



Baucum, Madonna <madonna\_baucum@fws.gov>

---

## Fwd: Proposed Information Collection; Incidental Take of Marine Mammals During Specified Oil and Gas Industry Activities; 1018-0070

Tina Campbell <tina\_campbell@fws.gov>  
To: madonna\_baucum@fws.gov

Fri, Mar 10, 2017 at 6:56 AM

Another comment.

Begin forwarded message:

**From:** "Lauck, Terry S." <[Terry.S.Lauck@conocophillips.com](mailto:Terry.S.Lauck@conocophillips.com)>  
**Date:** March 9, 2017 at 11:04:13 PM EST  
**To:** "tina\_campbell@fws.gov" <[tina\\_campbell@fws.gov](mailto:tina_campbell@fws.gov)>  
**Cc:** "McGhee, Robyn E" <[Robyn.E.McGhee@conocophillips.com](mailto:Robyn.E.McGhee@conocophillips.com)>  
**Subject: Proposed Information Collection; Incidental Take of Marine Mammals During Specified Oil and Gas Industry Activities; 1018-0070**

Dear Ms. Campbell,

Please see attached comment letter from ConocoPhillips Alaska, Inc.

Thank you.

--

---

### 4 attachments



image003.png  
5K

noname.html  
2K

20170309 CPAI - USFWS - Proposed IC 1018-0070.pdf  
467K

noname.html  
1K



**Terry S. Lauck**  
Director, Environmental & Permitting  
ConocoPhillips Alaska, Inc.  
Health, Safety & Environment  
P.O. Box 100360  
Anchorage, AK 99510-0360  
907-263-4889  
terry.s.lauck@conocophillips.com

March 9, 2017

Via e-mail: [tina\\_campbell@fws.gov](mailto:tina_campbell@fws.gov)

Information Collection Clearance Officer  
U.S. Fish and Wildlife Service  
5275 Leesburg Pike, MS: BPHC  
Falls Church, VA 22041-3803

RE: Proposed Information Collection; Incidental Take of Marine Mammals During Specified Oil and Gas Industry Activities; 1018-0070

To Whom it May Concern:

ConocoPhillips Alaska, Inc. (CPAI) appreciates the opportunity to provide comments to the U.S. Fish and Wildlife Service on the Service's proposed information collection regarding incidental take of Beaufort Sea and Chuckchi Sea populations of polar bears (*Ursus maritimus*) and Pacific walruses (*Odobenus rosmarus divergens*).

CPAI has a long history of oil and gas exploration and development in Alaska, and we presently operate the Kuparuk River Unit and Colville River Unit oilfields. We routinely apply for Letters of Authorization (LOA) for incidental "take" of polar bears and Pacific walruses that may be encountered during oil and gas operational, development, and exploratory activities on the North Slope of Alaska.

We offer the following responses to each of the Service's specific questions contained within the information collection inquiry:

Whether or not the collection of information is necessary, including whether or not the information will have practical utility:

CPAI believes the information that the Service collects is valuable input to facilitate protection of the two species. The information has helped show that responsible oil and gas exploration and development activities can and do occur without adverse impacts to marine mammal populations. CPAI employs a transparent wildlife management program for our North Slope operations, and we plan to continue to respond to reasonable information requests from the Service regarding oil and gas industry interactions with both the Polar bear and Pacific walrus.

The accuracy of the Service's estimate of the burden for this collection of information:

CPAI believes the Service's estimated burden hours for the various information collection activities to be reasonable for routine matters. Effort does vary between LOA holders due to the location, complexity of operations, and the level of polar bear and Pacific walrus activity within a LOA holder's area of interest. In some cases, time expended on a particular matter may far exceed the general estimates provided.

Ways to enhance the quality, utility, and clarity of the information to be collected:

CPAI maintains that the extent of information collection currently required is not overly burdensome given the regulations and the Service's mandate to manage these two species. Moreover, we believe that any increase in requested information could become overly burdensome to field compliance staff with no additional benefit to the management of the two species.

Ways to minimize the burden of the collection of information on respondents:

CPAI does not have any proposed ways to minimize the burden of information collection to offer. As noted above, we believe the current reporting requirements are not overly burdensome.

We appreciate the opportunity to comment on this information collection inquiry. If you have any questions, please contact me at 907-263-4889.

Sincerely,



Terry S. Lauck  
Director, Environmental and Permitting