

**ALASKA WILDERNESS LEAGUE, CENTER FOR BIOLOGICAL DIVERSITY,
DEFENDERS OF WILDLIFE, EARTHJUSTICE, FRIENDS OF ALASKA NATIONAL
WILDLIFE REFUGES, GWICH'IN STEERING COMMITTEE, NATIONAL
AUDUBON SOCIETY, NATIONAL WILDLIFE REFUGE ASSOCIATION, NATURAL
RESOURCES DEFENSE COUNCIL, NORTHERN ALASKA ENVIRONMENTAL
CENTER, SIERRA CLUB, THE WILDERNESS SOCIETY, TRUSTEES FOR ALASKA**

October 15, 2018

Submitted via email & hand delivery

Shelly Jones
Acting District Manager
Arctic Field Office
Bureau of Land Management
222 University Ave.
Fairbanks, AK 99709
blm_ak_coastal_plain_seismic_ea@blm.gov

***Re: SAExploration's Proposal to Conduct Seismic Exploration on the Coastal Plain of
the Arctic Refuge (File No. FF097424)***

Dear Ms. Jones:

On behalf of the above-listed organizations, we are writing to express our deep concerns with how the Bureau of Land Management ("BLM") is proceeding with SAExploration, Inc.'s ("SAE") proposal to conduct seismic exploration on the Coastal Plain of the Arctic National Wildlife Refuge. The rushed and non-transparent process BLM has followed in its evaluation of SAE's proposal is unacceptable.

BLM has continued to move forward with processing SAE's application without any apparent legal authority,¹ without preparing a full Environmental Impact Statement ("EIS") as required by the National Environmental Policy Act ("NEPA"), and without any clarity on opportunities for public engagement. BLM has made multiple, conflicting statements to date about whether it will allow the public to weigh in on the draft Environmental Assessment ("EA").² Our organizations have repeatedly reached out to BLM, but BLM staff have either not returned calls or have been

¹ BLM has still not publicly identified any source of authority for permitting pre-leasing seismic exploration anywhere in the Coastal Plain, nor is any such authority apparent.

² See, e.g., Dermot Cole, *In a Rush to Launch Arctic Refuge Drilling, Trump Officials Are Ignoring Concerns About Seismic Testing*, ARCTIC TODAY, Aug. 27, 2018; Margaret Kriz Hobson, *Greens Decry BLM's Speed in ANWR Seismic Testing*, E&E NEWS, Aug. 24, 2018; Dino Grandoni, *The Energy 202: Trump Administration Moves Forward with Arctic Oil Plan Wildlife Officials Deem 'Not Adequate,'* WASHINGTON POST, Aug. 21, 2018; Shady Grove Oliver, *ANWR May See Seismic Surveys Ahead of Lease Sale*, THE ARCTIC SOUNDER, Aug. 5, 2018; Henry Fountain, *See the Scars That Oil Exploration Cut Across Alaska's Wilderness*, N.Y. TIMES, Aug. 3, 2018; Liz Ruskin, *BLM Projects 'Insignificant' Impact from Seismic Work in ANWR*, ALASKA PUBLIC MEDIA, July 27, 2018.

unable to confirm BLM's anticipated plans. One of the fundamental purposes of NEPA is to encourage meaningful involvement and input by the public. BLM's lack of clarity has made this nearly impossible. This is particularly egregious given the importance of the Coastal Plain to the Gwich'in People, and BLM's obligation to engage them in decisions that will affect their subsistence and cultural practices. It is critical that BLM provide an opportunity for the public to review any NEPA analysis prior to BLM making a decision.

The studies and documents we are attaching here show unequivocally that seismic exploration of the Coastal Plain demands careful, unrushed consideration, including a substantial public comment period. These documents indicate seismic activities are likely to have serious, long-term impacts to a wide range of resources on the Coastal Plain, including sensitive tundra and other vegetation, permafrost, water resources, threatened polar bears, caribou, fish, birds, subsistence and cultural resources, and more. Additionally, SAE itself is in a precarious financial position, impacting its ability to prevent or remediate resource damage that would occur as a result of its planned activities.³ BLM must take all of this into account in making its decision regarding SAE's application. The 200+ studies and documents we are attaching here show unequivocally that seismic exploration of the Coastal Plain demands careful, unrushed consideration, including a substantial public comment period. There can be no legitimate question that the potential impacts from this seismic proposal are significant and should be considered in an EIS.

Consideration of these and related studies, and the input from a proper public comment period will, we are confident, support our staunch opposition to any oil and gas activities, including seismic exploration, on the Coastal Plain of the Arctic National Wildlife Refuge. The Arctic Refuge is the crown jewel of the National Wildlife Refuge System and the Coastal Plain is the biological heart of the Refuge. These unparalleled public lands, and the people and wildlife that depend on them, are an international treasure that must be protected for future generations. The Arctic Refuge deserves far more than a reckless and rushed decision making process.

Thank you for your consideration, and we look forward to participating in the formal comment period.

Sincerely,

Adam Kolton, Executive Director
Alaska Wilderness League

Miyoko Sakashita, Senior Counsel
Center for Biological Diversity

Mark Salvo, Vice President, Landscape Conservation
Defenders of Wildlife

³ Press Release, SAExploration, SAExploration Announces Second Quarter 2018 Unaudited Consolidated Financial Results (Aug. 8, 2018), *available at* <http://investors.saexploration.com/node/10416/pdf>.

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