



BP Exploration (Alaska) Inc.
900 East Benson Boulevard
P.O. Box 196612
Anchorage, Alaska 99519-6612
(907) 561-5111

February 6, 2013

Marine Mammals Management Office
Attn: Deborah Pierce Williams
U.S. Fish and Wildlife Service
1011 East Tudor Road
Anchorage, Alaska 99503

Request for Letter of Authorization for the Incidental Take of Polar Bears and Pacific Walrus; and Request to Take Polar Bears by Harassment (Deterrent Activities) while conducting activities in Foggy Island Bay, Alaska.

Dear Ms. Williams,

BP Exploration (Alaska), Inc. (BPXA) is requesting a Letter of Authorization (LOA) pursuant to 50 CFR 18, Subpart J and Section 101(A)(5) of the Marine Mammal Protection Act (MMPA) for the incidental (unintentional) take of polar bears and Pacific walrus during the 2013 Geotechnical Investigation Project in Foggy Island Bay, Alaska.

In addition, we are requesting a permit pursuant to sections 101(a)(4)(A)(iii), 109(h) and 112(c) of the MMPA to take by harassment (deterrent activities) polar bears for the protection of both human life and polar bears while conducting activities related to the 2013 Geotechnical Investigation Project in Foggy Island Bay, Alaska. This LOA request is for the period of April 1 through May 31, 2013 during which time the activities associated with project are planned to occur.

In accordance with 50 CFR §18.124, BPXA prepared and submitted an updated Polar Bear and Walrus Interaction Plan in September 2012. The document, titled *Polar Bear and Walrus Interaction Plan for BPXA Areas of Operation-revised September 11, 2012*, describes the measures and practices that BPXA requires of their employees and contractors. The plan includes a Monitoring and Mitigation Plan, Plan of Cooperation, and Hazing and Deterrence Policies and Procedures. BPXA received approval of the plan from your office and we understand that you have it on file. If you would like another copy, or feel it needs any updates, please let us know.

Golder Associates, Inc. (Golder) will be the primary contractor performing the project which is expected to take approximately four weeks to complete. Approximately 40 boreholes will be drilled, at depths between 75-100 feet, to investigate permafrost suitability for a potential drill island and pipeline construction. Food and human waste will be transported to a BPXA facility for disposal at the end of each daily shift. The 2013 Geotechnical Investigation Project Description, which includes the scope of work and a map of project location is included for your review (Attachment I).

A bear watch/guard will be on site through the duration of the project. Any sightings or interactions will be communicated by the field team lead (Erin Bashaw, Golder) to the Endicott Environmental Advisor via telephone, email, or harmony radio. The BPXA Environmental Advisors will be responsible for submission of polar bear sightings reports to the USFWS. As discussed in our interaction plan, wildlife is always given the right of way. If bears are spotted in the project area, work and travel will be suspended to allow the animals to proceed undisturbed. Deterrence activities will only be conducted as a last measure to prevent escalation of an encounter and ensure safety of workers and bears. BPXA's policy dictates a progression of deterrence methods which begin with sound, lights, and movement before resorting to firearm hazing rounds.

In addition to BPXA's standard polar bear training, personnel will receive additional education in den avoidance and awareness since this project is scheduled to occur during the den emergence period.

BPXA appreciates the opportunity to work with the USFWS for the protection of marine mammals. If you have any questions or suggestions please contact me at 907-564-4941 or Mike.Brock@bp.com. Our intent is to submit this application to you only in electronic form. Please advise if you would like us to mail you a paper copy and we would be happy to accommodate you.

Sincerely,



Mike Brock
Environmental Team Lead
BPXA

cc: Mr. Craig Perham, USFWS
Mr. Christopher Putnam, USFWS

ATTACHMENT I

**2013 Geotechnical Investigation Work Plan
Foggy Island Bay, Alaska**

2013 Winter Geotechnical & Sea bottom Investigation Project Description / Plan of Operations

Introduction

BP Exploration (Alaska) Inc. (BPXA) proposes to conduct a geotechnical investigation and a visual inspection of the seabottom in support of the Liberty development.

Purpose

The purpose of the investigations is as follows:

- Provide soils information for the possible future pad locations;
- Provide soils information for evaluating the proposed pipeline routing; and
- Provide a visual inspection of the sea bottom environment.

Scope of Work

Geotechnical Investigation:

The field team will drill approximately 40 geotechnical boreholes from the sea ice to depths of approximately 100 feet below the ground surface in the vicinity of the Liberty Development to explore the subsurface conditions. Approximately five geotechnical boreholes are planned to be drilled in federal waters.

A drill specifically configured for shallow soils exploration will be used for this project. The drill will be mounted in an enclosed trailer, so that the drill and work area are protected from the weather by an enclosure. A generator and all support tools will be carried on the trailer or accompanying Rolligon. Additionally a second Rolligon will provide support and include two 500 gallon fuel tanks for fuel re-supply.

Closed PVC pipe will be placed in some boreholes and left in place when the borings is backfilled. Temporary equipment placed in the PVC pipe will be used to measure the ground temperature profile.

A roller-driven Rolligon (CATCO RD-85) will pull the enclosed drill trailer equipped with a drill within the project area. A second Rolligon will support the drilling operation by assisting drill moves, providing fuel, and act as a personnel carrier, when needed. A tucker will also be used for personnel support. The Rolligons will access the borehole locations by crossing frozen sea ice from the Endicott access road.

The field team may also utilize a conventional pumper unit (used for ice road construction and equipped with a large auger) to make holes for water to thicken the ice and construct ice pads as necessary.

Sea bottom Investigation:

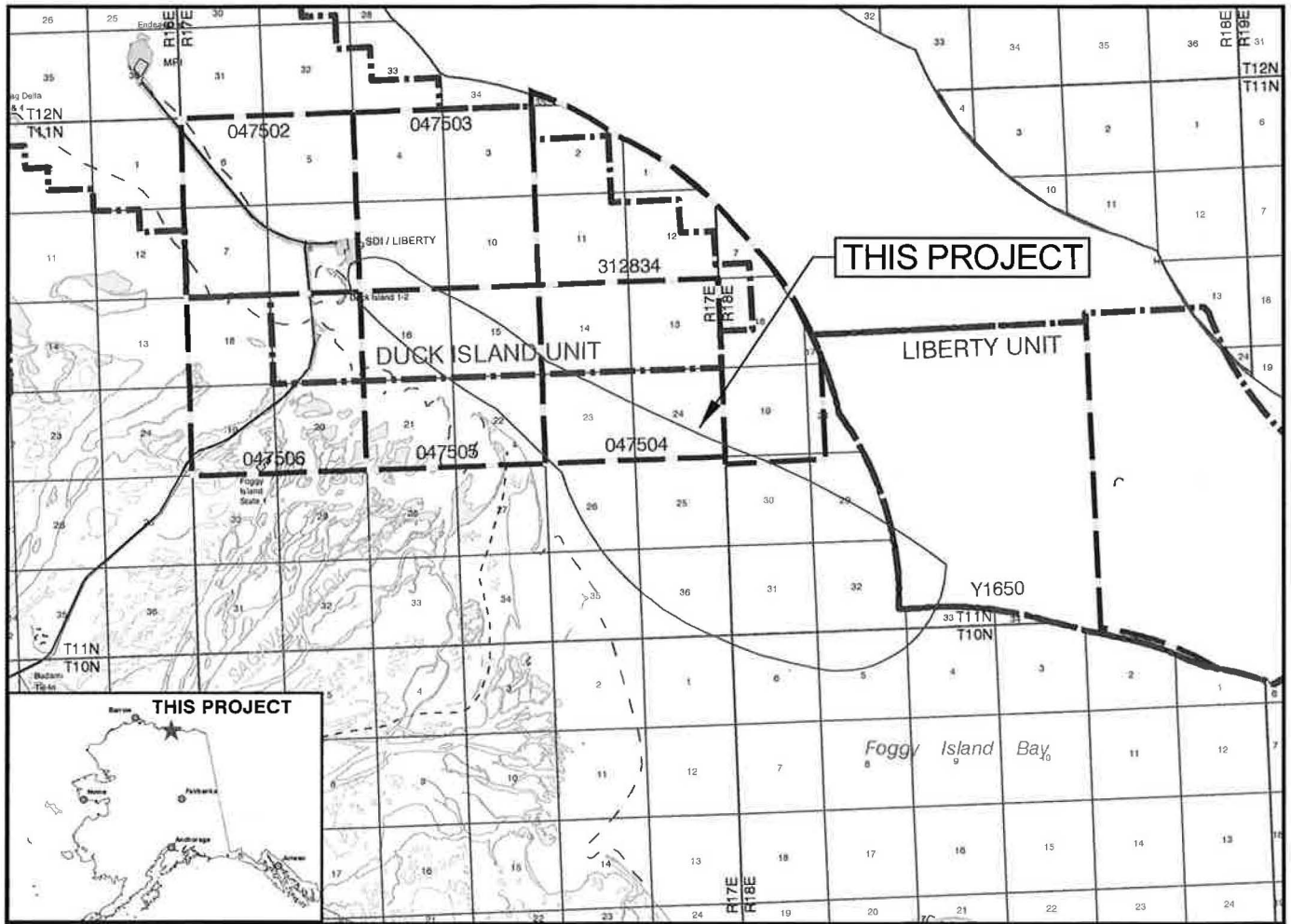
A visual inspection of the sea bottom is proposed using a remotely operated vehicle (ROV). The ROV will be tethered to the controlling unit at the surface capable of capturing video images of the seafloor.

The field team will utilize a conventional pumper unit and a Tucker vehicle to accomplish the work. The access routes and work areas will be the same as the geotechnical boring program.

Holes of sufficient size to allow entry of the ROV will be drilled into the ice by the auger-equipped pumper. The ROV will be lowered into the ice hole and will search the seafloor to define its local characteristics (e.g. featureless or rock cover with observed concentrations of biota/kelp cover). The total number of sites examined will be a function of the productivity of the work crew, but could be up to 40 locations.

3.0 Schedule

The activities will begin April 1 and will conclude prior to breakup (May 2013).



This map is based on U.S.G.S quad Beechey Point (B-1, B-2) and on the Unit Operator's Facility Maps.



PROJECT LOCATION:

DUCK ISLAND UNIT - SATELLITE DRILLING ISLAND

NAD83

LAT. = 70° 19' 18.786" / DD 70.321885

LONG. = -147° 51' 56.266" / DD -147.865629

ALASKA STATE PLANE ZONE 4, NAD83

X = 1,903,616.63 FEET

Y = 5,971,775.36 FEET

SEC. 1 T10N, R17E UMIAT M.

SEC. 4-6 T10N, R18E UMIAT M.

SEC. 8, 9, 14-17, 21-26, 35, 36 T10N, R18E UMIAT M.

SEC. 19, 29, 30-33 T11N, R18E UMIAT M.

ADL # 047502, 047503, 047504, 047505, 047506,
312834

OCS # Y1650

DATUM: MEAN SEA LEVEL

PURPOSE: GEOTECHNICAL INVESTIGATION

ADJACENT PROPERTY OWNER:
STATE OF ALASKA

BP EXPLORATION (ALASKA) INC.

**2013 FOGGY ISLAND BAY
GEOTECHNICAL INVESTIGATION
VICINITY MAP**

DATE:
February 2013

SCALE:
1" = 2 Miles

FIGURE:
1

