



November 14, 2017

U.S. Army Corps of Engineers
Regulatory Division CEPOA-RD
Attn: Ellen Lyons
Post Office Box 6898
JBER, AK 99506-0898

Re: ASRC Comments for Nanushuk Project Draft EIS

**Submitted via email to: ellen.h.lyons@usace.army.mil and
Nanushuk_Project@usace.army.mil**

Dear Ms. Lyons:

As the regional Alaska Native Corporation for the North Slope and a significant mineral owner of the Nanushuk Project, ASRC has concerns that the changing ownership of the Nanushuk Project to include Oil Search, Ltd., a company based in Australia and Papua New Guinea with no North Slope or Arctic experience, may result in changes in the development plan for Nanushuk and subsequently the DEIS. ASRC recognizes that Nanushuk is an important opportunity for the North Slope and State of Alaska; however, given the recent changes in ownership and lack of information about the future of the Nanushuk Project, we respectfully request that USACE extend the comment period to allow valuable stakeholders like ASRC and Kuukpik Corporation to gain a clearer understanding of the future of this project and any changes in the plan of development.

ASRC is a mineral owner of a large portion of the Nanushuk Project area and therefore has an economic interest in seeing this project developed. We continue to balance the need for Arctic oil and gas development for the North Slope's economic well-being with the subsistence culture of our Iñupiat shareholders. In general, ASRC is supportive of safe and environmentally responsible resource development because of the benefits it provides to our shareholders. We maintain that development of Alaska's resources can proceed safely, while protecting the Arctic environment and subsistence culture of its Alaska Native population. Timely and responsible development of oil and gas resources in Alaska is integral to U.S. energy policy, continued operation of the Trans-Alaska Pipeline System, and the Alaska economy that supports our Alaska Native shareholders. The Nanushuk Project fits within this framework. However, given the large scale of this project, the recent change in ownership, the potential impacts identified in the DEIS, and the significant differences between the alternatives analyzed by the USACE, we feel more time is necessary for Repsol, Armstrong, and Oil Search to work with stakeholders like North Slope Borough, ASRC, and Kuukpik Corporation on the future of Nanushuk.

It is clear in Repsol and Armstrong's Proposed Plan that they recognize the need to collaborate with the local peoples if the project is to be successful and to incorporate valuable traditional

knowledge and local considerations into the development plan. Within the Environmental Evaluation Document, Repsol (and therefore Armstrong) committed to regularly interacting with the community of Nuiqsut including regular project updates and incorporation of local guidance into the development plan. Based on this commitment, ASRC feels it is appropriate for USACE to extend the comment period at least 30 days and allow for Repsol, Armstrong, and Oil Search to engage the local communities in this manner.

ASRC does intend to provide detailed comments on the DEIS for the Nanushuk Project and remain engaged on the Nanushuk Project because of its potential impacts to our shareholder and region, both positive and negative. ASRC also recognizes USACE's efforts to ensure that oil and gas development and production on the North Slope of Alaska continues to proceed in a sustainable manner and appreciates the opportunity to comment on USACE's DEIS. However, given the recent transition in ownership, ASRC is concerned that the Nanushuk Project as currently described lacks certainty. For these reasons, ASRC recommends that USACE extend the comment period to allow these conversations to occur between local people and the operators/owners.

Sincerely,

A handwritten signature in blue ink, appearing to read "Teresa Imm".

Teresa Imm
Executive Vice President, Regional & Resource Development