



US Army Corps
of Engineers
Alaska District

Public Notice of Application for Permit

ANCHORAGE
Regulatory Division (1145)
CEPOA-RD
Post Office Box 6898
JBER, Alaska 99506-0898

PUBLIC NOTICE DATE: October 3, 2016
EXPIRATION DATE: November 4, 2016
REFERENCE NUMBER: POA-2016-483
WATERWAY: Beaufort Sea

Interested parties are hereby notified that a Department of the Army permit application has been received for work in waters of the United States as described below and shown on the enclosed project drawings.

Comments on the described work, with the reference number, should reach this office no later than the expiration date of this Public Notice to become part of the record and be considered in the decision. Please contact Steve Moore at (907) 753-5713, toll free from within Alaska at (800) 478-2712, by fax at (907) 753-5567, or by email at stephen.a.moore2@usace.army.mil if further information is desired concerning this notice.

APPLICANT: BP Exploration (Alaska) Inc.
Holly Willman
P.O. Box 199612
Anchorage, AK 99519-6612

LOCATION: The project site is located within Section 16, T. 11 N., R. 13 E., Umiat Meridian; USGS Quad Map Beechey Point B-4; Latitude 70.310917° N., Longitude 148.862895° W.; at BPXA's existing Gathering Center 2 (GC2) facility, approximately 12 miles northwest of Deadhorse, Alaska.

PURPOSE: The applicant's stated purpose is to provide a safe location for workers to perform non-operational tasks such as training, breaks, meetings, and management/administrative tasks at the existing GC2 facility.

PROPOSED WORK: Placement of approximately 15,000 cubic yards of clean gravel fill into 2.05 acres of wetlands in order to expand the existing GC2 pad to accommodate the

installation and operation of a Blast Resistant Module (BRM). Specifically, the proposed work involves:

1. Gravel Pad Expansion

- Placement of approximately 15,000 cubic yards of gravel to expand the existing pad by approximately 2.05 acres to allow room for the BRM installation.

- Placement of approximately 13,000 cubic yards of gravel in Area 1 (~1.75 acres) to allow room for the BRM facility, associated parking, access for maintenance equipment, and to provide access for fire suppression equipment.

- Placement of approximately 2,000 cubic yards of gravel in Area 2 (~0.3 acres) to allow access to the BRM from the pad entrance road and to provide a safe buffer from the electrical substation that is adjacent to the road.

- Cut and cap an existing power pole structure and an existing VSM approximately 6 inches above the ground in the area of the pad expansion.

- Equipment to be used for the gravel placement will include haul trucks, dozer, grader, compactor, and standard size pickup trucks.

2. BRM Installation and Related Facilities

- Install approximately 75 piles in the new gravel expansion area 1 (Figure 3) and on the existing gravel pad to support the BRM and walkway. The depth of the piles will range from 10 to 25 feet depending upon the load at the pile location.

- Construct the new BRM on the new piles.

- Construct an enclosed, elevated walkway approximately 180 feet in length on the new piles to connect the BRM to the existing building.

- Install two 12-inch diameter piles on tundra between the OT-21 pipeline and the pipe rack that goes to the flare pad to support the elevated walkway.

- Install six new power poles up to 20 inches in diameter, including three on tundra and three on the new gravel expansion area 1 (Figure 3). Install new power lines aerially between the two new sets of power poles and then buried through the new gravel pad to an existing substation. The aerial portion of the line will be approximately 160 linear feet, and the buried portion will be approximately 415 linear feet.

- The potential exists to do the power line work in conjunction with the gravel pad expansion, in which case the 3 power poles off pad will not be necessary.
- Run power, communication, and control system lines from the existing plant in a new aboveground cable tray mounted on the new BRM, walkway, and/or piles.
- Install a bullrail on pad adjacent to the new building. The power going from the new building to the bullrail will be buried in the gravel pad during installation.
- Install approximately 20 protective bollards on pad near the new BRM.
- Equipment to be used for the installation of the project components will include cranes, loaders, graders, light plants, pickup trucks, fork lifts, manlifts, trenching equipment, and temporary heaters. Storage, staging, temporary offices and break rooms will be placed on existing gravel pads or the new gravel pad.

3. Ice Road

- Construct an ice road, ice pads, and ice ramps during winter 2017 – 2018 to allow access to the existing power pole, new power poles, and trenching to the existing substation.
- The ice road will be approximately 0.6 miles long and approximately 35 feet wide, with trenching and pole installation locations to be approximately 50 feet wide.
- An alternative ice road location may be used as shown in Figure 2A.
- Less than approximately 0.9 million gallons of water is expected to be needed for the ice road or alternative ice road.
- Water will come from BPXA permitted sources and will be accessed by existing gravel roads.
- Equipment used to construct the ice road will be water trucks, Maxi-Hauls, a road grader and loader.

All work would be performed in accordance with the enclosed plan (figures 1-5), dated August 2016.

ADDITIONAL INFORMATION : The applicant has indicated separate permits will be needed from the North Slope Borough and the Alaska Department of Natural Resources Department of Oil and Gas.

APPLICANT PROPOSED MITIGATION: The applicant proposes the following mitigation measures to avoid, minimize, and compensate for impacts to waters of the United States from activities involving discharges of dredged or fill material.

a. Avoidance: A blast resistant module (BRM) is necessary to provide a safe location for workers to perform non-operational tasks at GC2. BP Exploration Alaska (BPXA) has reviewed several options to avoid impacts to wetlands while constructing a BRM at GC2. First, the north/northeast and western portions of the pad were evaluated to accommodate the BRM on the existing pad. Placement of the BRM in this area is not possible based on BP facility siting standards due to proximity of the area to the blast sources (existing turbine/compressor modules). Second, two BRM siting locations on the southern edge of the pad were determined to not be appropriate due to the significant distance of these locations from the current control room and shop (personnel would have to walk approximately ¼ mile from the new BRM to their work site at the shop). These two sites are located on the back side of the pad, with no adjacent access off the pad in case of an emergency. This would make evacuation of the BRM during a process safety event at the plant difficult and possibly dangerous, and may require emergency vehicles to enter unsafe areas in order to respond to an incident. Lastly, the walkway to connect the BRM to the plant from either of the southern locations would block access to the back side of the plant for large heavy equipment such as cranes and other maintenance equipment. For these reasons, the northern and southern on-pad sites above were dismissed from consideration. In summary, taking into consideration the purpose and need for the project, avoidance of all wetlands was not practicable.

b. Minimization: BPXA extensively reviewed all options for BRM siting at GC2 in order to minimize impacts to wetlands to the greatest extent practicable. The BRM is designed to consolidate existing break rooms, meeting rooms, and work stations that are currently scattered throughout the facility. The layout of the work spaces within the BRM was designed to utilize the smallest area possible while still accommodating the needs for the facility operation. Multiple pad layouts and options were studied, and the design with the smallest footprint that still meets the purpose and need was selected. The pad footprint was reoriented to avoid filling in a small tundra pond and to change the location of vehicle turning on pad. The building location on the pad was shifted as close to the existing pipeline as possible to minimize overall pad size while remaining outside the safe explosion/thermal hazard contours. By making these changes, the pad size was reduced by about 20%. The pad expansion in Area 1 (see Figure 3 of permit application) was designed to the minimum size for the building, associated parking, access for maintenance equipment such as water and wastewater pump trucks, and to provide access for fire suppression equipment. Area 2 (see Figure 3 of permit application) pad expansion includes filling out from the shoulder of the existing pad in order to provide better access to the new building site from the pad entrance road, and to provide minimum adequate clearance between the traffic lane and the electrical substation adjacent to the road. In summary, taking into consideration the purpose and need for the project, BPXA has designed the necessary pad expansions to minimize impacts to wetlands to the extent practicable.

c. **Compensatory Mitigation:** BPXA has avoided and minimized, to the extent practicable, impacts to wetlands at GC2. Additional avoidance or minimization is not practicable to meet the purpose and need for the project. Currently there are no third party mitigation instruments available within the service area to purchase credits. Other permittee responsible compensatory mitigation opportunities are not appropriate or practicable for the minor impacts to Waters of the U. S. in areas where wetlands are extremely prevalent. Therefore BPXA proposes that no compensatory mitigation be required for this project.

WATER QUALITY CERTIFICATION: A permit for the described work will not be issued until a certification or waiver of certification, as required under Section 401 of the Clean Water Act (Public Law 95-217), has been received from the Alaska Department of Environmental Conservation.

CULTURAL RESOURCES: The latest published version of the Alaska Heritage Resources Survey (AHRs) has been consulted for the presence or absence of historic properties, including those listed in or eligible for inclusion in the National Register of Historic Places. There are no listed or eligible properties in the vicinity of the worksite. Consultation of the AHRs constitutes the extent of cultural resource investigations by the District Commander at this time, and he is otherwise unaware of the presence of such resources. This application is being coordinated with the State Historic Preservation Office (SHPO). Any comments SHPO may have concerning presently unknown archeological or historic data that may be lost or destroyed by work under the requested permit will be considered in our final assessment of the described work. The requested permit will be considered in our final assessment of the described work.

ENDANGERED SPECIES: We have determined the described activity may affect the spectacled eider (*Polysticta stelleri*), the Steller's eider, (*Polysticta stelleri*) and the Polar bear (*Ursus maritimus*) and/or associated habitat. We will initiate the appropriate consultation procedures under section 7 of the Endangered Species Act with the U.S. Fish and Wildlife Service. Any comments they may have concerning endangered or threatened wildlife or plants or their critical habitat will be considered in our final assessment of the described work.

ESSENTIAL FISH HABITAT: The Magnuson-Stevens Fishery Conservation and Management Act, as amended by the Sustainable Fisheries Act of 1996, requires all Federal agencies to consult with the NMFS on all actions, or proposed actions, permitted, funded, or undertaken by the agency, that may adversely affect Essential Fish Habitat (EFH). No EFH species are known to use the project area.

TRIBAL CONSULTATION: The Alaska District fully supports tribal self-governance and government-to-government relations between Federally recognized Tribes and the Federal government. Tribes with protected rights or resources that could be significantly affected by a proposed Federal action (e.g., a permit decision) have the right to consult with the Alaska District on a government-to-government basis. Views of each Tribe regarding protected rights and resources will be accorded due consideration in this process. This Public Notice serves

as notification to the Tribes within the area potentially affected by the proposed work and invites their participation in the Federal decision-making process regarding the protected Tribal right or resource. Consultation may be initiated by the affected Tribe upon written request to the District Commander during the public comment period.

PUBLIC HEARING: Any person may request, in writing, within the comment period specified in this notice, that a public hearing be held to consider this application. Requests for public hearings shall state, with particularity, reasons for holding a public hearing.

EVALUATION: The decision whether to issue a permit will be based on an evaluation of the probable impacts, including cumulative impacts of the proposed activity and its intended use on the public interest. Evaluation of the probable impacts, which the proposed activity may have on the public interest, requires a careful weighing of all the factors that become relevant in each particular case. The benefits, which reasonably may be expected to accrue from the proposal, must be balanced against its reasonably foreseeable detriments. The outcome of the general balancing process would determine whether to authorize a proposal, and if so, the conditions under which it will be allowed to occur. The decision should reflect the national concern for both protection and utilization of important resources. All factors, which may be relevant to the proposal, must be considered including the cumulative effects thereof. Among those are conservation, economics, aesthetics, general environmental concerns, wetlands, cultural values, fish and wildlife values, flood hazards, floodplain values, land use, navigation, shore erosion and accretion, recreation, water supply and conservation, water quality, energy needs, safety, food and fiber production, mineral needs, considerations of property ownership, and, in general, the needs and welfare of the people. For activities involving 404 discharges, a permit will be denied if the discharge that would be authorized by such permit would not comply with the Environmental Protection Agency's 404(b)(1) guidelines. Subject to the preceding sentence and any other applicable guidelines or criteria (see Sections 320.2 and 320.3), a permit will be granted unless the District Commander determines that it would be contrary to the public interest.

The Corps of Engineers is soliciting comments from the public; Federal, State, and local agencies and officials; Indian Tribes; and other interested parties in order to consider and evaluate the impacts of this proposed activity. Any comments received will be considered by the Corps of Engineers to determine whether to issue, modify, condition or deny a permit for this proposal. To make this decision, comments are used to assess impacts on endangered species, historic properties, water quality, general environmental effects, and the other public interest factors listed above. Comments are used in the preparation of an Environmental Assessment and/or an Environmental Impact Statement pursuant to the National Environmental Policy Act. Comments are also used to determine the need for a public hearing and to determine the overall public interest of the proposed activity.

AUTHORITY: This permit will be issued or denied under the following authorities:

(X) Discharge dredged or fill material into waters of the United States – Section 404 Clean Water Act (33 U.S.C. 1344). Therefore, our public interest review will consider the guidelines set forth under Section 404(b) of the Clean Water Act (40 CFR 230).

Project drawings and a Notice of Application for State Water Quality Certification are enclosed with this Public Notice.

District Commander
U.S. Army, Corps of Engineers

Enclosures

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION
DIVISION OF WATER
401 Certification Program
Non-Point Source Water Pollution Control Program

ANCHORAGE

DEPARTMENT OF ENVIRONMENTAL CONSERVATION
WQM/401 CERTIFICATION
555 CORDOVA STREET
ANCHORAGE, ALASKA 99501-2617
PHONE: (907) 269-7564/FAX: (907) 334-2415

NOTICE OF APPLICATION FOR STATE WATER QUALITY CERTIFICATION

Any applicant for a federal license or permit to conduct an activity that might result in a discharge into navigable waters, in accordance with Section 401 of the Clean Water Act of 1977 (PL95-217), also must apply for and obtain certification from the Alaska Department of Environmental Conservation that the discharge will comply with the Clean Water Act, the Alaska Water Quality Standards, and other applicable State laws. By agreement between the U.S. Army Corps of Engineers and the Department of Environmental Conservation, application for a Department of the Army permit to discharge dredged or fill material into navigable waters under Section 404 of the Clean Water Act also may serve as application for State Water Quality Certification.

Notice is hereby given that the application for a Department of the Army Permit described in the Corps of Engineers' Public Notice No. **POA-2016-483, Beaufort Sea** serves as application for State Water Quality Certification from the Department of Environmental Conservation.

After reviewing the application, the Department may certify there is reasonable assurance the activity, and any discharge that might result, will comply with the Clean Water Act, the Alaska Water Quality Standards, and other applicable State laws. The Department also may deny or waive certification.

Any person desiring to comment on the project, with respect to Water Quality Certification, may submit written comments to the address above by the expiration date of the Corps of Engineer's Public Notice.