**STATE OF ALASKA**
**DEPARTMENT OF NATURAL RESOURCES**

# Analysis and Proposed Decision
# Trans-Alaska Pipeline System Right-Of-Way Lease Amendment, ADL 63574
# Middle Fork Koyukuk River Scour Protection, Pipeline milepost 208

**Proposed Action:** The Department of Natural Resources (DNR), pursuant to Alaska Statute

(AS) 38.35.050, 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 additional state lands at a TAPS crossing of the Middle Fork Koyukuk River.

APSC proposes to install a grade control sill consisting of riprap downstream of the pipe at Pipeline Milepost (PLMP) 208 to protect the below ground pipe from local scour located upstream from the pipe that is encroaching upon the vicinity of the buried pipe. The proposed addition is below ordinary high water point adjacent to the westerly and easterly TAPS ROW boundary and contains approximately 2.63 acres.

The proposed grade control sill project is described in more detail below in the Project Description section and project drawings are attached (Attachment A). Once construction activities conclude, the added ROW land will be surveyed and may include less acreage than approved for in this amendment.

The additional land is necessary to support the existing pipeline system as defined in Alaska Statute (AS) 38.35.230(8) 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 addition for the grade control sill is adjacent to the TAPS ROW at PLMP 208 and is located within the SE1/4 and NW1/4 of Section 9, Township 32 North, Range 10 West, Fairbanks Meridian. The proposed ROW additions total approximately 2.63 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 Koyukuk River flows south and is a widely braided, gravel-bed system with multiple sub-channels extending across the floodplain. The floodplain is approximately one-half mile wide. The TAPS ROW and the proposed amendment cross the Middle Fork Koyukuk. Over the past decade, continued bank erosion has occurred upstream of the pipeline crossing due to channel migration. These changes in flow patterns have concentrated flow along the north bank and caused localized streambed degradation within the active floodplain near the pipeline.

**Public Notice – Application**: Public notice of the ROW amendment request was posted on the State of Alaska Online Public Notice system and the Division of Oil and Gas Newsroom webpages on Wednesday, August 26, 2026. The notice was also sent to the Noel Wien Public Library and to the U.S. Post Offices in Coldfoot and Fairbanks for posting on the same date. In addition, the public notice was published in the Anchorage Daily News and the Fairbanks Daily News-Miner on August 26, 2026.

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

The Office of History and Archaeology (OHA) State Historic Preservation Office was provided with copies of the amendment application documents 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.

**Public Notice – Analysis and Proposed Decision**: Notice of this Analysis and Proposed Decision for the lease amendment request will be posted on the State of Alaska online Public Notice webpage, and on the Division of Oil and Gas Newsroom webpages on November 4, 2026. This Notice will also be sent for posting in the Noel Wein Public Library in Fairbanks, AK and the U.S. Post Offices in Fairbanks and Cold Foot on November 4, 2026, and published in the

Anchorage Daily News on November 8, 2026, and the Fairbanks Daily News-Miner on November 6, 2026.

If public comment indicates the need for significant changes in the proposed decision, additional public notice will be given on or after December 4, 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 4, 2026, without further notice.

**Project Description:** The grade control sill project site at PLMP 208 is located approximately 30 miles north of Coldfoot, Alaska, and 42 miles south of Pump Station 4. It is situated below ordinary high water, adjacent to the western and eastern sides of the TAPS ROW, at a crossing of the Middle Fork Koyukuk River. According to APSC's application, vegetation in the area includes grasses, willows, birch, cottonwood, and black spruce. The soils are described as gravel and sand overlain by a layer of silt.

APSC proposes to install an initial grade-control rock structure downstream of the buried pipe and to fill a depression within the vicinity of the pipeline. Access to the site will be from the north, using the existing pipeline workpad drive lane. Equipment expected to be used for the project includes front-end loaders, a backhoe, and trucks. APSC has requested a project start date of April 15, 2027, and the work is anticipated to take approximately 10 days to complete.

APSC states in their application that all work will be scheduled to occur during low flow periods and they will avoid work when water stages are high. Only the equipment bucket is expected to be in contact with running water. In order for the equipment to reach and place rock in the area of interest, which is farther from the bank, the grade control structure near the north bank will be temporarily raised above water level with the aid of placing additional rock. The temporary platform (a diversion berm) will provide a necessary footprint for the excavator to park and perform work. Once completed the additional fill material used to build the platform will be removed. Additionally, there may be work done to extend the structure to the south in the fall. The project will aim to minimize adverse impacts to water flow, the floodplain, and existing vegetation in riparian areas. No wetlands will be affected, and no additional mitigation is proposed.

APSC currently holds a Land Use Permit, LAS 36166, authorizing use of an upland for temporary construction area to facilitate the installation of grade control in support of TAPS maintenance and repair work in the Middle Fork Koyukuk River floodplain area. The permit became effective on August 24, 2026, and expires on August 23, 2027.

**Title:** The State received Tentative Approval (TA) to Section 9 of Township 32 North, Range 10 West, Fairbanks Meridian (TA No. 2026-0002) from the Department of the Interior, Bureau of

Land Management (BLM), on May 5, 2026, under TA No. 2026-0002. TA 2026-0002 excepts and reserves to the United States a ROW for ditches and canals.

The land in Section 9 is subject to:

- Existing rights as defined by Section 906(1) of the Alaska National Interest Lands Conservation Act;
- A ROW grant issued to the University of Alaska Fairbanks for research sites;
- A ROW subject to acceptance of offer and payment of fees for fiber optic cable issued to GCI Fiber Communication Co. Inc;
- A ROW grant to 8 Star Alaska LLC for a natural gas pipeline;
- A ROW issued to BorTek, LLC for a fiber optic line and regeneration site;
- A ROW issued to Quintillion Networks, LLC for a fiber optic line, regeneration site, crew camp, and material storage site;
- And numerous Special Recreation Permits.

**Planning and Classification:** The lands encompassed in the proposed ROW addition are included in the Northeast Alaska Area Plan (NEAAP), Management Unit D-01. The primary designations in Unit D-01 are Transportation Corridor, Habitat and Public Recreation Dispersed. These designations convert to classifications of Habitat Land, Transportation Corridor Land and Public Recreation Land. The management intent for these lands is for it 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. Also to provide continuity in existing transportation and pipeline operations and for future linear projects consistent with public and industrial needs.

The proposed ROW addition is intended solely to support maintenance activities along a segment of TAPS. As such, it aligns with the NEAAP's management intent of this area as a utility and transportation corridor. TAPS remains a vital component of the state's oil and gas infrastructure, supporting ongoing development, maintenance, and operations.

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 NEAAP.

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 as special use land 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 James Dalton Highway Legislatively Designated Area is designated under AS 19.40.010. Pursuant to AS 19.40.200(a), the state may not dispose of state land under AS 38 that is within five miles of the highway right-of-way. However, AS 19.40.200(b)(4)(c) states that 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.

**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 the 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 national 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 on May 2, 2004. The terms, conditions, stipulations, and reservations contained in the TAPS ROW Lease, ADL 63754, 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. At PLMP 208, the buried pipeline crosses the braided Middle Fork Koyukuk River within the active floodplain. Over the past decade, continuing bank erosion has occurred upstream of the pipeline crossing as a result of channel changes. These changes in channel morphology and flow patterns have concentrated flow along the north bank, resulting in local stream degradation in the vicinity of the buried pipeline.

Local scour upstream of the pipeline crossing is now encroaching on the buried pipe. Rock groynes and a grade-control sill will therefore be required to provide protection to the pipeline in

the vicinity of the crossing. These measures will improve flow alignment, reduce flow concentration along the north bank, and limit further local scour and stream degradation, thereby improving the long-term stability and protection of the buried pipeline. The amendment area would provide APSC with sufficient working space to mobilize personnel and equipment, haul and stage riprap and gravel, and establish the required structure footprint. Construction would involve installing the grade-control structure from the north bank, temporarily raising the structure elevation near the bank to create a working platform, and progressively placing rock to complete the structure. Clean gravel would then be placed in the upstream depression in the vicinity of the pipeline. Upon completion, temporary rock used for the working platform would be removed, excess materials would be disposed of, and the work area would be restored and cleaned up prior to demobilization of personnel and equipment.

Erosion control structures and storage and staging areas are addressed under Stipulation 1.1.1.36 of the Trans-Alaska Pipeline ROW Lease, ADL 63574 that defines "Related Facilities", as "… those structures, devices and improvements and sites, the substantially continuous use of which is necessary for the operation or maintenance of the oil transportation pipeline, including … (8) retaining walls, berms, dikes, ditches, cuts and fills, including hydraulic control structures; … (9) storage buildings and structures, and areas for storage of supplies and equipment".

Because the sites are outside the existing ROW boundaries, they require an additional disposal of interest in state land beyond what was included in the original terms of the TAPS ROW Lease, ADL 63574. An amendment to the lease is required when there is a disposal of interest in state land or resources beyond what was reviewed and approved during the original adjudication.

**Findings:** The proposed project and ROW Lease additions are integral to the protection of TAPS. The grade control sill and staging areas 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 grade control sill installation project at PLMP 208 will reduce flow concentration along the riverbank, and limit further local scour and stream degradation, thereby protecting the buried pipeline.

An as-built survey is required for the amendment to identify the additional ROW areas and to depict the locations of the buried grade control sill and staging area 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 land described 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 after December 4, 2026, without further notice.

DocuSigned by:
Anthony Strupulis
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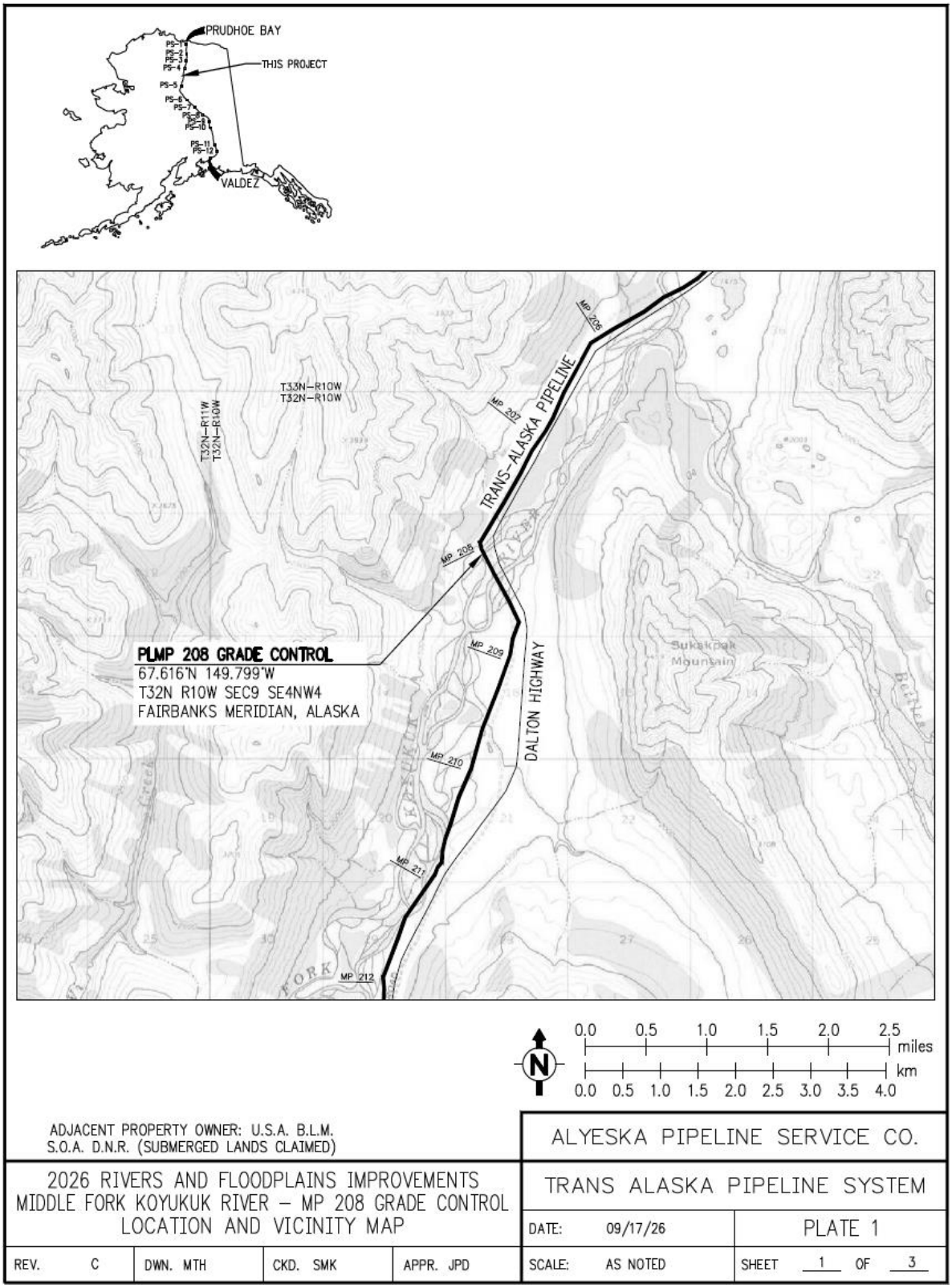
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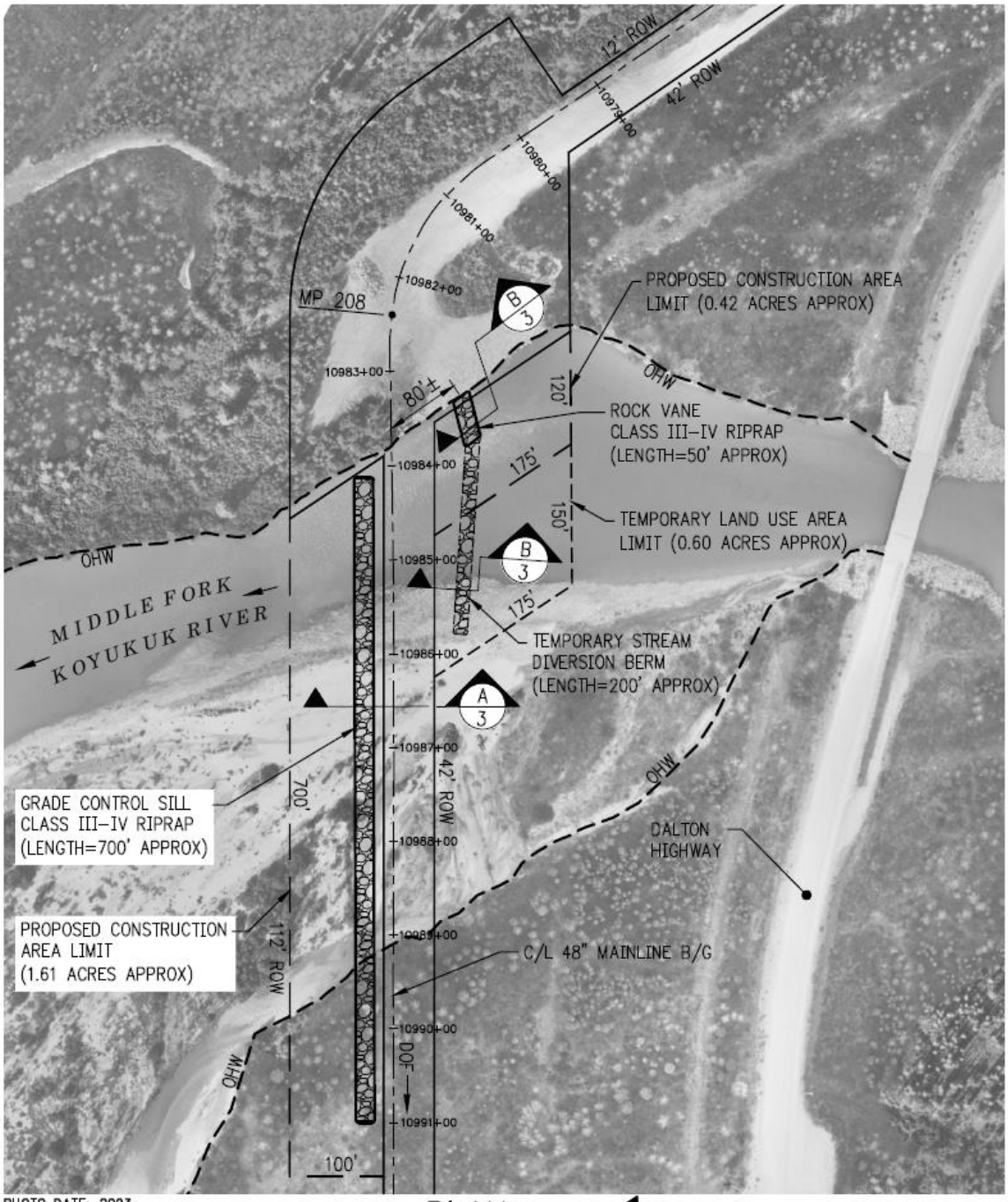
Anthony Strupulis P.E.
State Pipeline Coordinator

Date

Attachment A: Trans-Alaska Pipeline System, 2026 Rivers and Floodplain Improvements Middle Fork Koyukuk River – MP 208 Grade Control & ROW Location and Vicinity Map, Dated August 17, 2026, Plates 1 and 2 (2 Pages)

## Attachment A






PLAN
SCALE: 1" = 150'

ADJACENT PROPERTY OWNER: U.S.A. B.L.M.
S.O.A. D.N.R. (SUBMERGED LANDS CLAIMED)

ALYESKA PIPELINE SERVICE CO.

2026 RIVERS AND FLOODPLAINS IMPROVEMENTS
MIDDLE FORK KOYUKUK RIVER – MP 208 GRADE CONTROL PLAN

TRANS ALASKA PIPELINE SYSTEM

| REV. C | DWN. MTH | CKD. SMK | APPR. JPD | DATE: 09/17/26 | PLATE 2 |
|---|---|---|---|---|---|
| | | | | SCALE: AS NOTED | SHEET 2 OF 3 |