the tundra outside of the migratory bird nesting season. The project footprint lacks the topographic relief that would accumulate enough snow to support polar bear denning. Potential effects to transient (non-denning) polar bears that may enter the project area will be minimized through CPAI's compliance with existing and future authorizations under the Marine Mammal Protection Act (MMPA) Letters of Authorization (LOA).

#### **Cultural Resources**

A Cultural Resources survey was conducted for the project. No cultural or historic resources were found near the project area. Results of the survey are summarized in a letter report by Reanier and Associates submitted separately to the U.S. Army Corps of Engineers and the State Historic Preservation Office.

#### **Construction Equipment**

Typical construction equipment may include graders, front-end loaders, dump trucks, and excavators. Fuel would be provided by a refueling service truck. Work will be conducted from existing roads.

#### Other Permits and Authorizations

- North Slope Borough Development Permit
- Alaska Department of Fish and Game Fish Habitat Permit
- U.S. Fish and Wildlife Service, Section 7 Consultation
- Alaska State Historic Preservation Officer Section 106 Review
- Alaska Department of Natural Resources Division of Oil and Gas Unit Amendment
- Alaska Department of Environmental Conservation, Section 401 Water Quality Certification
- Various Pipeline Right of Way (ROW), Letters of Non-Objection



# UNIT PLAN OF OPERATIONS AMENDMENT APPLICATION

State of Alaska Department of Natural Resources, Division of Oil & Gas 550 W. 7th Ave, Suite 1100, Anchorage, AK 99501-3563 Phone: 907-269-8800 Fax: 907-269-8943 Permitting Email: dog.permitting@alaska.gov



SECTION I: APF	PLICANT INFORMATION
1. Applicant:	2. Applicant Contact:
Name: ConocoPhillips Alaska, Inc. (CPAI)	First Chris Last Wrobel Name: Title: Permitting Coordinator
Mailing Address: P.O. Box 100360	Mailing Address: P.O. Box 100360
City: Anchorage	City: Anchorage
State: AK Zip Code: 99510-0360	State: AK Zip Code: 99510-0360
Phone: 907-263-4691 Fax: n/a	Phone: 907-263-4691 Fax: n/a
Email: Chris.P.Wrobel@ConocoPhillips.com	Email: Chris.P.Wrobel@ConocoPhillips.com
3. Unit Name Kuparuk River Unit	
4. Unit Operator Contact:	
First Name: Wendy Last Name: Mahan	Title: Field Environmental Coordinator
Mailing P.O. Box 100360 Address:	
City: Prudhoe Bay State: AK	Zip Code: 99734
Phone: 907-659-7212 Fax: 907-659-7254	Email: N1438@conocophillips.com
Describe the relationship between the Unit Operator and the Applica	nt:
CPAI is the unit operator	
SECTION II: 3RD PARTY INFORMATION	SECTION III: APPLICATION DATE AND NUMBER
(Fill out this section only if you are applying for the Applicant)	
3rd Party Company N/A Name:	Application Date (Office Use Only):
First N/A Last N/A Name: N/A	
Title: N/A	
Mailing Address: N/A	
City: N/A	
State: N/A Zip Code: N/A	
Phone: N/A Fax: N/A	
Email: N/A	
Describe the affiliation to the Applicant:	Application Number: LO/NS 84-132
N/A	
SECTION IV: PI	ROJECT INFORMATION
1. Project Name: KRU Road Improvement Project DS-24	A to DS-2M
2. Proposed Start Date: 4/15/2018	

3. Project Desc	ription:					
-	•	n of Development on file with the	Division's Units	Section?	□ Yes	⊠ No
Describe what ar	nd where:					
River Unit (Kuparul	k). The purpose of the pro	authorization to improve existing gravect is to bring existing main roads an lize underlaying permafrost. Please	nd drill site access	roads up to curr	ent engineering	
		SECTION V: L	AND STATUS			
1. State Mineral	Estate:					
Are supplementa	I pages for land status i	ncluded in Appendix C?		$\boxtimes$	Yes	□ No
Affected ADL:	025586	Date Effective: 2/1/19	65	Date	Assigned:	Unknown
Oil And Gas Less	see(s): CPAI					
Surface Ownersh	nip: State of Alaska					
Do you have, or a	anticipate having an Ac	cess Agreement: 🛛 🖾 Yes		No		
Special Use Land	ds: None identified	-				
Jointly Managed		d				
Other Considerat						
Project	Components	Meridian, Township, Ra	ange, And Sect	ion(s)	GF	PS Coordinates
Add gravel to incre existing roadway	ase width and height of	Umiat, T11N, R08E, Sections 27			N/A Linear	
2. State of Alas	ka Surface Lands:					
Are supplementa	I pages for land status i	ncluded in Appendix C?			] Yes	⊠ No
Oil And Gas Mine	eral Estate Owner: N	/A				
Access Authoriza	ition(s): N/A					
Special Use Land	ds: N/A					
Jointly Managed	Lands: N/A					
Other Considerat						
Proje	ct Components	Meridian, Township	, Range, And S	Section(s)	G	PS Coordinates
N/A	•	N/A			N/A	
3. Private Land	S:				-	
Are supplementa	I pages for land status i	ncluded in Appendix C?			] Yes	⊠ No
Oil And Gas Mine	eral Estate Owner:	I/A				
Surface Ownersh	hip And Access Agreem	ent(s): N/A				
Special Use Land	ds: N/A					
Jointly Managed	Lands: N/A					
Other Considerat	ions: N/A					
Proje	ct Components	Meridian, Township	, Range, And S	Section(s)	G	PS Coordinates
N/A		N/A			N/A	
N/A		N/A			N/A	
N/A		N/A			N/A	
		SECTION VI: SEQUENCE AND	SCHEDULE OF	OPERATION	S	
Project Milestone #		Project Milestone		Proposed S	Start Date	Proposed End Date
1.	Addition of gravel			4/15/2	018	12/31/2022
2.	N/A			N//	A	N/A

4.         N/A         N/A           5.         N/A         N/A           6.         N/A         N/A	N/A N/A
5.         N/A         N/A           6.         N/A         N/A	N/A
6. N/A N/A I	
	N/A
7. N/A N/A	N/A
	N/A
8. N/A N/A I	N/A
9. N/A N/A I	N/A
SECTION VII: PROJECTED USE REQUIREMENTS	
1. Describe the proposed operations, including the location and design, of Well Sites:	
N/A	
2. Describe the proposed operations, including the location and design, of <b>Buildings</b> :	
N/A	
3. Describe the proposed operations, including the location and design, of Fuel and Hazardous Substances:	
N/A	
4. Describe the proposed operations, including the location and design, of Solid Waste Sites:	
N/A	
5. Describe the proposed operations, including the location and design, of Water Supplies:	
N/A	
6. Describe the proposed operations, including the location and design, of Utilities:	
N/A	
7. Describe the proposed operations, including the location and design, of Material Sites:	
N/A	
8. Describe the proposed operations, including the location and design, of <b>Roads</b> :	
This project would increase the thickness of selected road sections to approximately 6.5 feet above the ground surface, and increase the width to the road surface. Thicker roads would have a wider and more stable surface that requires less maintenance, allows more efficient drilling rig move	
provides safer driving conditions. Please see the attachments for additional details.	
9. Describe the proposed operations, including the location and design, of <b>Airstrips</b> :	
9. Describe the proposed operations, including the location and design, of <b>Airstrips</b> :	
9. Describe the proposed operations, including the location and design, of Airstrips: N/A	
9. Describe the proposed operations, including the location and design, of Airstrips:     N/A     10. Describe the proposed operations, including the location and design, of All Other Facilities and Equipment:	
9. Describe the proposed operations, including the location and design, of Airstrips:     N/A     10. Describe the proposed operations, including the location and design, of All Other Facilities and Equipment:     N/A	
9. Describe the proposed operations, including the location and design, of Airstrips:         N/A         10. Describe the proposed operations, including the location and design, of All Other Facilities and Equipment:         N/A         11. If another permit(s) is required for the above described Projected Use Requirements, provide the following information:         Agency       Permit Type         Permit Number       Application Status         Projecte         Requirement	
9. Describe the proposed operations, including the location and design, of Airstrips:         N/A         10. Describe the proposed operations, including the location and design, of All Other Facilities and Equipment:         N/A         11. If another permit(s) is required for the above described Projected Use Requirements, provide the following information:         Agency       Permit Type         Permit Number       Application Status         North Slope Borough       Conditional Development Permit	
9. Describe the proposed operations, including the location and design, of Airstrips:         N/A         10. Describe the proposed operations, including the location and design, of All Other Facilities and Equipment:         N/A         11. If another permit(s) is required for the above described Projected Use Requirements, provide the following information:         Agency       Permit Type         Permit Number       Application Status         North Slope Borough       Conditional Development Permit         TBD       Draft       8         North Slope Borough       TLUI       N/A	
9. Describe the proposed operations, including the location and design, of Airstrips:         N/A         10. Describe the proposed operations, including the location and design, of All Other Facilities and Equipment:         N/A         11. If another permit(s) is required for the above described Projected Use Requirements, provide the following information:         Agency       Permit Type         Permit Number       Application Status         North Slope Borough       Conditional Development Permit         TBD       Draft       8         North Slope Borough       TLUI       N/A         ADF&G       Fish Habitat Permit       TBD       Submitted       8	

ADNR	SHPO Concurrence	N/A	Approved	8	
Various	Letters of Non-Objection	N/A	Draft	8	
	SE	CTION VIII: REHABILITATION	I PLAN		
1. Proposed Level of	of Infrastructure, Facilities and Equi	pment Removal:			
N/A					
2. Description of Re	estoration and Rehabilitation Activiti	es for Vegetation, Habitat, Impa	acted Wildlife, and Other A	pplicable Resources:	
The amended applic	cation does not change the rehabilit	ation plans outlined in the origir	nal authorization. Upon aba	andonment.	
	SECTION IX: OPERATING F	PROCEDURES DESIGNED TO	MINIMIZE ADVERSE EF	FECTS	
Describe operating adjacent areas inclu	procedures designed to prevent or ding:	minimize adverse effects on of	ther natural resources and	I other uses of the Unit area and	
Fish and Wildlife Ha	bitats: CPAI has a Wildlife Avoidar	nce Interaction Plan designed to pre	event or minimize adverse eff	ects on other natural resources.	
Historic and Archeol		ve this would have any impacts to and cultural clearance. No impacts a		rea has been previously cleared	
Public Use Areas:	This area is not open to the public.				
Other Uses: N/A					
	S	ECTION X: GLOSSARY OF TE	ERMS		
Term #	Term		Term Definition		
1. N	I/A Not A	Applicable			
2. T	BD To B	e Determined			
3. C	CPAI Conc	coPhillips Alaska, Inc.			
4. D	Drill S	Site			
5. T	LUI Tradi	tional Land Use Inventory			
6. S	6. SHPO State Historic Preservation Office				
		SECTION XI: CONFIDENTIAL	ITY		
The undersigned he APPLICANT CONT	reby requests that each page/section ACT:	on of this application <u>marked</u> co	nfidential be held confiden	tial under AS 38.05.035(a)(8).	
Signature	Name		Title	Date	

APPENDIX A: MAPS

See attached.

Not Applicable

APPENDIX C: OTHER

Not Applicable

	LAND STATUS: SUPPLEMENTAL SECTION	
1. State Mineral Estate:		
Affected ADL: 025570	Date Effective: 2/1/1965	Date Assigned: Enter Date.
Oil And Gas Lessee(s): CPAI		
Surface Ownership: State of Ala	ska	
Do you have, or anticipate having	an Access Agreement: ⊠ Yes	] No
Special Use Lands: Click here to	o enter text.	
Jointly Managed Lands: Click h	nere to enter text.	
Other Considerations: Click here	e to enter text.	
Project Components	Meridian, Township, Range, And Section(s)	GPS Coordinates
Add gravel to increase width and height of existing roadway	Umiat, T11N, R08E, Sections 23, 24	N/A Linear
Click here to enter text.	Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.
Affected ADL: 025587	Date Effective: 2/1/1965	Date Assigned: Enter Date.
Oil And Gas Lessee(s): CPAI		
Surface Ownership: State of Ala	ska	
Do you have, or anticipate having	an Access Agreement: 🛛 🛛 Yes	🗆 No
Special Use Lands: Click here to	o enter text.	
lainth. Manageral Landa — Olisis is		
Jointly Managed Lands: Click he	ere to enter text.	
5 0	ere to enter text.	
, ,		GPS Coordinates
Other Considerations: Click here	e to enter text.	GPS Coordinates
Other Considerations: Click here Project Components Add gravel to increase width and	e to enter text. Meridian, Township, Range, And Section(s)	
Other Considerations: Click here Project Components Add gravel to increase width and height of existing roadway	Meridian, Township, Range, And Section(s)         Umiat, T11N, R08E, Sections 26	N/A Linear         Click here to enter text.         Click here to enter text.
Other Considerations:       Click here         Project Components         Add gravel to increase width and height of existing roadway         Click here to enter text.	e to enter text.  Meridian, Township, Range, And Section(s) Umiat, T11N, R08E, Sections 26 Click here to enter text.	N/A Linear Click here to enter text.
Other Considerations:       Click here         Project Components         Add gravel to increase width and height of existing roadway         Click here to enter text.         Click here to enter text.         Affected ADL:       Enter ADL.	Meridian, Township, Range, And Section(s)         Umiat, T11N, R08E, Sections 26         Click here to enter text.         Click here to enter text.	N/A Linear         Click here to enter text.         Click here to enter text.
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Surface Ownership: Click here to	enter text	
Do you have, or anticipate having ar		0
Special Use Lands: Click here to e	-	0
•	e to enter text.	
Other Considerations: Click here to		
		GPS Coordinates
Click here to enter text.	Meridian, Township, Range, And Section(s) Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.
Affected ADL: Enter ADL.		ate Assigned: Enter Date.
	to enter text.	Later Date.
Surface Ownership: Click here to e		
Do you have, or anticipate having ar		∃ No
Special Use Lands: Click here to	-	
•	e to enter text.	
5 6		
		GPS Coordinates
Project Components Click here to enter text.	Meridian, Township, Range, And Section(s)	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.
2. State of Alaska Surface Lands:		
Oil And Gas Mineral Estate Owner:	Click here to enter text.	
Access Authorization(s): Click here	e to enter text.	
Access Authorization(s): Click here Special Use Lands: Click here to e	e to enter text. enter text.	
Access Authorization(s): Click here Special Use Lands: Click here to e Jointly Managed Lands: Click her	e to enter text. enter text. e to enter text.	
Access Authorization(s): Click here Special Use Lands: Click here to e Jointly Managed Lands: Click her Other Considerations: Click here to	e to enter text. enter text. e to enter text. o enter text.	
Access Authorization(s): Click here Special Use Lands: Click here to e Jointly Managed Lands: Click here to Other Considerations: Click here to Project Components	e to enter text. enter text. e to enter text. o enter text. Meridian, Township, Range, And Section(s)	GPS Coordinates
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