

NORTH SLOPE	Company Response
A. Mitigation Measures	
1. Facilities and Operations	
a. Oil and gas facilities, including pipelines, shall be designed using industry-accepted engineering codes and standards. Technical submittals to the Division of Oil and Gas (DO&G) that reflect the "practice of engineering," as defined by AS 08.48.341, must be sealed by a professional engineer registered in the State of Alaska.	N/A
b. A plan of operations shall be submitted and approved before conducting exploration, development, or production activities in accordance with 11 AAC 83.	Mitigation Measure is met. A lease plan of operations is being submitted to ADNDR for the Alkaid #2 and Alkaid #3 wells by Great Bear Pantheon LLC ("Great Bear").
c. Facilities shall be designed and operated to minimize sight and sound impacts in areas of high residential, recreational, and subsistence use and important wildlife habitat.	Mitigation Measure is met. There are no Native allotments or residential areas in the proposed project area. There is no recreational use in the proposed project area. Based on input from the NSB and villages, Great Bear does not believe that the proposed project area is characterized as an area of high use for subsistence activities. Access to the roads and pads will be restricted to the general public, but current access to the area will not be impacted.
d. The siting of facilities, including roads, airstrips, and pipelines, is prohibited within one-half mile of the coast as measured from the mean high water mark and 500 feet of all fish bearing waterbodies.	Mitigation Measure is met. Both the Alkaid #2 and Alkaid #3 gravel pads and the driveways will all be more than ½ mile from the coast and more than 500 feet from any fish-bearing stream.
e. Notwithstanding (d) above, the siting of facilities is prohibited within one-half mile of the banks of the Colville, Canning, Sagavanirktok, Kavik, Shaviovik, Kadleroshilik,	Mitigation Measure is met. Both the Alkaid #2 and Alkaid #3 gravel drill pads and the Alkaid #3 driveway are located outside the ½ mile

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Echooka, Ivishak, Kuparuk, Toolik, Anaktuvuk and Chandler Rivers as measured from the ordinary high water mark. Facilities may be sited, on a case-by-case basis, within the one-half mile buffer if the lessee demonstrates that siting of such facilities outside this buffer zone is not feasible or prudent, or that a location within the buffer is environmentally preferable.	buffer from the Sag River. The Alkaid #2 driveway from the Dalton Highway is within the buffer but is located on the opposite side of the Dalton Highway from the Sag River, and must be within the buffer for the purpose of providing access from the Dalton Highway to the drillsite. The temporary staging area at Alcor is located within the buffer, but is located on the only designated uplands within the project area. Use of the temporary storage pad at Alcor allows Great Bear to shrink the footprint of the Alkaid #2 and Alkaid #3 gravel pads. The use of rig mats to construct the temporary staging pad at Alcor is environmentally preferable to laying more gravel on wetlands at Alkaid #2 and Alkaid #3. We request an exception to this measure solely for the Alkaid #2 gravel driveway and the temporary storage area at Alcor.
f. No facilities will be sited within one-half mile of identified Dolly Varden overwintering and/or spawning areas on the Canning, Shaviovik, and Kavik rivers. Notwithstanding the previous sentence, road and pipeline crossings may only be sited within these buffers if the lessee demonstrates to the satisfaction of the Director and Alaska Department of Fish and Game (ADF&G) in the course of obtaining their respective permits, that either (1) the scientific data indicate the proposed crossing is not within an overwintering or spawning area; or (2) the proposed road or pipeline crossing will have no significant adverse impact to Dolly Varden overwintering or spawning habitat.	N/A. No facilities are proposed in these areas.
g. Impacts to important wetlands shall be minimized to the satisfaction of the Director, in consultation with ADF&G and Alaska Department of Environmental Conservation (ADEC). The Director will consider whether facilities are sited in the least sensitive areas.	Mitigation Measure is met. Care has been taken to locate the drilling pads within the existing transportation corridor, but outside the ½-mile buffer from the Sag River within relatively lower-value wetlands of a ubiquitous nature on the North Slope. Use of the temporary staging pad at Alcor further minimizes impacts to wetlands by using a patch of previously disturbed uplands for storage rather than increasing the footprint of a new gravel pads.

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h. Exploration roads, pads, and airstrips shall be temporary and constructed of ice. Use of gravel roads, pads, and airstrips may be permitted on a case-by-case basis by the Director, in consultation with Division of Mining, Land, and Water (DMLW) and ADF&G.	An exception to this Mitigation Measure is requested. The Alkaid #2 and Alkaid #3 wells will be completed as long-term pilot production tests of a known oil reservoir. The long-term pilot production test is necessary to determine the initial flow rate and decline curve of production within this reservoir to demonstrate the production profile and economic potential prior to investment in a full production spread of equipment. Further, in order to fully test the reservoir's potential, a horizontal multi-stage hydraulic fracture stimulation operation ("frac") is needed. The frac requires significant volumes of water be readily available at the drillsite. Storage of sufficient water on site is both impractical due to size requirements and would be cost prohibitive. Having access to Annie Pit and the Sag River as a ready water source with a large-capacity hose to deliver the water to the Alkaid #2 and Alkaid #3 sites is necessary. Sufficient water from Annie Pit and the Sag River are only available during the spring/summer months. For all these reasons, a solely winter operation and ice pad/ice road supported project will not meet the objectives of the project. Great Bear has made efforts to mitigate the impact of granting an exception to this mitigation measure, and to lessen the possibility that the gravel pad and driveways will need to be removed and rehabilitated if the project is not successful. Each location is sited within the Dalton Highway transportation corridor. In addition, the Alkaid #2 pad is located near a designated potential pipe storage pad within the Alaska Natural Gas Pipeline project description. If an Alkaid development project does not move forward, the State may choose to keep the pads as support for maintenance of the Dalton Highway or as a potential pipe storage pad for the gasline project.
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i. Road and pipeline crossings shall be aligned perpendicular or near perpendicular to watercourses.	N/A. The proposed driveways do not cross any watercourses. There are no pipelines associated with the project.
j. Pipelines i. Shall use existing transportation corridors and be buried where soil and geophysical conditions permit. ii. In areas with above ground placement, pipelines shall be designed, sited, and constructed to allow for the free movement of wildlife and to avoid significant alteration of caribou and other large ungulate movement and migration patterns. iii. At a minimum, above ground pipelines shall be elevated seven feet, as measured from the ground to the bottom of the pipeline, except where the pipeline intersects a road, pad, or a ramp installed to facilitate wildlife passage. A lessee shall consider snow depth in relation to pipe elevation to ensure adequate clearance for wildlife. iv. Pipelines and gravel pads shall facilitate the containment and cleanup of spilled fluids.	N/A. There are no pipelines associated with the project.
k. Causeways and docks shall not be located in river mouths or deltas. Approved causeways shall be designed, sited, and constructed to prevent significant changes to nearshore oceanographic circulation patterns and water quality characteristics (e.g., salinity, temperature, suspended sediments) that result in exceedances of water quality criteria, and must maintain free passage of marine and anadromous fish.	N/A. There are no causeways or docks associated with the project.
l. Artificial gravel islands and bottom founded structures shall not be located in river mouths or active stream channels on river deltas, except as provided for in (m) below.	N/A. There are no artificial islands or bottom founded structures associated with the project.
m. Each proposed structure will be reviewed on a case-by-case basis. Causeways, docks, artificial gravel islands and bottom founded structures may be permitted if the Director, in consultation with ADF&G and ADEC, determines that a causeway or other structures are necessary for field development and that no practicable alternatives exist. A monitoring program may be required to address the objectives of water quality and	N/A. There are no such structures associated with the project.

free passage of fish, and mitigation shall be required where significant deviation from objectives occurs.	
n. Upon abandonment of material sites, drilling sites, roads, buildings or other facilities, such facilities must be removed and the site rehabilitated to the satisfaction of the Director, unless the Director and any non-state surface owner, determines that such removal and rehabilitation is not in the state's interest.	Mitigation Measure is met. See Section IX of the Plan of Operations Application.
o. Material sites required for exploration and development activities shall be: i. restricted to the minimum necessary to develop the field efficiently and with minimal environmental damage, ii. where practicable, designed and constructed to function as water reservoirs for future use, and iii. located outside active floodplains of a watercourse unless the Director DMLW, after consultation with ADF&G, determines that there is no practicable alternative, or that a floodplain site would enhance fish and wildlife habitat after mining operations are completed and the site is closed.	Mitigation Measure is met. No new material site will be required for the Alkaid #2 well project. i. Great Bear will utilize an existing material site and will not require an additional material site for the project; ii. The rehabilitation of the material site will be subject to the specific authorization previously issued by DNR; iii. No new material site will be required.
p. The Director may include plan stipulations if necessary to reduce or eliminate adverse impacts to fish and wildlife or to protect the environment.	N/A
2. Fish and Wildlife Habitat	
a. The lessee shall consult with the North Slope Borough (NSB) before proposing the use of explosives for seismic surveys. The Director may approve the use of explosives for seismic surveys after consultation with the NSB.	N/A.
b. Any water intake structures in fish bearing or non-fish bearing waters shall be designed, operated, and maintained to prevent fish entrapment, entrainment, or injury.	Mitigation Measure is met. Any water intake structures will meet the requirements of ADF&G.

All water withdrawal equipment must be equipped and must use fish screening devices approved by ADF&G.	
c. Removal of snow from fish-bearing rivers, streams, and natural lakes shall be subject to prior written approval by ADF&G. Compaction of snow cover overlying fish-bearing waterbodies is prohibited except for approved crossings. If ice thickness is not sufficient to facilitate a crossing, then ice or snow bridges may be required.	Mitigation Measure is met. No snow removal is anticipated as part of the project.
d. Bears: i. Brown bears A. A lessee must consult with ADF&G before commencing any activities to identify the locations of known brown bear den sites that are occupied in the season of proposed activities. B. Exploration and production activities shall not be conducted within one-half mile of occupied brown bear dens unless alternative mitigation measures are approved by ADF&G. C. A lessee who encounters an occupied brown bear den not previously identified by ADF&G shall report it to the Division of Wildlife Conservation, ADF&G, within 24 hours. The lessee will avoid conducting mobile activities one-half mile from discovered occupied dens unless alternative mitigation measures are approved by the Director, with concurrence from ADF&G. Non-mobile facilities will not be required to relocate. ii. Polar bears A. Consultation with the US Fish and Wildlife Service (USFWS) is required prior to commencement of any activities as required by the Endangered Species Act, and also to identify the locations of known polar bear den sites.	A.2.d. Mitigation Measure is met. See Attachment - Bear Avoidance, Interaction, Mitigation, and Monitoring Plan. A.2.d.i. Mitigation Measure is met. See Attachment - Bear Avoidance, Interaction, Mitigation, and Monitoring Plan. A.2.d.i.A. Mitigation Measure is met. See Attachment - Bear Avoidance, Interaction, Mitigation, and Monitoring Plan. A.2.d.i.B. Mitigation Measure is met. See Attachment - Bear Avoidance, Interaction, Mitigation, and Monitoring Plan. A.2.d.i.C. Mitigation Measure is met. See Attachment - Bear Avoidance, Interaction, Mitigation, and Monitoring Plan. A.2.d.ii N/A. The project is more than 35 miles from the coast and outside the area of known polar bear activity.

B. Operations shall avoid known polar bear dens by at least one mile. C. A lessee who encounters an occupied polar bear den not previously identified by USFWS shall report it to the USFWS within 24 hours and subsequently avoid the new den by at least one mile. D. If a polar bear should den within an existing development, off-site activities shall be restricted to minimize disturbance. iii. For projects in proximity to areas frequented by bears, the lessee is required to prepare and implement a human-bear interaction plan designed to minimize conflicts between bears and humans. The plan shall include measures to: A. minimize attraction of bears to facility sites; B. organize layout of buildings and work areas to minimize interactions between humans and bears; C. warn personnel of bears near or on facilities and the proper actions to take; D. if authorized, deter bears from the drill site; E. provide contingencies in the event bears do not leave the site; F. discuss proper storage and disposal of materials that may be toxic to bears; and G. provide a systematic record of bears on the site and in the immediate area.	A.2.d.iii. Mitigation Measure is met. See Attachment - Bear Avoidance, Interaction, Mitigation, and Monitoring Plan. A.2.d.iii.A. Mitigation Measure is met. See Attachment - Bear Avoidance, Interaction, Mitigation, and Monitoring Plan. A.2.d.iii.B. Mitigation Measure is met. See Attachment - Bear Avoidance, Interaction, Mitigation, and Monitoring Plan. A.2.d.iii.C. Mitigation Measure is met. See Attachment - Bear Avoidance, Interaction, Mitigation, and Monitoring Plan. A.2.d.iii.D. Mitigation Measure is met. See Attachment - Bear Avoidance, Interaction, Mitigation, and Monitoring Plan. A.2.d.iii.E. Mitigation Measure is met. See Attachment - Bear Avoidance, Interaction, Mitigation, and Monitoring Plan. A.2.d.iii.F. Mitigation Measure is met. See Attachment - Bear Avoidance, Interaction, Mitigation, and Monitoring Plan. A.2.d.iii.G. Mitigation Measure is met. See Attachment - Bear Avoidance, Interaction, Mitigation, and Monitoring Plan.
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e. Permanent, staffed facilities shall be sited to the extent practicable outside identified brant, white-fronted goose, snow goose, tundra swan, king eider, common eider, Steller's eider, spectacled eider, and yellow-billed loon nesting and brood rearing areas.	Mitigation Measure is met. There are no permanent, staffed facilities associated with the project. Following drilling and completion operations, the sites will be unmanned and periodically checked by Great Bear. Also, the project is outside identified brant, white-fronted goose, snow goose, tundra swan, king eider, common eider, Steller's eider, spectacled eider, and yellow-billed loon nesting and brood rearing areas.
f. The Director, in consultation with ADF&G, may impose additional and seasonal restrictions on activities located in, or requiring travel through or overflight of, important caribou or other large ungulate calving and wintering areas during the plan of operations approval stage.	N/A
3. Subsistence, Commercial and Sport Harvest Activities	
a. Lease-related use will be restricted if necessary to prevent unreasonable conflicts with subsistence, commercial, or sport fish and wildlife harvest activities. Traditional and customary access to subsistence areas will be maintained unless reasonable alternative access is provided to subsistence users. "Reasonable access" is access using means generally available to subsistence users. Lessees will consult the NSB, nearby communities, and native organizations for assistance in identifying and contacting local subsistence users.	Mitigation Measure is met. Great Bear is very sensitive to the interests of the local residents, particularly as it relates to subsistence activities. Throughout its years of activities in the project area, Great Bear has met with local leadership and communities and the NSB to collect input into how Great Bear's activities can be conducted in a manner that minimizes impacts to subsistence activities. Multiple meetings have been held in Utqiagvik, in 2011, 2014, and virtually in 2020 and 2021. A community meeting was held in Anaktuvuk Pass in 2014. There are no known subsistence activities that will be impacted by the project.
b. Before submitting a plan of operations that has the potential to disrupt subsistence activities, the lessee will consult with the potentially affected subsistence communities and the NSB (collectively "parties") to discuss the siting, timing, and methods of proposed operations and safeguards or mitigating measures that could be implemented by the operator to prevent unreasonable conflicts. The parties will also discuss the reasonably foreseeable effect on subsistence activities of any other operations in the area that they know will occur during the lessee's proposed operations. Through this consultation, the lessee will make reasonable efforts to ensure that exploration, development, and	Mitigation Measure is met. Great Bear is very sensitive to the interests of the local residents, particularly as it relates to subsistence activities. Throughout its years of activities in the project area, Great Bear has met with local leadership and communities and the NSB to collect input into how Great Bear's activities can be conducted in a manner that minimizes impacts to subsistence activities. Multiple meetings have been held in Utqiagvik, in 2011, 2014, and virtually in 2020 and 2021. A community meeting was held in Anaktuvuk Pass in

production activities are compatible with subsistence hunting and fishing activities and will not result in unreasonable interference with subsistence harvests.	2014. There are no known subsistence activities that will be impacted by the project.
4. Fuel, Hazardous Substances and Waste	
a. The lessee will ensure that secondary containment is provided for the storage of fuel or hazardous substances and sized as appropriate to container type and according to governing regulatory requirements in 18 AAC 75 and 40 CFR 112. Containers with an aggregate storage capacity of greater than 55 gallons that contain fuel or hazardous substances will not be stored within 100 feet of a waterbody, or within 1,500 feet of a current surface drinking water source.	Mitigation Measure is met. See Section 3 of the Plan of Operations Application.
b. During equipment storage or maintenance, the site must be protected from leaking or dripping fuel and hazardous substances by the placement of drip pans or other surface liners designed to catch and hold fluids under the equipment, or by creating an area for storage or maintenance using an impermeable liner or other suitable containment mechanism.	Mitigation Measure is met. See Section 3 of the Plan of Operations Application.
c. During fuel or hazardous substance transfer, secondary containment or a surface liner must be placed under all container or vehicle fuel tank inlet and outlet points, hose connections, and hose ends. Appropriate spill response equipment, sufficient to respond to a spill of up to five gallons, must be on hand during any transfer or handling of fuel or hazardous substances.	Mitigation Measure is met. See Section 3 of the Plan of Operations Application.
d. Vehicle refueling will not occur within the annual floodplain, except as addressed and approved in the plan of operations. This measure does not apply to water-borne vessels.	Mitigation Measure is met. See Section 3 of the Plan of Operations Application.
e. All independent fuel and hazardous substance containers must be marked with the contents and the lessee's or contractor's name using paint or a permanent label.	Mitigation Measure is met. See Section 3 of the Plan of Operations Application.

f. A fresh water aquifer monitoring well, and quarterly water quality monitoring, is required down gradient of a permanent storage facility, unless alternative acceptable technology is approved by ADEC.	N/A. No permanent storage facilities are proposed.
g. Waste from operations must be reduced, reused, or recycled to the maximum extent practicable. Garbage and domestic combustibles must be incinerated whenever possible or disposed of at an approved site in accordance with 18 AAC 60.	Mitigation Measure is met. See Section 4 of the Plan of Operations Application.
h. Proper disposal of garbage and putrescible waste is essential to minimize attraction of wildlife. The lessee must use the most appropriate and efficient method to achieve this goal. The primary method of garbage and putrescible waste is prompt, on-site incineration in compliance with State of Alaska air quality regulations. The secondary method of disposal is on-site frozen storage in animal-proof containers with backhaul to an approved waste disposal facility. The tertiary method of disposal is on-site non-frozen storage in animal proof containers with backhaul to an approved waste disposal facility. Daily backhauling of non-frozen waste is required unless safety considerations prevent it.	Mitigation Measure is met. See Section 4 of the Plan of Operations Application.
i. New solid waste disposal sites, other than for drilling waste, will not be approved or located on state property for exploration.	Mitigation Measure is met. See Section 4 of the Plan of Operations Application.
j. The preferred method for disposal of muds and cuttings from oil and gas activities is by underground injection. Drilling mud and cuttings will not be discharged into lakes, streams, rivers, or wetlands. On-pad temporary cuttings storage may be allowed as necessary to facilitate annular injection and backhaul operations. Injection of non-hazardous oilfield wastes is regulated by Alaska Oil and Gas Conservation Commission through its Underground Injection Control Program for oil and gas wells.	Mitigation Measure is met. See Section 4 of the Plan of Operations Application.
5. Access	
a. Exploration activities must be supported only by ice roads, winter trails, existing road systems, or air service. Wintertime off-road travel across tundra and wetlands may be	An exception to this Mitigation Measure is requested for the gravel driveways. See Response to MM 1(h), above.

approved in areas where snow and frost depths are sufficient to protect the ground surface	In addition, at each site both an ingress and egress driveway are proposed for multiple reasons. First, having one-way travel on each driveway minimizes the width of the driveway and improves safety which minimizes the risk of spills. Second, not requiring a turn-around area on the pad minimizes the size of the pad and the gravel that must be placed.
b. Summertime off-road travel across tundra and wetlands may be authorized subject to time periods and vehicle types approved by DMLW.	Mitigation Measure is met. Outside the footprint of the gravel pad and driveways, no tundra travel will be required.
c. Emergency exceptions may be granted by the Director of DMLW, and the Director, if it is determined that travel can be accomplished without damaging vegetation or the ground surface on a site-specific basis.	N/A. No emergency exceptions are currently requested.
d. Gravel use may be authorized on a site-specific basis if it is determined, after consulting with ADF&G and DMLW, that no practicable alternatives exist for constructing an exploration road or pad in the area south of the boundary described below and depicted in the map below: Beginning at the NPR-A boundary, from the northeast corner of T 1N, R 2E, then east to the northwest corner of T 1N, R 9E, then north to the northwest corner of T 4N, R 9E, then east to the northwest corner of T 4N, R 23E, then south to the southwest corner of T 4N, R 23E, and then east along the top of T 3N to the ANWR boundary.	An exception to this Mitigation Measure is requested. See response to MM 1(h) for justification for an exception.

Revised: 4/18/2018

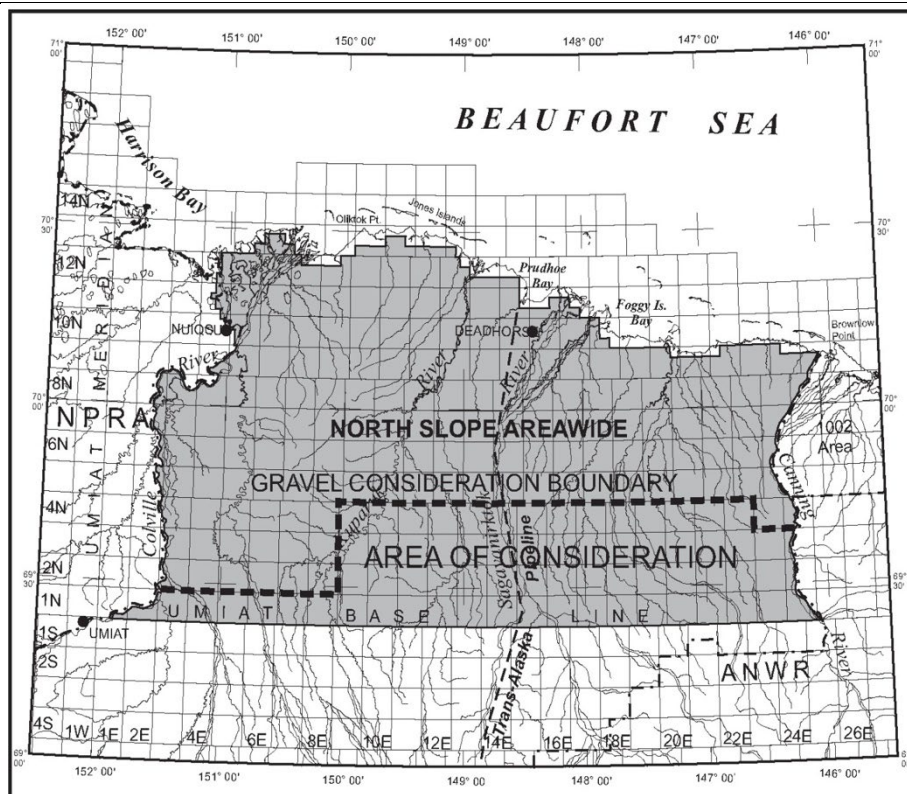


Figure 0.1.— Gravel Consideration Boundary

e. Public access to, or use of, the lease area may not be restricted except within the immediate vicinity of drill sites, buildings, and other related structures. Areas of restricted access must be identified in the plan of operations.

Mitigation Measure is met. The project will only result in restrictions to public access on the driveways and gravel pads constructed as part of the operation. No other restrictions to public access to the lease area will result from the project.

6. Prehistoric, Historic, and Archeological Sites	
a. Before the construction or placement of any structure, road, or facility supporting exploration, development, or production activities, the lessee must conduct an inventory of prehistoric, historic, and archeological sites within the area, including a detailed analysis of the effects that might result from that construction or placement.	Mitigation Measure is met. Cultural, historical, and archaeological resources field studies for site clearance were conducted in the summer of 2011 within the area associated with Great Bear's E&E Program to assess any known sites, and to locate unknown sites. Additional studies were conducted in each of the summers of 2012 - 2015 in association with Great Bear's seismic program which encompassed all of the Great Bear acreage position. These studies included the areas that will be part of the project. The studies included a records review and field surveys of the project areas. The records review included the Alaska Heritage Resources Survey (AHRS) database, maintained by the Office of History and Archeology within ADNRR; and the Traditional Land Use Inventory (TLUI) database, maintained by the NSB. No sites were identified in the studies that indicate that the project will impact cultural, historical, or archaeological resources. Each of the studies were submitted to the OHA and the NSB.
b. The inventory of prehistoric, historic, and archeological sites must be submitted to the Director and the Office of History and Archeology (OHA) who will coordinate with the NSB for review and comment. If a prehistoric, historic, or archeological site or area could be adversely affected by a lease activity, the Director, after consultation with OHA and the NSB, will direct the lessee as to the course of action to take to avoid or minimize adverse effects.	Mitigation Measure is met. See response to subsection (a), above.
c. If a site, structure, or object of prehistoric, historic, or archaeological significance is discovered during lease operations, the lessee shall report the discovery to the Director as soon as possible. The lessee shall make all reasonable efforts to preserve and protect the discovered site, structure, or object from damage until the Director, after consultation	Mitigation Measure is met. If such a discovery is made, this section will be followed.

with the State Historic Preservation Office and the NSB, has directed the lessee on the course of action to take for its preservation.	
7. Hiring Practices	
a. The lessee is encouraged to employ local and Alaska residents and contractors, to the extent they are available and qualified, for work performed in the lease area. Lessees shall submit, as part of the plan of operations, a hiring plan that shall include a description of the operator's plans for partnering with local communities to recruit, hire, and train local and Alaska residents and contractors. As a part of this plan, the lessee is encouraged to coordinate with employment and training services offered by the State of Alaska and local communities to train and recruit employees from local communities.	Mitigation Measure is met. Great Bear is committed to Alaska and local hire. Great Bear has located its office in Anchorage since 2011 and has no other focus than Alaska. To the best of its ability, Great Bear has strategically contracted with service providers already located in Alaska with employees resident in Alaska. It has strived to utilize Alaska contractors in its project development work, and it will continue to make all efforts to maximize Alaska hire in all aspects of its operations. As exploration moves to a development project, Great Bear will work with the North Slope Borough to attempt to recruit local residents for the project and impress upon its contractors to hire locals and Alaska residents to the best of their ability.
b. In accordance with Administrative Order 278, the lessee is encouraged to employ apprentice labor to perform at least 15 percent of total work hours, to the extent they are available and qualified, for work performed in the lease area. Lessees shall submit, as part of the plan of operations, a hiring plan detailing the means by which the lessee might incorporate apprentice labor.	Great Bear is committed to Alaska and local hire. However, for projects such as Alkaid #2 and Alkaid #3, Great Bear does not have the commercial ability to dictate staffing practices of our contractors. As Great Bear transitions into larger development and production project, Great Bear intends to insert into the RFQs for project bids a requirement to meet this standard in order to receive favorable consideration for a contract. Also, as Great Bear expands our internal workforce, we will adopt an apprentice program.
c. A plan of operations application must describe the lessee's past and prospective efforts to communicate with local communities and interested local community groups.	Mitigation Measure is met. Great Bear has met with officials and representatives of the North Slope Borough since 2010, and has visited multiple North Slope villages over the past ten years. Great Bear first briefed the NSB Assembly and Planning Commission in 2011 regarding wells proposed immediately adjacent to the locations of the Alkaid #2 and Alkaid #3 wells. Great Bear held community meetings in the villages of Utquiagvik and Anaktuvuk Pass to present the 2014-2015 Winter Exploration Program which included a well in

	the same general location as the Alkaid #2 and Alkaid #3 wells. Great Bear briefed the NSB Planning Commission prior to operations on the Talitha A well in December 2020.
d. A plan of operations application must include a training program i. for all personnel including contractors and subcontractors; ii. designed to inform each person working on the project of environmental, social, and cultural concerns that relate to that person's job; iii. using methods to ensure personnel understand and use techniques necessary to preserve geological, archeological, and biological resources; and iv. designed to help personnel increase their sensitivity and understanding of community values, customs, and lifestyles in areas where they will be operating.	A.7.d. Mitigation Measure is met. Great Bear and all contractor and subcontractor personnel will receive an HSE orientation. Additionally, the training program will be designed to inform each individual of the environmental, social and cultural concerns that relate to their job functions. Training components will include permit stipulations and requirements, cultural awareness, spill prevention and reporting, wildlife interaction, site specific safety, etc. All personnel will participate in a specific training program for bear safety and a briefing of the Bear Avoidance, Interaction, Mitigation, and Monitoring Plan. A.7.d.i. Mitigation Measure is met. A.7.d.ii. Mitigation Measure is met. A.7.d.iii. Mitigation Measure is met. A.7.d.iv. Mitigation Measure is met.
8. Definitions	

a. In this document: i. Facilities – Any structure, equipment, or improvement to the surface, whether temporary or permanent, including, but not limited to, roads, pads, pits, pipelines, power lines, generators, utilities, airstrips, wells, compressors, drill rigs, camps, and buildings. ii. Hazardous substance – As defined under 42 USC 9601 – 9675 (Comprehensive Environmental Response, Compensation, and Liability Act of 1980). iii. Important wetlands – Those wetlands that are of high value to fish, waterfowl, and shorebirds because of their unique characteristics or scarcity in the region or that have been determined to function at a high level using the hydrogeomorphic approach. iv. Minimize – To reduce adverse impacts to the smallest amount, extent, duration, size, or degree reasonable in light of the environmental, social, or economic costs of further reduction. v. Plan of operations – A lease plan of operations under 11 AAC 83.158 and a unit plan of operations under 11 AAC 83.346. vi. Practicable – Feasible in light of overall project purposes after considering cost, existing technology, and logistics of compliance with the mitigation measure. vi. Secondary containment – An impermeable diked area, portable impermeable containment structure, or integral containment space capable of containing the volume of the largest independent container. The containment shall, in the case of external containment, have enough additional capacity to allow for local precipitation. vii. Temporary – No more than 12 months.	
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