

2012-2013 SUBSISTENCE PLAN
ConocoPhillips Alaska, Inc.
National Petroleum Reserve – Alaska (NPR-A)
September 2012

This Subsistence Plan was developed to comply with Required Operating Procedure (ROP) H-1 issued as part of the 2008 Northeast National Petroleum Reserve – Alaska (NPR-A) Supplemental Integrated Activity Plan (IAP) and Environmental Impact Statement (EIS). The objective of ROP H-1 is to “provide opportunities for participation in planning and decision making to prevent unreasonable conflicts between subsistence uses and oil and gas related activities.” ROP H-1 (c) requires the lessee to prepare a subsistence plan which fulfills the objective of the requirement.

In accordance with the above, ConocoPhillips Alaska, Inc. (CPAI) hereby submits this Subsistence Plan to the AO [BLM Authorized Officer] responsible for surface activities (and/or his designated representative), the Kuukpik Corporation, the Inupiat Community of the Arctic Slope, Native Village of Nuiqsut and the NPR-A Subsistence Advisory Panel (SAP). CPAI will also consult with the NSB Planning Commission and the Kuukpik Subsistence Oversight Panel (KSOP) regarding proposed operations and potential subsistence issues that may arise.

The following actions will be performed to comply with ROP H-1:

1. Detailed Description of the Activities to Take Place (including the use of aircraft)

CPAI proposes to drill two exploration wells at the Cassin #1 and Cassin #6 exploration sites in the NPR-A southeast of Teshekpuk Lake, in the Bear Tooth Unit. Five plug and abandonments (P&As) are planned at Scout 1, Carbon 1, Spark 1A, Lookout 1, and Moose Tooth C, which are all in the Greater Moose's Tooth Unit except Scout 1 which is in the Bear Tooth Unit. One or two wells will be drilled during the 2012/2013 winter drilling season. No aircraft use is planned for winter ice road activities. Helicopters will be used during the summer as part of the final clean-up activities.

2. Description of How Lessee/Permittee will Minimize and/or Deal With Potential Impacts Identified by the AO During the Consultation Process

CPAI will communicate directly with the impacted subsistence communities, the NSB, the BLM SAP and the KSOP. Due to its history of working in both the Colville Delta and NPR-A area, CPAI has developed, jointly with Nuiqsut, processes and procedures to minimize potential impacts to subsistence activities

and install a method of communication during our operations to address potential impacts and concerns as they arise. These standard operating practices have been incorporated into the project planning.

In addition, for the 2012-2013 NPR-A exploration season, CPAI held a community meeting with the village of Nuiqsut prior to submission of this Subsistence Plan. CPAI has also consulted with the KSOP, ICAS, the Native Village of Barrow and the Kuukpik Corporation. Any potential impacts to subsistence and agreed upon mitigation activities identified during these meetings have been incorporated into this plan.

If the AO, during the consultation process, identifies any potential impacts not addressed by this plan, CPAI will meet jointly with the AO and the concerned community to identify potential mitigation measures to minimize impacts.

3. Detailed Description of the Monitoring Effort to Take Place, Including Process, Procedures, Personnel Involved and Points of Contact

CPAI has developed a process to ensure NPR-A activities are monitored using a combination of local Subsistence Representatives and Ice Road Monitors from Nuiqsut, the nearest community to the 2012-2013 activities, which work closely with the CPAI Single Point of Contact and the Winter Activities Coordinator. A detail description of these positions is provided below:

Subsistence Representative (SR) – For development and exploration work in at Alpine and in the Colville Delta area of NPR-A, CPAI has a contract in place to employ individuals to serve as subsistence representatives. CPAI proposes to hire two SRs for this work. An overview of the SR position is attached for reference.

The SR is the North Slope residents' representative in the field. This position's primary duties are to observe CPAI and CPAI contractor activities, provide recommendations on improvements to operational matters, and notify personnel on sensitive operating areas or other features in such areas that may not be known to CPAI and its contractors (e.g. grave sites, traps, etc.). The SR positions are expected to report any potential or current threats to subsistence activities observed in the field resulting from CPAI exploration, development, or production activities in the NPR-A to the appropriate parties. The SR is expected to maintain a log of activities as requested by CPAI or KSOP representatives. Additionally, the SRs may be requested to participate in meetings held in Nuiqsut (or other places in Alaska) regarding CPAI's NPR-A activities. SRs for CPAI's NPR-A exploration drilling activities will be identified prior to the start of ice road construction.

Ice Road Monitors (IRM) – CPAI plans to construct an ice road up to the NPR-A from the Alpine re-supply ice road which begins at Kuparuk Drillsite 2L. CPAI

proposes to hire two IRMs for monitoring the ice road in the Alpine area. The IRMs will be expected to clean up drips of fluids from vehicles, trash, and other debris found on CPAI's NPR-A ice roads. With respect to the exploration drilling in NPR-A, the IRM position will combine with the onsite SR position at the drill site to monitor the local ice roads near the exploration drill site.

The IRMs will patrol the ice roads in a truck (or other similar vehicle) equipped with basic spill cleanup tools and supplies (e.g. items such as absorbent pads, bags to contain oiled snow/ice, shovels, picks, etc.) as well as bags or containers for trash pickup. Upon the discovery of drips or other minor trash, they will stop and address the situation as appropriate (e.g. pick up trash, chip up small drips, repack chipped up areas with snow or ice, etc.). For situations requiring more resources than the IRMs have available with them (e.g. discovery of a large spill), they will be expected to contact the CPAI representative for assistance or guidance. The IRMs may be requested to maintain a daily log of activities documenting locations cleaned up, parked vehicles discovered without drip pans, areas of potential tundra damage, and other information as requested by the CPAI point of contact and/or the exploration drilling SR.

CPAI Point of Contact – CPAI will designate a single point of contact for monitoring and resolving NPR-A subsistence-related issues. Hazel Munoz will be the point of contact for the 2012/13 exploration season. This position will be the primary contact for the SRs to communicate with and will work with them to assist in resolution of subsistence/industry conflicts. The CPAI contact will work with designated CPAI project leaders (i.e. ice road and pad construction, drilling, etc.) to ensure that they fully understand the role of the SR and the actions needed to ensure that subsistence activities are not interfered with or otherwise adversely impacted.

If situations dictate the need for formal agreements on subsistence issues, this person will work with the SR and other appropriate parties (e.g. CPAI Anchorage based personnel) to develop and implement such agreements CPAI POC will summarize activity in change out notes and record when CPAI was informed about a subsistence-related issue, the resolution method recommended, and whether the issue was satisfactorily resolved. CPAI will collaborate with KSOP and record public input to produce bi-annual report.

In addition, the CPAI Point of Contact is responsible to provide information to Nuiqsut residents regarding CPAI winter operational activities as requested, and act as a focal point for Nuiqsut residents to learn about, comment on, or expresses concerns with CPAI's NPR-A activities. The CPAI Point of Contact is expected to disseminate information regarding CPAI's NPR-A activities to Nuiqsut residents by electronic -mail distribution, verbal updates and other forms of communication.

Winter Activities Coordinator (WAC) –CPAI will employ a full-time Environmental Field Coordinator with the primary responsibility to support NPR-A exploration activity. This position will be based out of the Kuparuk camp and serve as CPAI point of contact for the SRs and the IRMs when the CPAI Point of Contact is off the slope.

The WAC will maintain notes documenting activities performed, information received from the SR, input received from Nuiqsut residents, and other similar information. These notes will be maintained on a daily basis or as appropriate for the level of activity, and be available for review by the SR and CPAI representatives.

Issue Resolution – For each report of potential or current threats to subsistence activities as discussed above in the SR position overview, the SR will gather as much information as possible as to the specifics of the activities and threats. For issues that can easily be solved (e.g. a rolligon is about to encounter a previously unidentified gravesite) the SR will have the authority to direct changes in those activities (e.g. direct the crew to not disturb and operate around the gravesite). For issues that can be resolved by CPAI with assistance from the WAC and/or SR (e.g. debris found along ice road), CPAI will consult with these individuals to develop and implement a satisfactory solution (e.g. provide IRMs with location of debris for pickup or arrange for prompt pickup of debris by others). For more complex issues, the SR will consult with CPAI, the WAC (as appropriate), and other experts as required by each specific issue. Issue resolution for complex issues will be agreed to by CPAI, the AO, and, if applicable, the Subsistence Advisory Panel. If no resolution can be reached amongst the appropriate parties, CPAI will consult with the AO to determine the appropriate action or remedy.

Helicopter Communication Process – For activities such as summer studies and summer field inspections requiring helicopter use, CPAI will use its *General Aircraft Operations-Communication to Local Residents* [**HSE085 – SUP/DIS**] operating procedure to communicate with Nuiqsut and KSOP to minimize the disturbance to subsistence hunting activities. This procedure is attached for reference.

4. Communication Elements to Keep Potentially Affected Individuals and Communities Informed on Progress of the Activities

On August 16, 2012 CPAI held a public meeting in Nuiqsut, the most potentially affected community to the 2012-2013 operations. Notes from this meeting are attached. In addition, a meeting was held in Barrow September 13, 2012 with the NSB Planning Department and while we were in Barrow we met with ICAS and the Native Village of Barrow. CPAI will present to the NSB Planning

Commission at a public meeting in Wainwright on September 27, 2012. The Native Village of Atkasuk will also be contacted and provided a copy of this Subsistence Plan.

In these meetings, residents will be asked if they have observed any effects of CPAI's NPR-A activities on subsistence. Any subsistence effects reported either by contacts with the SR or identified in public meetings will be evaluated as discussed under Issue Resolution, above. If subsistence is found to be adversely affected by CPAI activities, an appropriate monitoring plan will be developed and implemented in consultation with the AO, the Subsistence Advisory Panel, and other potentially affected parties.

During operations, the CPAI POC and WAC will be providing periodic updates to residents of Nuiqsut through informal meetings and other communication methods. The SR and IRMs are also responsible for providing periodic updates to village residents.

5. Procedures Necessary to Facilitate Access by Subsistence Users to Conduct their Activities

During the winter of 2012-2013, the residents and subsistence hunters of Nuiqsut will have access to CPAI's ice roads.

National Petroleum Reserve – Alaska (NPR-A)
ConocoPhillips Alaska, Inc. (CPAI)
2012-2013 Subsistence Representative (SR) Position Overview

Exploration Drilling Subsistence Representative

Background of Individual: The exploration drilling SR is to be a resident of the City of Nuiqsut or Barrow and be fluent in Inupiat and in English. The SR must have an Alaskan driver's license. The individual must also be fairly well known in Nuiqsut/Barrow and, to a lesser degree, other North Slope communities, and must be generally familiar with the types of subsistence activities that would occur in the NPR-A during the winter season and the probable locations for such activities.

Job Scope: The SR position is currently envisioned to be a full time seasonal position requiring up to 84 hours/week (i.e. up to 12 hours/day, 7 days/week) during the winter operating season (i.e. from about early January, through about mid May). More than one SR may be needed for a portion of the winter operating season due to the level of CPAI's activities in the NPR-A during the winter operating season. The SR work schedules may be adjusted by CPAI and the employer during the winter operating season as necessary. The SR may also be involved with summer activities conducted by CPAI. Summer work schedules will be variable on an "as-needed" basis as determined by CPAI.

Employer: To ensure that the SR can operate independently, the exploration drilling SR will be an employee of either the Kuukpik Corporation, LCMF or of the Inupiat Community of the Arctic Slope (ICAS).

Wages: The SR wages, which are expected to be typical for similar jobs on the North Slope, will be determined by the Kuukpik Corporation and/or ICAS. CPAI will compensate the Kuukpik Corporation and/or ICAS for normal expenses (e.g. wages, payroll burden, etc.)

Expectations: The SR will be expected to travel to CPAI's NPR-A exploration drilling locations on a periodic basis or, for the Barrow-based SRs, live at the exploration drilling camp (Noatak for 12/13 season). The SR will be expected to observe ongoing activities and to identify any potential concerns with current or future operations. For exploration drilling operations conducted within 50 miles of Nuiqsut, the SR will be expected to work with the local leaders to keep them aware of CPAI's field activities. For exploration operations conducted greater than 50 miles from Nuiqsut (i.e the Noatak drilling operations), the SR will be expected to keep KSOP and ICAS aware of the issues. The SR will also be expected to provide reports of potential subsistence issues observed in the field to the WAC/village liaison, ICAS and CPAI. The SR will be expected to have, at a minimum, weekly (telephone or personal) contact with CPAI's point of contact and have more frequent contact with the WAC and/or ICAS. The Barrow-based SR will also keep the rig supervisor informed of any issues.

Subsistence Monitoring Logbook: Any subsistence-related issues reported by North Slope residents to the SR will be documented in a logbook that will be maintained by the SR. Documentation will include the name and telephone number of the resident, the date of the report, the subject reported, the resolution, and suggestions for monitoring, if appropriate. The documentation will also include suggested actions to be employed to prevent the issue from recurring in the future. A copy of the pertinent portions of the logbook will be provided to CPAI prior to submittal of the biannual reports.

CPAI Cassin Exploration KSOP Meeting

Date: August 16, 2012

Attendees: ConocoPhillips: Lynn DeGeorge, David Remier, Hazel Munoz, Sam Widmer, KSOP: George Sielak, Eli Nukapigak, Duane Hopson, Sam Kunaknana, Bruce Nukapigak, and Elizabeth Ipalook

Location: Nuiqsut

I. Cassin Exploration

- An overview of the Cassin project was discussed by presenting a wall map to the group which outlined the project.
- KSOP suggested having a subsistence representative near Kuparuk at the beginning of the Rolligon Route.
- KSOP would like the subsistence representatives to be from Nuiqsut. This needs to be worked between KSOP & Kuukpik.
- KSOP asked where the rig would be crossing. The rig will be crossing at the regular Colville River crossing and will not use the rolligon route.
- KSOP was concerned that fish would be harmed from over with drawling water from the lakes. ConocoPhillips explained that fish surveys are done on each lake to ensure adequate water is left in the lakes to support the fish and fish screens are used to protect the fish.
- In the future KSOP would like students from the community to participate in ConocoPhillips environmental studies programs in the summers.
- KSOP suggested ice road access needs to be controlled and suggested the North Slope Borough needs to control access to the ice road in Barrow. ConocoPhillips can only control who comes on the ice road from the ice road access at Kuparuk.
- KSOP asked if ConocoPhillips would put signs up labeling the ice road. Signs will be placed along the ice road to ensure people traveling the ice road will not get lost.

CPAI Cassin Exploration Nuiqsut Meeting

Date: August 16, 2012

Attendees: ConocoPhillips: Lynn DeGeorge, David Remier, Hazel Munoz, Sam Widmer, and the City of Nuiqsut

Location: Nuiqsut

I. Cassin Exploration

- An overview of the Cassin project was presented through a PowerPoint presentation.
- One community member asked who drilled Itikillik 1. This was drilled by ARCO.
- One community member asked how you will prevent spills from vehicles and contractor vehicles. ConocoPhillips will ensure each vehicle has a duck pond for this project and ConocoPhillips contractors are required to use duck ponds under their vehicles.
- One community member asked how old the P&A wells are. Arco Spark 1A was drilled in 2000, Mooses Tooth C was drilled in 2001, and Scout 1 and Carbon 1 were drilled in 2004.
- One community member asked what procedures ConocoPhillips has to prevent spills. David Reimer explained the spill prevention procedures for ice roads and a slide was added into the Cassin PowerPoint presentation to address this question in the future.