STATE OF ALASKA
DEPARTMENT OF NATURAL RESOURCES

Analysis and Proposed Decision
Trans-Alaska Pipeline System Right-Of-Way Lease Amendment, ADL 63574
Strategic Riprap Stockpiles at Pipeline Mileposts 77.5, 78.25, 81, And 82.4

Proposed Action: The Department of Natural Resources (DNR) received a request from Alyeska Pipeline Service Company (APSC), agent for the Trans-Alaska Pipeline System (TAPS) lessees, to amend the TAPS Right-of-Way (ROW) Lease, ADL 63574, to add a total of approximately 26.1 acres of State land to the ROW along TAPS on the east bank of the Sagavanirktok (Sag) river, about 77 to 82 miles south of Deadhorse, Alaska.

APSC proposes to stockpile riprap along the TAPS ROW at four locations between the east bank of the Sag River and the west ROW boundary between Pipeline Mileposts 77 and 83. These stockpiles would protect the buried pipe from flood events and would be used for emergency work, if necessary, along this reach of the river where the pipeline and its work pad are not road accessible.

The approximate dimensions and acreage for each area are as follows:

PLMP	Length (ft)	Width (ft)	Acres
77.5	1,925	100	4.4
78.25	2,050	100	4.7
81	2,375	200	10.9
82.4	2,675	100	6.1

The additional land is necessary to support the existing pipeline system as defined in AS 38.35.230(7) and authorized in the TAPS ROW Lease, ADL 63574.

Authority: AS 38.35.015 and the TAPS ROW Lease, ADL 63574.

Administrative Record: The TAPS ROW Lease, ADL 63574, and the associated ROW Lease Amendment case files constitute the administrative record.

Location: The proposed ROW additions are lands adjacent to the westerly boundary of the TAPS ROW located within the Umiat Meridian in the following areas:

PLMP 77.5 within the NW1/4 of Section 9, Township 3 South, Range 14 East;

PLMP 78.25 within the SW1/4 of Section 9 and the NW1/4 of Section 16, Township 3 South, Range 14 East;

PLMP 81 within the E1/2 of Section 29, Township 3 South, Range 14 East; and

PLMP 82.4 within the SW1/4 of Section 32, Township 3 South, Range 14 East, and the NW1/4 of Section 5, Township 4 South, Range 14 East.

The proposed ROW additions total approximately 26.1 acres, as depicted in Attachment A.

Background: The TAPS ROW lease was originally issued on May 3, 1974, for a term of 30 years. The lease was renewed for an additional 30-year term effective May 2, 2004. APSC is the agent for the TAPS ROW lessees: Harvest Alaska, LLC, ConocoPhillips Transportation Alaska, Inc., and ExxonMobil Pipeline Company LLC. These corporations have remained in good standing during the lease term and possess valid State of Alaska business licenses.

The Sag River is a dynamic, braided river with an expansive floodplain. Along the Lower Sag, the pipeline is shallow buried in alluvial gravel within the floodplain. A number of revetment and erosion control structures have been constructed along the Sag River to protect the pipeline, such as buried sills, spur dikes, diversion dikes, buried channel weirs, rock vanes, and channel plugs. At approximately PLMP 76 and Dalton Highway Milepost (DHMP) 340, the TAPS ROW crosses from the west bank of the Sag River to the east bank, where it continues south for approximately six (6) miles until it crosses the Sag River again, returning to the west bank at approximately PLMP 84 and DHMP 332. This span of the ROW can only be accessed by strategic river crossings during periods of low water or frozen conditions, or by air.

Application Public Notice: Public Notice of the ROW amendment request was posted on the State of Alaska Online Public Notice and Division of Oil and Gas Newsroom webpages on Wednesday, July 22, 2026. The Public Notice was sent for posting to the Tuzzy Consortium Library Utqiaġvik and the U.S. Post Offices in Utqiaġvik and Prudhoe Bay. In addition, the Public Notice was published in the Anchorage Daily News on July 22, 2026, and in the Arctic Sounder on July 30, 2026.

Pursuant to AS 38.35.070, the following coordinate agencies were notified of the application and associated documents: the Regulatory Commission of Alaska and the Alaska Departments of Labor & Workforce Development, Transportation & Public Facilities, and Environmental Conservation. The following additional agencies were also notified of the application and associated documents: the Alaska Oil and Gas Conservation Commission, and the Alaska Departments of Fish and Game, Public Safety, and Revenue.

The Office of History and Archaeology (OHA) State Historic Preservation Office was provided with copies of the amendment application and Public Notice of the application. If inadvertent discoveries of cultural resources occur during project activities, OHA must be notified to evaluate whether the resource should be preserved in the public interest pursuant to AS 41.35.070(d). Examples of cultural resource sites that can be encountered include: historical cabin remains, adits, dredges, mining equipment, cultural depressions or pits, graves or cemeteries, tools, artifacts, and paleontological remains.

No comments on the application have been received.

Project Description: APSC proposes to place linear stockpiles of riprap along and parallel to the west boundary of the ROW, between the buried pipe and the riverbank. The proposed amendment areas would be mechanically brushed, as needed, and equipment used in the project would include dump trucks, rock trucks, loaders, excavators, and light-duty trucks. The stockpiles would serve a dual purpose: a) to intercept erosion toward the pipeline during a flood event; b) to be used as needed in case of an emergency on this reach of the river with limited access. The riprap would be placed with sufficient buffer from the buried pipe to avoid causing damage to the pipe during a flood event. Project work is anticipated to last approximately three-to-four weeks.

Title: The State of Alaska holds fee title to the subject lands.

Sections 9, 16, 29, and 32 of Township 3 North, Range 14 East, Umiat Meridian were Tentatively Approved (TA) on August 19, 1992, under TA numbers 1992-0062 and 1992-0065, recorded in the Barrow Recording District on August 31, 1992, as document numbers 1992-000788-0 and 1992-000786, respectively. The United States excepts and reserves a ROW thereon for ditches or canals constructed by the authority of the United States Act of August 30, 1890, 26 Stat. 391, 43 U.S.C. 945. In Section 29, the United States also excepts and reserves a ROW, F-86923, granted to the Bureau of Land Management for an Administrative site under the provisions of the Federal Land Policy and Management Act of 1976, Public Law 94-579, 90 Stat. 2781, 43 U.S.C. 1767.

Section 5, Township 4 South, 14 East, Umiat Meridian was patented on June 15, 2016, under patent number (PA) 50-2016-0056, recorded in the Barrow Recording District on June 27, 2016, as document number 2016-000476-0. The United States excepts and reserves a ROW thereon for ditches or canals constructed by the authority of the United States Act of August 30, 1890, 26 Stat. 391, 43 U.S.C. 945.

Additionally, riparian rights entitle the State of Alaska to the title of the bed of the Sag River along the proposed amendment areas, as the State is the upland landowner.

Planning and Classification: The proposed ROW additions are within the North Slope Area Plan (NSAP), adopted on March 12, 2021, and fall within the Dalton Corridor Region. The ROW additions at PLMP 77.5, 81, and 82.5 are within the Dalton Highway Corridor Unit (D-01), and the ROW addition at PLMP 78.25 is within the Dalton Highway Corridor and the Atigun-Sag River Unit (D-01 and D-07, respectively). Vegetation in these units consists of tussock tundra with dispersed shrubs, alder and willow shrublands, freshwater marshes, and wet meadows. In the central portions of these units, where the proposed additions are located, caribou, moose, musk ox, brown bears are present; and peregrine falcon, gyrfalcon, rough-legged hawk, golden eagle, and breeding buff-breasted sandpipers are concentrated in elevated areas along the Sagavanirktok River. Riparian shrub habitat is important for breeding passerines, and poplar groves provide necessary habitat for gray-headed chickadees.

The lands within Unit D-01 are designated as Habitat/Public Recreation-Dispersed/Transportation Corridor, which converts to a classification of Wildlife Habitat Land/Public Recreation Land/Transportation Corridor Land. The Unit is to be managed as a utility and transportation corridor to facilitate transportation of oil and gas resources from the North Slope to facilities in other areas of the state and to support subsistence hunting, fishing and gathering, recreation, and sport hunting opportunities. Linear transportation and infrastructure projects are appropriate within the unit. Impacts to fish and wildlife habitat values and harvest opportunities are to be minimized. Decisions related to development shall consider potential impacts on the habitat and harvest values and include stipulations, conditions, and measures that will avoid, minimize, or mitigate potential negative effects. DNR shall consult ADF&G regarding authorizations involving uses that may impact polar bear and brown bear denning sites, core musk ox habitat, Dall sheep concentration areas, mineral licks, and anadromous waterbodies. All uses should also consider potential impacts on migratory waterfowl and promote protection of water quality. Continuity in existing transportation and pipeline operations shall be provided for consistent with the public and industrial needs, and opportunities for subsistence and other beneficial uses shall be maintained. Heritage sites shall be protected.

The lands within Unit D-07 are designated as Habitat/Materials/Public Recreation-Dispersed (Ha/Ma/Rd), which converts to a classification of Wildlife Habitat Land/Material Land/Public Recreation Land. The management intent of this Unit is to protect wildlife habitat and subsistence values, water quality, material resources, and public recreation opportunities. Authorizations issued involving long-term uses are to consider potential impacts on moose wintering habitat, musk ox concentrations, Dall sheep concentrations, and caribou calving and migration corridors. The NSAP states that DNR shall consult with ADF&G prior to authorization issuance, as well as with the U.S. Fish & Wildlife Service where polar bears are present.

State and Federal agencies will be provided with the opportunity to comment on the Analysis and Proposed Decision for the ROW Lease amendment, and APSC is required to adhere to all local, state, and federal regulations regarding the protection of wildlife and the environment. APSC must adhere to all stipulations outlined in the TAPS ROW Lease, as well as approved quality assurance, surveillance and monitoring, and wildlife avoidance and interaction plans and programs. With these measures in place, the proposed ROW Lease amendment complies with the management intent of the NSAP.

Under 11 AAC 96.014, for the North Slope Area (ADL 50666), all state lands are designated in the Umiat Meridian as "special use land" This designation requires that, in addition to permitting requirements under 11 AAC 96.010, a permit is required for motorized vehicle use, unless that use is for subsistence purposes or is on a graveled road. The requirement for a permit or authorization would be fulfilled through the issuance of the proposed TAPS ROW Lease amendment. This requirement does not prohibit the development of lands within the Umiat Meridian and does not prohibit the proposed action.

The Alaska Legislature designated the Dalton Highway Corridor a special use site or Legislatively Designated Area (LDA) under AS 19.40. Pursuant to AS 19.40.200(a), the state may not dispose of state land within five miles of the highway ROW. However, AS 19.40.200(b)(4) states the prohibition on disposal of state land under (a) of this section does not apply to a disposal for lands necessary for exploration, development, production or transportation of oil or gas in this area. This designation does not prohibit the proposed ROW amendment, which is in support of TAPS.

Decision Public Notice: On November 2, 2026, notice of this Analysis and Proposed Decision for the lease amendment request will be published on the State of Alaska Online Public Notice webpage and the Division of Oil and Gas Newsroom webpages. The notice will be sent for posting to the Tuzzy Consortium Library in Utqiaġvik and the U.S. Post Offices in Utqiaġvik and Prudhoe Bay. The Public Notice will also be published in the Anchorage Daily News on November 8, 2026, and in the Arctic Sounder on November 12, 2026. Written comments must be received by close of the comment period, which is at 5:00 p.m. on December 2, 2026.

If public comment indicates the need for significant changes in the proposed decision, additional public notice will be given on or after December 2, 2026. If no significant change is required, the proposed decision, including any minor changes, will be issued as the final decision of DNR after December 2, 2026, without further notice.

Analysis: AS 38.35, the Alaska Right-of-Way Leasing Act, sets forth the procedures by which certain ROW leases are granted by the State of Alaska and the conditions under which they can be amended. Pursuant to AS 38.35.010, it is the policy of the state that development, use, and

control of a pipeline transportation system make the maximum contribution to the development of human resources of this state, increase the standard of living for all its residents, advance existing and potential sectors of its economy, strengthen free competition in its private enterprise system, and carefully protect its incomparable natural environment.

Pursuant to AS 38.35.015, the Commissioner has the power to grant leases of state land for pipeline ROW purposes. The Commissioner found it to be in the best interest of the residents of the State of Alaska to issue the TAPS ROW Lease, ADL 63574, on May 3, 1974, and the Renewal and Amendment of the ROW Lease effective May 2, 2004. The terms, conditions, stipulations, and reservations contained in the TAPS ROW Lease, ADL 63574, will apply to these lands if added to the Lease.

AS 38.35.020(a) requires the applicant to obtain a ROW lease for state land from the Commissioner for pipeline purposes. The proposed riprap stockpiles will protect the pipe from a flood event rapidly eroding toward the pipe and will be readily available if needed for other TAPS ROW emergency uses in an area with limited access.

Findings: The proposed project and ROW Lease additions are necessary for protecting the integrity of TAPS. The riprap stockpiles are considered "related Facilities," as defined by the lease, and will be managed under the lease. The proposal to add the above-described land to the TAPS ROW Lease, ADL 63574, is consistent with the lease. The terms, conditions and stipulations contained in the TAPS ROW Lease, ADL 63574, adequately address and protect the interests of the State of Alaska. The riprap stockpiles will protect the pipeline from exposure and damage during flood events.

An as-built survey is required for the amendment to identify the additional ROW areas and to depict the locations of the riprap stockpile areas in relation to the control line survey of the TAPS ROW. The as-built survey is to be submitted for review and acceptance by the Commissioner, pursuant to Section 1(e) of the TAPS ROW Lease, ADL 63574, as amended. The addition of these lands to the lease does not constitute a significant amendment to the lease; since the impact on state resources will be negligible and the project does not conflict with or significantly change the existing use of the land. Approval of the request for the amendment to add the described land is consistent with state statutes and the terms of the lease. The lessee is required to secure all necessary permits or authorizations required by other local, state, and federal agencies.

Proposed Decision: I find that the request to amend the Right-of-Way Lease for the Trans-Alaska Pipeline, ADL 63574, to include the lands described in this proposed decision is in the best interest of the state and does not constitute a significant amendment to the lease.

If no significant change is required due to public comment or objection, then the proposed decision, including any minor changes, will be issued as the final decision of the Department of Natural Resources on or after December 2, 2026, without further notice.

DocuSigned by:
Anthony Strupulis
F22C54B322C14CA...

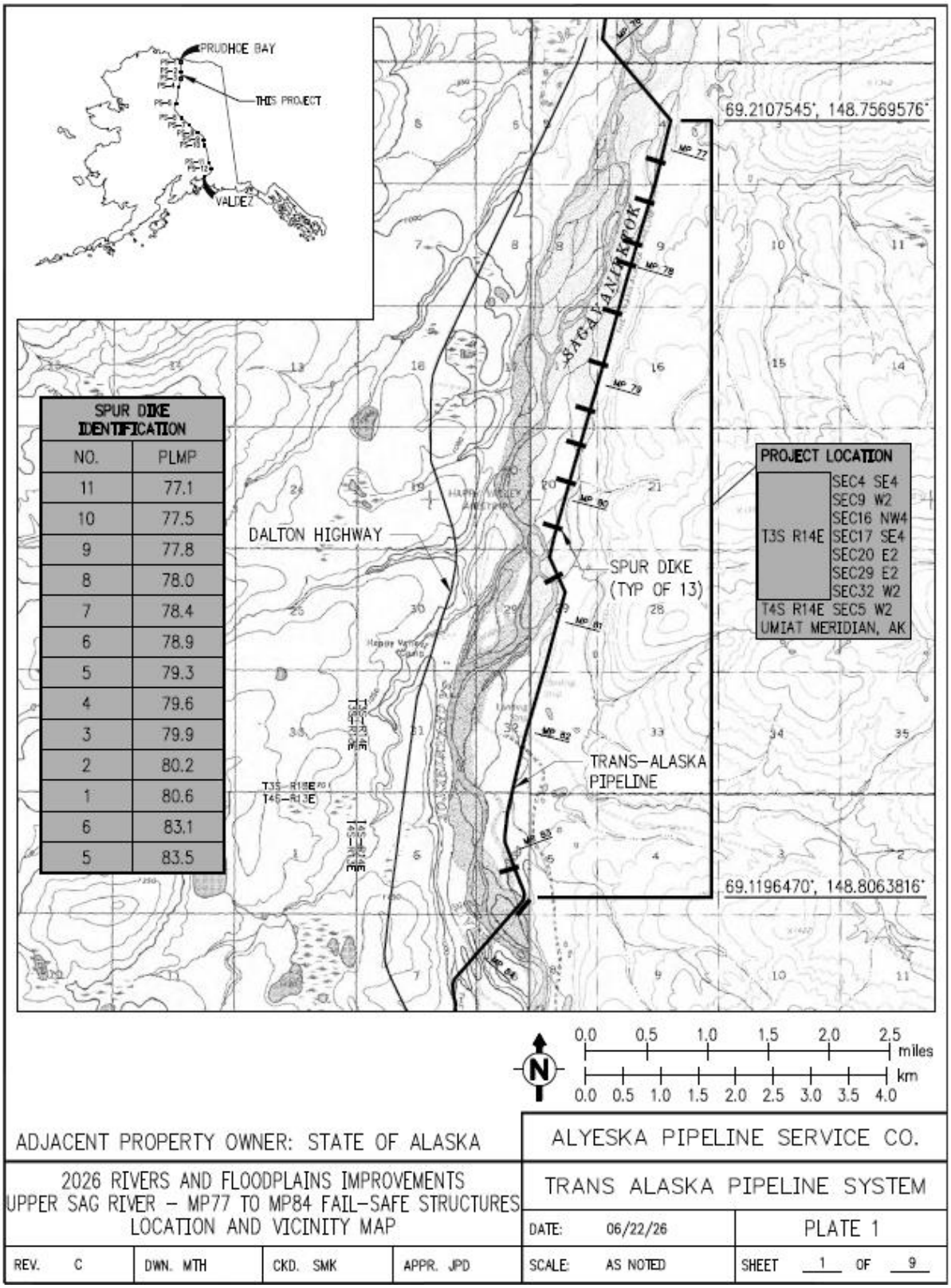
11/2/2026

Anthony Strupulis P.E.
State Pipeline Coordinator

Date

Attachment A: Trans-Alaska Pipeline System, 2026 Rivers and Floodplains Improvements, Upper Sag River – MP77 to MP84 Fail-Safe Structures, Dated June 22, 2026: Location and Vicinity Map, Plate 1; and Strategic Riprap Stockpiles, Plate 2 (2 Pages)

Attachment A



Attachment A

