STATE OF ALASKA DEPARTMENT OF NATURAL RESOURCES State Pipeline Coordinator's Section

Northern Region 3700 Airport Way Fairbanks, AK 99709 (907) 451-2740	Southcentral Region 550 W 7th Ave., Suite 900 Anchorage, AK 99501-3577 (907) 269-8560	Southeast Region P.O. Box 111020 400 Willoughby, #400 Juneau, AK 99801-1021 (907) 465-3400
	ATERIAL SALE APPLICATION 38.05.550-565; AS 38.05.810(a)	
Receipt Types: 17 – Application for	sale of material, except sale of peat from other than a designat	ed material site or source
Non-refundable filing fee: See current Di	rector's Fee Order for applicable fees.	
Applicant's Name TAPS Owners	Doing business as: ^A	Alyeska Pipeline Service Co.
Mailing Address P.O. Box 196660	-	ess: Peter.Nagel@alyeska-pipe
City/State/Zip Anchorage, AK 99519	E man addit	E-Mail:
	ork Phone (907) 787-8170 Fax	()
Location of material site Designated material Site ADL#		
Address	City	State Zip
Are there any improvements on the applica	·	e; state their approximate value and
the name and address of the last known ow TAPS Access Road 130 APL/AMS-5	ner:	
Name	Message Ph	one Work Phone
APSC, Agent Address	City	State Zip
	·	·
Describe the proposed method of excavation	on, including the type of equipment to be u	sed: See attached Mining and Reclamation Plan

102-143 (Rev. 6/18) Page 1

How many cubic yards do you propose to remove	ve per month? N/A	per year'	N/A	
Describe the type of material, (e.g., coarse, un-	-sized angular rocks; v	well-sorted and sized	gravel; sand ar	nd gravel mixed
with some shale; class of rip rap; ballast) River	_		,	3
If permits are required by other agencies, have	they been applied for	? ■ Yes □ No.		
Nagel, Peter C. Digitally signed by Nagel Date: 2020.05.08 10:43:0		N	May 8, 2020	
Applicant's Signature		Ē	ate	
NOTICE: If the proposed material sale is intended to authorizing you to do business in the State of Alaska. sufficiently detailed to enable the Division of Mining, Laconsiders it necessary, the applicant may be required to To your knowledge, is the general shoreline in the AS 38.05.035(a) authorizes the director to decide what informinformation is made a part of the state public land records qualifies for confidentiality under AS 38.05.035(a)(8) and conyou or any member of the public. A person who is the subject written description of the challenged information, the changestatements made in an application for a benefit are punishable "electronic" means to conduct "transactions" (as those terms at this form and that the Department need not retain the original destroy the original. ADDITIONAL INFORMATION TO	This application will not be and and Water to locate the submit a more detailed matche vicinity of the proper mation is needed to process and becomes public inform fidentiality is requested, AS at of the information may chall ges needed to correct it, and le under AS 11.56.210. In su care used in the Uniform Elect all paper form of this record:	e considered complete use application site. If the up or survey plat. Dosed site undergoing an application for the sale nation under AS 40.25.110 13.05.230, or AS 45.48). Purenge its accuracy or complete a name and address with a mitting this form, the appronic Transactions Act, AS the department may retain the sale of the sale	erosion or eruse of state land and 40.25.120 (urublic information is deteness under AS 4 here the person calicant agrees with the 109.80.010 – AS 09. this record as an example of the control of the con	accretion? accretion? and resources. This less the information open to inspection by 4.99.310, by giving an be reached. False the Department to use 80.195) that relate the electronic record and the base of the
Is the applicant the upland owner? Yes Name	No. II not, state the na	Message Phone	Work Phone	er or owners:
Address		City	State	Zip
State the name and address of the adjacent upl	and owners:	- ,		•
ctate and marile and address of the adjacent ap-	and owners.			
Name		Message Phone	Work Phone	
Address		City	State	Zip
Is the application site seaward of any lands national forest purposes, or by the state for sta No. If yes, state the use of the land and the nar	ate or local governme			
State the distance to the nearest occupied tidela	ands	and the name an	d address of the	e occupant:
Name		Message Phone	Work Phone	
Address		City	State	Zip
Have you applied for a U.S. Army Corps of Eng	ineers (COE) permit?			•
a. a you applied for a o.o. / tillly oorpo of Elig	,5515 (55E) pormit:			

Trans Alaska Pipeline System Gravel Mining in Active Floodplain, Sagavanirktok River

Alyeska Pipeline Service Company, Permit Narrative (May, 2020)

Purpose

River flooding over the past five years resulted erosion that threatened the integrity of the TAPS mainline pipe along the segment between Pipeline Mileposts (MP) 18 and 85. Most of this pipeline segment is buried in the thaw-stable soils along the periphery of the Sagavanirktok floodplain between the river and highway. To prepare for planned and contingent gravel use in anticipation of continued flooding, Alyeska proposes selective gravel mining from a location on the active floodplain approximately three miles south of the Franklin Bluffs Pad which is at Dalton Highway Milepost (DHMP) 377.

Site Description

The project site is located off the end of TAPS Access Road 130 APL/AMS-5 near Pipeline MP 42, seventeen miles north of Pump Station 2 and downstream of the Ivishak River confluence. In this area the Dalton Highway and the pipeline follow the west side of the Sagavanirktok River floodplain which is over two miles wide.

The gravel bar is located on a braided but stable reach of the river with multiple islands, midchannel and point bars. The bar is approximately one mile long and a third of a mile wide, depending on water levels. Surface of the point bar is almost exclusively bare mineral soils such as gravels and sands with little or no vegetation. Soils adjacent to the river in this area consist of erosive fine sands overlying thaw stable gravel which is covered by Arctic tundra consisting of sedges, grasses, mosses, and dwarf shrub communities.

The river is classified as an anadromous fish stream, and its side channels are also considered anadromous because of their connection to the main channel. Fish species are the Arctic Char, Arctic Grayling, Burbot and White Fish.

Problem Description

In May of 2019, high water breached several TAPS flood control structures and exposed the pipeline at MP 28. Significant support from state, local and federal regulatory agencies permitted Alyeska to restore the pipeline cover and bolster the control structures. The response included shallow mining of an unvegetated gravel bar in the vicinity. Continued flooding is anticipated both downstream and upstream of the Ivishak confluence because the river's annual discharge has been increasing, with precipitation on the North Slope up about 8% (Alaska Climate Research Center).

In continued response to the 2019 events in this area, Alyeska is doubling its annual large rock (riprap) production in 2020 and targeting deployment of 200,000 cubic yards of gravel either to flood-control structures between MP 22 and 47 or to contingency stockpiles. Implementing this plan will require commitment of significant resources by the company.

Gravel deposits along the northern third of the Dalton Highway are limited geographically. The known deposits which can be developed without compromising pipeline integrity are either near Deadhorse north of the TAPS frontage in the floodplain or south of it near Slope Mountain.

Using these material sources would significantly increases transportation cost and hazards due to excessive haul distances. Also, the Alaska Department of Transportation and Public Facilities highway work on the northern sixty miles of the highway would increase further the costs of hauling from these "remote" pits. The State has issued a contract for paving of the northernmost twenty-two miles of the highway in 2020 and will contract next year for paving south from there to DHMP 360. At this time, there is no viable, regional material source to support the needed TAPS protection.

Work Description

100,000 cubic yards of material is proposed to be mined from the unvegetated gravel bar at PLMP 42 (DHMP 374) for deployment in 2020 to TAPS work sites or to stockpile on the existing gravel pad adjacent to the pipeline right-of-way near the old Franklin Bluffs Pad. Another 50,000 cubic yards would be mined from the currently permitted site, ADL 421216, at PLMP 25 (DHMP 392) and combined for deployment with the 50,000 CY currently stockpiled nearby.

As in 2019, mining would be performed during low water conditions using an excavator and bulldozer to excavate the top of the bars above the water line. Setbacks, isolation berms and restoration details for protecting water quality and fish populations are covered in the attached draft mining plan. If environmental and resource factors delay completion of the production past Freeze-up, mining would be continued into the winter season and 2021.

Hauling and stockpiling the material would be primarily by articulating 40-ton rock trucks along the pipeline workpad, bolstered as needed by highway transportation routes.

Alternatives Analysis (see attached Gravel Source Area Map)

There is an abundance of cited literature on the adverse effects of river mining (Smith, 2014). The studies generally cover large industrial scale mining done continuously year after year. The sites were often mined on the same reach of the river with cumulative extractions in the tens of millions of cubic yards resulting in sediment depletion in the riverine system and other adverse environmental effects (Kondolf, 1997).

Proposed Alternative

The proposed alternative would mine gravel at a sustainable scale from certain river bars where mining and removal can be conducted in a manner that minimizes or avoids adverse impacts to the physical, biological and socio-economic/safety environments.

Criteria for mining at gravel bars include;

- o Stability of the river reach, taking into account susceptibility to bank erosion, channel migration and avulsion, floodplain degradation/aggradation and changes to channel morphology
- o Sparse vegetation or completely bare gravel bars
- \circ Extracting only from the top of the bar above water level, typically 1-3 feet
- o Intermittent mining only of very low-volume extractions (under 150,000 CY).
- o All-season road access
- o Central location within the area where the pipeline is routed along the river floodplain.

Meeting these criteria, results in;

- o Minimal adverse effect on the floodplain environment, such as vegetation and fish habitat, and avoidance of wetlands. (Woodward-Clyde, 1980).
- o Preservation of the gravel bar substrate and minimal impacts to the river system including channel morphology and sediment transport. (Church, 2006)
- Natural recharge of the gravel bar over two to four years. A multi-year hydro-sedimentological study on the Sagavanirktok River near the proposed gravel bar was conducted from 2015 to 2019. The research results show that infilling on two excavated rectangular trenches to original conditions was achieved between two to four years (Toniolo et al, 2019). This field study enabled the development of sediment transport equations and a first-order estimate on sediment transport rates for the Sagavanirktok River (Toniolo, 2020).
- o Reduced conflict with highway construction schedules and safety plans from thousands of truck trips
- o Reduced costs from expanded construction season, use of existing TAPS infrastructure and central location within the flood-control work area.

The proposed alternative, comprising limited extraction in a large, braided river system, is consistent with the conclusions of scientific research on gravel extraction in active floodplains. (NOAA/NMFS, 2004 and 2005; Joint State/Federal Fish and Wildlife Advisory Team, 1977)

Deep Pit Sites in the Active Floodplain:

Deep pit gravel extraction on the active floodplain such as at point bars have been used in the past throughout North America on large gravel mining operations. This type of mining is more likely to have adverse hydrological and environmental effects. When done on a gravel bar for example, it can alter the point bar morphology and also trap fish. Deep pits can offer temporary overwintering habitat for fish on the Sagavanirktok. The deep excavations, however, can also lead to headcuts resulting in channel avulsions or change in flow patterns on the active floodplain that can threaten the river banks, habitat, and integrity of infrastructure in the vicinity (Collins and 1990). Therefore, for the small volume of gravel extraction proposed and increased environmental/infrastructure risk, this method is not desirable.

Sites in the Land Buffer between the River and the Highway:

Developing existing or new sites which are located on either side of the pipeline in the land buffer between the river and the highway would increase unacceptably the exposure of the pipeline to erosion by highwater and flood events. The Sagavanirktok ("river which is swift") has eroded as much as 200 feet of buffer next to TAPS in a single flood event.

An example of a land buffer site between the river and the pipeline is the deep pit developed and expanded for highway improvements at DHMP 381 (M.S. 65-9-024-2, PLMP 36). Recent high flows resulted in increased bank erosion towards the gravel pit. When the river connects with the gravel pit, the buffer between the pipe and river will immediately decrease from 1500 to 800 feet. The resulting, sudden change in the river bank configuration would create instability in the river reach and very possibly contribute to more vigorous and accelerated erosion.

An example of a land buffer site between the pipeline and the highway is the deep pit developed for highway improvements at DHMP 342 (M.S. 65-9-071-2, PLMP 73. Flood overflows

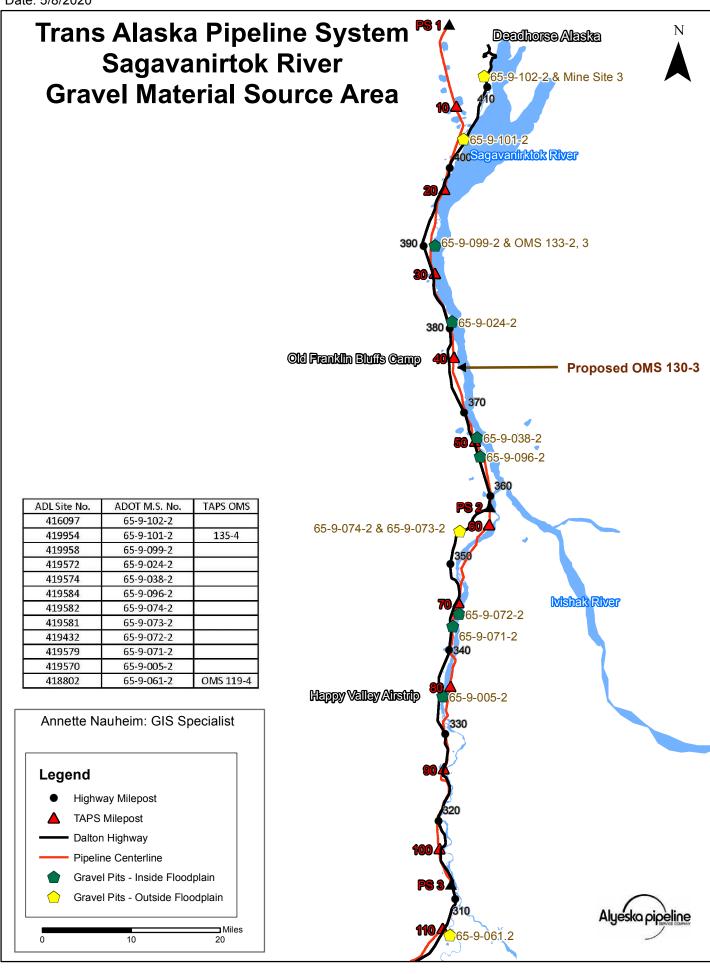
inundate the terrain on both sides of the buried pipeline and plunge into the causing "headcutting" erosion and scour of the tundra from the pit towards the Pipeline. These headcuts can result in deep channels emanating from the pit towards the river, crossing the pipeline and reducing or completely removing the cover over the pipeline.

Sites West of the Highway, outside of the Flood Zone:

Existing borehole log data confirms the absence of material sources on the west side of the highway away from the river in this area. The nearest sources of good quality material are at DHMP 412, 404, and 306. Although there are two partly-developed sites at DHMP 354 (M.S. 65-9-074 & -073-2), the material is of poor quality, consisting mostly of sandstone and shale bedrock with some conglomerates. This material breaks down to form a silty sand and pebble conglomerate. It's too fine grained and frost susceptible for building dikes, roads, and other earth structures.

The table below encompasses the alternative sites discussed above and shown on the attached map.

ADNR ADL No.	ADOTPF M.S. No.	DHMP	Comments
416097	65-9-102-2	412	Remote (38 miles to Subject)
419954	65-9-101-2	404	Remote (30 miles to Subject)
421216		392	In active floodplain, Proposed to continue at site A
419958	65-9-099-2	390	In Land Buffer adjacent to Pipeline
419572	65-9-024-2	381	In Land Buffer adjacent to PL
Subject		374	In active floodplain; Proposed OMS 130-3
419574	65-9-038-2	367	In Land Buffer adjacent to PL
419584	65-9-096-2	365	In Land Buffer adjacent to PL
419582	65-9-074-2	354	Poor quality material
419581	65-9-073-2	354	Poor quality material
419432	65-9-072-2	344	In active floodplain
419579	65-9-071-2	342	In Land Buffer adjacent to PL
419570	65-9-005-2	334	In active floodplain
418802	65-9-061-2	306	Remote (68 miles to Subject)



Environmental Impacts and Mitigation

The project will avoid adverse impacts to water flow, floodplain and existing vegetation in riparian areas. Heavy equipment use will be confined to the existing TAPS workpad and spur dikes and unvegetated gravel bars. All fueling will be done on the R.O.W. outside the active floodplain.

Water quality will be impacted only nominally because the mining will not be conducted in flowing water and will not extend into the water table. Access to the mining sites, will be routed as much as practical to avoid any small isolated waters or very minor braids, and best management practices such as silt fencing, tundra mats and/or temporarily filling or rock-lining the crossings if avoidance is not practical. Gravel ramps will be installed if needed for equipment access from the end of the existing access roads and then removed after mining is completed. The piling of gravel on the gravel bar/s for loading the hauling equipment will be of short-term duration only.

There will be minimal impact to aquatic life because the gravel extraction will not be in active channels. Any fish encountered in pools subject to repair and access will be captured and released in the waterways nearby. Alyeska's operations in this area are covered by the company's Polar Bear Interaction Plan and a Letter of Authorization for Unintentional Take from the US Fish and Wildlife Service.

The gravel mining will not occur in wetlands. The proposed source bar have been subjected to disturbances from recent floods and icing events and supports only sparse vegetation, if any. Therefore, impact to local flora will be minimal. No additional mitigation is planned.

Construction Order of Work and Schedule

- 1. Mobilize equipment and personnel
- 2. Establish access to the site, such as gravel ramps
- 3. Install outer perimeter gravel berms to prevent fish entrapment
- 4. Scrape/mine gravel bar
- 5. Load and haul gravel offsite
- 6. When mining is complete remove gravel berms
- 7. Grade site and contour to avoid fish entrapment
- 8. Clean up and demobilize

References

Collins, Brian; Dunne, Thomas, Fluvial geomorphology and river-gravel mining: a guide for planners, case studies included, ; California. Division of Mines and Geology 1990.

Church, Michael, River Processes: How Do Rivers Provide Gravel? in Regional Symposium on In-stream Gravel Extraction and its Effects on Fish Habitats, (2006).

Joint State/Federal Fish and Wildlife Advisory Team (JFWAT) Environmental Surveillance of Gravel Removal on the Trans-Alaska Pipeline System with Recommendations for Future Gravel Mining (Burger and Swenson, 1977)

Kondolf, Mathias G. Hungry Water: Effects of Dams and Gravel Mining on River Channels.

- Environmental Management Vol. 21, No. 4, (1997).
- National Marine Fisheries Service (NMFS) National Gravel Extraction Guidance: A review of the effects of in- and near-stream gravel extraction on anadromous fishes and their habitats, with recommendations for avoidance, minimization, and mitigation (2005)
- National Oceanic and Atmospheric Administration (NOAA) Sediment Removal From Freshwater Salmonid Habitat: Guidelines to NOAA Fisheries Staff for the Evaluation of Sediment Removal Actions from California Streams (2004).
- Toniolo, Horacio. (2020). Bed-Sediment Transport Conditions Along the Sagavanirktok River in Northern Alaska, USA. Water. 12. 774. 10.3390/w12030774.
- Toniolo, Horacio et al., Hydrological, Sedimentological, and Metereological Observations and Analysis of the Sagavanirktok River: 2019 Final Report. University of Alaska Fairbanks, WERC, Report INE/WERC 20.01, Fairbanks, AK
- Smith, Julie, Sagavanirktok River Gravel Extraction Resources and Land Management Considerations. Alaska Department of Natural Resources (July 2014)
- Woodward-Clyde Consultants. Gravel Removal Studies in Arctic and Subarctic Floodplains in Alaska. U.S. Fish and Wildlife Service. (1980)



MINING

AND

RECLAMATION PLAN

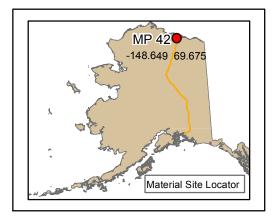
OPERATIONS MATERIAL SITE 130-3

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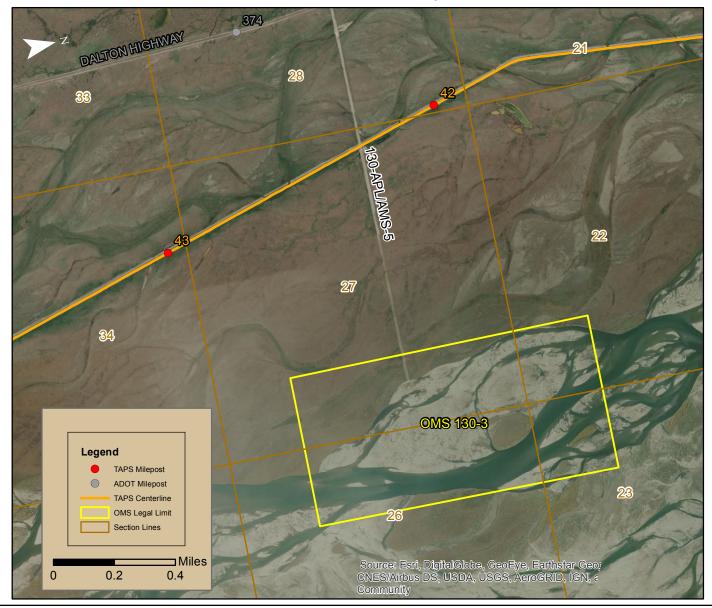


Legal Description of Material Site Tract: T4N, R14E. U.M, SEC 22: SE1/4 SE1/4, SEC 23: SW1/4 SW1/4, SEC 27: E1/2 NE1/4, NE1/4 SE1/4 & SEC 26: W1/2 NW1/4, NW1/4 SW1/4 OMS Legal Limits: Approximately 320 acres

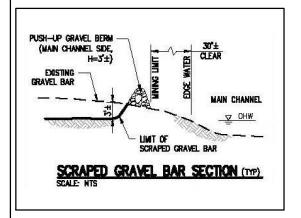
> Property Owner: State of Alaska U.S.G.S Sagavanirktok (C-3) North Slope Borough, Alaska



Proposed OPERATIONS MATERIAL SITE 130-3 Sagavanirtok River Location and Vicinity Map



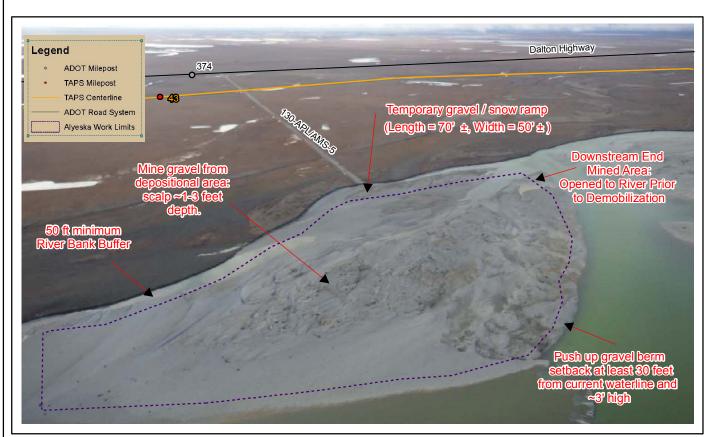
Date: 4/6/2020 PAGE 3



Legal Description of Material Site Tract:
T4N, R14E. U.M,
SEC 22: SE1/4 SE1/4, SEC 23: SW1/4 SW1/4,
SEC 27: E1/2 NE1/4, NE1/4 SE1/4 &
SEC 26: W1/2 NW1/4, NW1/4 SW1/4
Alyeska Work Limits: Approximately 129 acres

Property Owner: State of Alaska
U.S.G.S Sagavanirktok (C-3)
North Slope Borough, Alaska

Proposed OPERATIONS MATERIAL SITE 130-3 Sagavanirktok River Material Site Photo



Annette Nauheim: GIS Specialist

Photo is not geo-referenced or ortho-rectified.

Date of Photo: September 2019

ALYESKA PIPELINE SERVICE COMPANY

MINING AND RECLAMATION PLAN

OPERATIONS MATERIAL SITE 130-3

LAST REVISION DATE: April 6, 2020

I. LOCATION AND ACCESS

Pipeline Milepost: 42

Highway Milepost: Dalton Highway MP 374

Access Road: 130-APL/AMS-5

Latitude/Longitude: N 69° 40' 29.994" / W 148° 38' 56.4"

-148.649, 69.675 Decimal Degrees

Comments: Unvegetated gravel bar/s in floodplain of the

Sagavanirktok River

II. SITE DESCRIPTION

Pit Users: Alyeska

Past Mining Use: Workpad and access road construction

Future Material Use: Workpad, road, and erosion control structure repair and

upgrade

Landform: Braided river floodplain gravel bars

Material Type: Alluvial gravel with cobbles

Work Area: Approximately 129 acres. Alyeska work limits have not

been surveyed.

Estimated Yield: 396,000 cu yds

Volume Extracted: N/A

Select Material: Screening operations will not be required
Groundwater Depth: Varies with the level of the Sagavanirktok River

Permafrost: None. Seasonal freeze and thaw.

III. MINING REQUIREMENTS

A. Excavation Methods

Equipment: Equipment to be used includes, but is not limited to,

graders, dozers, excavators and light plants.

Blasting: No

Working Depth: Approximately three feet from surface, or depth of water

table whichever is less. Material shall be removed in

shallow even lifts.

Side Slopes: N/A

Processing and Stockpiling: None. Temporary floodplain stockpiling shall not exceed

5 days subsequent to the completion of active mining

operations.

Work Limits Subdivision: Site will be developed as material quantities dictate.

B. Clearing, Waste and Overburden Material

Previous Clearing: None Merchantable Timber: None None Clearing Required: Clearing Debris: None Burning: None Waste Stockpile: None Overburden Depth: None Overburden Stockpile: None

Petroleum Wastes: No petroleum wastes will be disposed of at this site.

C. Site Hydrology

Buffer Zone: No active mining within 30 ft of any active channel.

Drainage: N/A; Permeable gravels.

Water Quality Impact: None anticipated. No de-watering needed because the

depth will not exceed the top of water table; Also, 30' buffer zone and temporary berms between the mining area and river edge. Other BMP's as needed include temporary culvert/low water crossing, silt fence, and

waddles.

Hydraulic Analysis: Mining in the Sagavanirktok River floodplain as

proposed will not have an effect on the river regime. Maintain even smooth lifts. This shallow-scrap technique will not increase channelization or channel migration because it alters the floodplain profile only

negligibly.

IV. SPECIAL CONSIDERATIONS

A. Impact on Non-Mineral Resources

1. Aesthetics

Visible from Highway:

Will appear as an exposed, unvegetated gravel bar.

Impact: None

2. Antiquities and Historical Sites

Known Resources: None

If Found: Stop mining, notify APSC Land/Legal

3. Big Game Movements and Wildlife Protection

Wildlife Concerns: Polar Bears, Caribou and Musk Ox may pass through Comments: Follow best management practices in the Polar Bear

Follow best management practices in the Polar Bear Interaction Plan. Assure free passage and avoid harassment. Future wildlife utilization will not be

ieopardized.

4. Fisheries Protection

Fish Stream/Lake: Sagavanirktok River supports anadromous fish

Impact to Fish: None.

Comments: Buffer strips along moving water boundaries maintained

to avoid siltation. Material shall be removed in a manner to prevent fish entrapment. A temporary ramp will be constructed per the Site Photo. Temporary low-water crossing/s or culvert/s will be installed if needed for equipment to cross minor connected waterways of

the river.

5. Land and Water Quality:

There will be no hazardous substances stored in the mining area overnight. Equipment will be taken to the access road or RPW offsite of the river pits for fueling and servicing. BMP's will include but not be limited to the use of 110% containment for all stationary units, e.g.

unattended equipment, light plants.

B. Special Authorizations

	Stipulation	<u>Applies</u>
1.	2.2.2.2	Mobile ground equipment may operate briefly in the Sagavanirktok River.
2.	2.3.3.1	Alyeska work limits for this site encroach within 300 ft of the Sagavanirktok River.
3.	2.4.4.1	Disturbed areas will not be reseeded.
4.	2.6.1.3	Gravel to be removed from the river bed (floodplain) of the Sagavanirktok River.
5.	2.8.1	Mining in the Sagavanirktok River, as proposed, will not have an effect on the river regime.

C. Anticipated Third Party Effects

Known Effects: None.

V. RECLAMATION

Cut Slope Grading: N/A

Grading and Stabilization: The perimeter berms_and ramp will be removed at the

end of each mining season. The site will be re-graded to

the best of our ability to prevent ponding. The

downstream end of the mined area will be daylighted to the river edge. All stockpiles, equipment and any artificial materials such as culverts, silt fence or waddles, will be removed before each seasonal demobilization is

complete.

Annual Reclamation Statement: Filed as directed by the Alaska Department of Natural

Resources (Statute 27.19) upon request for a release

from bond

VI. JURISDICTION

Legal Description:

OMS 133-2.3 <u>T. 4N., R 14E. U.M.</u> Sec. 22, 26 & 27

Barrow Recording District

The land within the outer land use limits of this site is under the jurisdiction of the State of Alaska, Department of Natural Resources, by virtue of Patent No. 50-74-0096 (F-10325) dated March 27, 1974. Within the land use area of the site there appear the following encumbrances:

AS 19.40.010, restricting certain activities within the Dalton corridor.

ADL 50666, Special Use Land designation requiring permits for certain activities.

Mineral Order 1147, as to Section 27

ADL 63574, a Pipeline Right-of-Way for the Trans Alaska Pipeline System.

ADL 414571, a Road Right-of-Way issued to Alyeska Pipeline Service Company.

<u>LAS 20644</u>, an Instream Water Flow Reservation issued to the Alaska Department of Fish and Game.

The land is within the corporate boundaries of the North Slope Borough.