

**ALASKA WILDERNESS LEAGUE—CENTER FOR BIOLOGICAL DIVERSITY—  
DEFENDERS OF WILDLIFE—EARTHJUSTICE— EYAK PRESERVATION  
COUNCIL—GREENPEACE—NATIONAL AUDUBON SOCIETY—NATURAL  
RESOURCES DEFENSE COUNCIL—NORTHERN ALASKA ENVIRONMENTAL  
CENTER—OCEANA—OCEAN CONSERVANCY— OCEAN CONSERVATION  
RESEARCH—RESISTING ENVIRONMENTAL DESTRUCTION ON INDIGENOUS  
LANDS (REDOIL)—SIERRA CLUB—THE WILDERNESS SOCIETY—WORLD  
WILDLIFE FUND**

March 25, 2013

**VIA EMAIL**

Director James Watson  
Bureau of Safety and Environmental Enforcement  
Department of the Interior  
1849 C Street, N.W., Room 5412  
Washington, D.C. 20240  
E: [james.watson@bsee.gov](mailto:james.watson@bsee.gov)

**Re: Public Input on ConocoPhillips' Chukchi Oil Spill Response Plan**

Dear Director Watson:

In 2011, our organizations greatly appreciated the opportunity to provide public comments on Shell's Beaufort and Chukchi Oil Spill Response Plans, recognizing that it was the first time the federal government had solicited public input before making a decision on spill plans. This decision was made, in part, due to the known sensitivity of the Arctic marine environment. Public input into federal decisions can improve those decisions and increase public confidence in government and the decisions made.

Since at least February 2012 the Bureau of Safety and Environmental Enforcement (BSEE) has been reviewing ConocoPhillips' Chukchi Sea Oil Spill Response Plan but has not made the plan available for public review and has yet to make clear whether it will provide for public comment on the plan. We request that you provide at least 90 days for, and encourage, public comment before BSEE makes its decision on this important plan, due to the highly sensitive nature of the environment, the remoteness from infrastructure, and the frontier nature of Arctic Ocean drilling.

A major oil spill in the Chukchi Sea poses extraordinary risks to fragile Arctic marine ecosystems and the coastline including the extraordinary fish and wildlife species that reside there all or part of the year. These species include endangered bowhead whales, threatened polar bears, beluga whales, walrus, seals, and threatened Steller's and spectacled eiders, among others. And very importantly, a major oil spill also would harm people who live in the Arctic and depend on the Chukchi Sea for subsistence and to maintain their cultural traditions, and to whom the United States owes a trust responsibility.

A major spill in the Chukchi Sea would occur hundreds of miles from the nearest Coast Guard station, and recovery would be hampered by the constant threat of sea ice, low temperatures, high winds, fog, and long periods of darkness. There is no proven technology that can recover more than a small percentage of spilled oil from America's Arctic waters.

Recently, the Department of the Interior released its 60-day "Review of Shell's 2012 Alaska Offshore Oil and Gas Exploration Program." This review recognized the "unique and challenging conditions associated with offshore oil and gas exploration on the Alaskan OCS" and characterized "transparency and opportunity for public input" as "important" and "an area of success from the 2012 experience that should be carried forward and improved upon in the future." Moreover, the post-BP tragedy's National Oil Spill Commission specifically recommended that oil spill response "[p]lans should . . . be made available for a public comment period prior to final approval[.]" We hope that BSEE will follow these explicit recommendations.

Finally, in July 2012, several of the undersigned groups sent BSEE a Freedom of Information Act (FOIA) request, asking the agency to make ConocoPhillips's spill plan and any related materials available to the public. To date, BSEE has provided nothing to the requesting groups. In order to facilitate public review of the ConocoPhillips plan, we again request that BSEE make public now information about the ConocoPhillips plan.

The Department of the Interior repeatedly has stated that it will hold all Arctic drilling to the highest standards and that this approach is important to protect Arctic peoples and wildlife as well as to set an example for other nations. Making critical decisions on fundamental aspects of Arctic drilling such as oil spill response plans with full public involvement will foster the achievement of Interior's stated goals.

In sum, we request that BSEE make ConocoPhillips, and all other proposed Arctic oil spill response plans and accompanying National Environmental Policy Act and Endangered Species Act consultation documents available for public review and comment.

Thank you very much for your attention to this important issue.

Sincerely,



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Cindy Shogan  
Executive Director  
Alaska Wilderness League



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Mary Beth Beetham  
Director of Legislative Affairs  
Defenders of Wildlife



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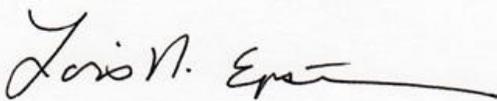


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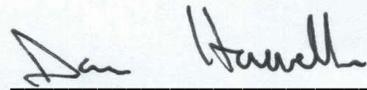


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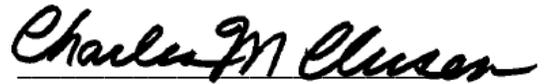
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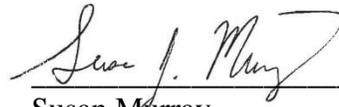
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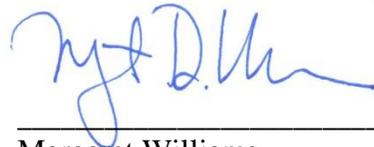
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cc: Tommy Beaudreau, Acting Assistant Secretary for Land and Minerals Management