



Polar Bear and Walrus Interaction Plan for BPXA Areas of Operation

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Purpose

The purpose of this Polar Bear and Walrus Interaction Plan is to establish processes for managing human-polar bear and walrus interaction within BP Exploration (Alaska) Inc.'s (BPXA's) operating fields on the North Slope. The occurrence of walrus in BPXA operating areas is rare; therefore this plan focuses mainly on Polar Bear interaction guidance. The primary objective of this plan is to assure that impacts to bears and walrus and to human safety are minimized during oil field activities. It includes methods for prompt communication of bear and walrus presence in the field so that appropriate avoidance or active deterrence measures (for polar bears) by appropriate personnel may be taken.

BPXA created this Polar Bear and Walrus Interaction Plan in order to comply with the terms of U.S. Fish and Wildlife Service regulations for obtaining a Letters of Authorization (LOA) for the incidental take of polar bears and walrus and intentional take of polar bears for all BPXA operated fields in Alaska. In accordance with Endangered Species Act (ESA) Section 7, issuance of the current LOA and compliance with this document fulfill the requirement for Tier 2 Consultation of the Programmatic Biological Opinion for activities in BPXA operated fields.

BPXA's General Polar Bear Policies for Oilfield Workers

BPXA's Polar Bear and Walrus Interaction Plan is designed to minimize human/polar bear and walrus interactions, to ensure the safety of all personnel and mitigate any potential impacts to polar bear or walrus well-being or survival. The following list is a quick reference to BPXA's general interaction plan policies. Those working in polar bear or walrus habitat must be familiar with issues associated with polar bears and working safely in bear country. Personnel working in polar bear habitat must abide by the following:

- **Be aware of polar bear activity in your work area.** When Security becomes aware of a polar bear, they will notify permitting authorities and group supervisors of the presence of the bear in the area. Radio transmission may also be used to notify workers in the vicinity. If you are starting work outside in an area with the potential for polar bears, make sure you discuss with the individual issuing permits how the presence of polar bears will be communicated to you and your crew.
- **Check your work area before leaving the safety of a vehicle or building.** If a polar bear was recently sighted in or around your work area or operating unit, take additional precautions (e.g., posting a bear guard) to look for polar bears while working.
- **Handle food and dispose of food waste properly** so that you do not intentionally or unintentionally feed bears or other wildlife. Do not leave food or food waste outside. Never leave food or food waste in the bed of a truck. Never leave food or food waste inside an unattended vehicle for extended periods of time. Dispose of food and food waste in bear-proof dumpsters.
- **Do not approach, move towards or stop to photograph or record video of a polar bear or maternal polar bear den.** Photographing or videoing a polar bear or maternal polar bear den is authorized only for

those persons needing to document bear condition, behavior, and/or location for regulatory or scientific purposes. Unless authorized, anyone who deliberately stops to observe or photograph, or approaches a polar bear puts themselves and others in danger, and could incur severe penalties, up to and including termination.

- **Immediately report all polar bear sightings and/or interactions and all known or suspected maternal polar bear dens or bears associated with a maternal den to security or other designated personnel.** If a bear or den is sighted, move to a safe location and immediately notify Security. Assist Security if necessary in completing a Polar Bear Sighting Report. Also notify the on-site supervisor as soon as a bear is seen.
- **Supervisors shall notify other workers and work groups** (including other contractors) of the presence of recently sighted polar bears as necessary via radio, alarms and other methods, or via security.
- **Do not take any action to deter a polar bear's activities;** only designated and trained personnel are authorized to take any action to influence polar bear activities (i.e., haze).
- **BPXA security personnel (or ACS personnel at Northstar and Badami) are required to report all polar bear sightings and interactions to the USFWS within 24 hours.** All instances involving harassment activities are reported as soon as possible and not later than 24 hours after the occurrence.
- **BPXA security personnel will notify the USFWS of known or suspected maternal dens** or bears associated with maternal dens as soon as practicable but no longer than **12 hours** after discovery.

Background

Polar Bear Biology

Polar bears can be found anywhere on the North Slope; however, they are concentrated near the coast and are most frequently sighted near facilities, roads and pads along the shoreline (particularly at Endicott, Liberty SDI, West Dock, Northstar and Milne Point). Both single animals and females with cubs may be sighted. Although polar bears are encountered throughout the year, they are most often seen during summer, fall and winter.

Polar bears can weigh over 1,500 pounds and measure 5 feet tall at the shoulder, or 12 feet when standing on their hind legs. They are excellent swimmers and can run 25 miles per hour. Because of their size, speed, and curious nature, any encounter with these large carnivores is potentially dangerous. Recent studies show there are approximately 1,500 polar bears in the Alaskan Southern Beaufort Sea Population.

Regulatory Drivers

Polar bears are protected under the Marine Mammal Protection Act (MMPA) of 1972 and are listed as threatened under the Endangered Species Act (ESA) of 1973 as amended in 2008. In accordance with the MMPA and ESA, it is illegal to “take” polar bears. To take a polar bear or marine mammal is to:

- “Harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct” according to the ESA, or to
- “Harass, hunt, capture, or kill, or attempt to harass, hunt, capture, or kill any marine mammal” according to the MMPA.

The MMPA further defines harassment as “any act of pursuit, torment, or annoyance which (i) has the potential to injure a marine mammal or marine mammal stock in the wild [Level A harassment]; or (ii) has the potential to disturb a marine mammal or marine mammal stock in the wild by causing a disruption of behavioral patterns, including, but not limited to, migration, breathing, nursing, breeding, feeding, or sheltering but which does not have the potential to injure a marine mammal or marine mammal stock in the wild [Level B harassment].”

On the North Slope, the USFWS is the regulatory authority tasked with oversight, management and conservation of polar bears. The United States Geological Service Biological Resource Division (USGS-BRD) and the Alaska Department of Fish and Game (ADF&G) also have staff that are involved with polar bear management and research.

USFWS can authorize incidental take of marine mammals under Sections 101(a)(5)(A) and (D) of the MMPA, and can authorize intentional take of marine mammals under Sections 101 (a)(4)(A), 109(h), and 112(c) of the MMPA through issuance of Letters of Authorization (LOA).

Section 101(c) of the MMPA allows, without specific authorization, the take (including lethal take) of a polar bear if such a taking is imminently necessary in self-defense or to save the life of a person in immediate danger, and such taking is reported to USFWS within 24 hours.

BPXA Areas of Operation and Activities

BPXA operates the Greater Prudhoe Bay, Milne Point, Northstar, Badami, Duck Island and Liberty Units year round. These units are made up of several oil fields which are actively producing and processing oil and gas, while maintaining infrastructure and transportation systems to accommodate such activities.

Producing fields may also incorporate construction, maintenance projects, and additional pad development to enhance oil recovery within the unit. These processes could involve such activities as winter construction of ice pads and ice roads, construction of gravel roads and pads, need for seismic acquisition, and remediation and rehabilitation work or research that could require off-pad work.

Food and Waste Management Plan

The majority of dumpsters approved for food waste disposal in the oil fields are now bear-proof. All garbage that contains food should be bagged before being deposited into animal-proof dumpsters. The dumpsters are owned by the North Slope Borough or contractors, and are replaced periodically. The dumpsters are generally in high-visibility and high-traffic areas. Bear activity near the dumpsters should be reported to security and/or the BPXA Environmental Advisors (or ACS at Northstar and Badami) so that corrective measures can be taken before problems arise. Notify the Environmental Advisors on the Slope of dumpsters with food waste that are deformed or cannot be closed. Garbage and other food-related waste should not be left in trucks (either on the flatbed or inside the vehicle). Personnel should avoid carrying garbage or food around with them as it attracts bears.

Polar Bear and Other Animal Carcasses

Unauthorized collection, handling, possession, selling, transporting, or shipping of polar bears or their parts **is illegal** under the Endangered Species Act [FWS-R7-ES-2008-0038, May 15, 2008]. Polar bear carcasses (including bones, fur and partial carcasses) should be reported immediately following the protocol described for sightings of live bears. Carcasses **can not be collected, handled, possessed, moved or shipped** without written permission from the USFWS. Contact an Environmental Advisor for further guidance.

Although Native hunters seldom hunt whales near oil fields, oil field workers should be aware that whale carcasses frequently attract one or more polar bears. Whale carcasses can attract curious onlookers, often by invitation from Native hunters. Oil field workers should not approach whale carcasses even if a Native hunter has invited visitors.

Seal carcasses are periodically found on the beaches near the oil fields. These carcasses can also attract polar bears. Seal carcasses should be reported to BP Environmental Advisors and/or security (or ACS for Northstar and Badami) so that they can be dealt with before they become animal attractants.

Avoidance and Encounter Procedures

The main strategy for avoiding bear/human interactions is to minimize the attractiveness of work sites. The continual presence of active machinery and vehicles tends to discourage bears from approaching work sites, and vehicle operators are generally able to detect bears nearby. If a bear should remain on-site for an extended period or

if personnel are at risk, active deterrence, authorized under Sections 109(h)(1) and 112(c) of the Marine Mammal Protection Act, may be necessary. Only Security personnel or other authorized individuals are permitted to engage in active deterrence (i.e., hazing) polar bears.

The BPXA field camps and personnel can limit encounters of polar bears by being observant of approaching animals (i.e., the use of polar bear guards) and breaking off interactions, if practicable, by allowing the animals to continue their travel.

To further reduce the risk of an encounter, all personnel shall monitor radio transmissions and/or maintain open lines of communications with area operators to enable quick notification of the presence of polar bears in the work vicinity. All personnel shall check their work area before leaving the safety of a vehicle or building. If a polar bear was recently sighted in or around the work area or operating unit, personnel shall take additional precautions (e.g., posting a bear guard) to look for polar bears while working.

As part of on-going operations, Security personnel regularly patrol the road system in the BPXA operated fields. If a polar bear is sighted, Security dispatches an officer to keep track of the bear and ensure that all personnel are notified. Consideration shall be given to providing an extra guard position in high bear activity areas e.g. Endicott, during the high risk periods of Aug 1st – Oct 31st.

If workers are required to be in a remote area (or off-pad), Security should be informed; Security or other assigned personnel may accompany workers if the bear risk is believed to be high. All operations conducted during hours of darkness will be appropriately and adequately lit to see areas surrounding work location (e.g., use of light towers). Other on-going operations, such as aerial photography and pipeline inspections, will note the presence of any bears in the area and will forward that information to Security.

At the Badami and Northstar oil fields, the Onshore Site Manager (OSM) and Offshore Installation Manager (OIM) and on-site Environmental Technicians are responsible for alerting personnel to the presence of a bear; Security at either Endicott / Milne Point / Prudhoe Bay will be contacted if a bear remains in the vicinity. Security will report sightings and interactions to the USFWS, ADF&G, USGS, BPXA Environmental Advisors and the BPXA Wildlife Compliance Advisor in Anchorage.

Site At-Risk Locations and Situations

All personnel shall be aware of the layout of their work site, including the location of buildings (especially all doors), roads, dumpsters, and storage areas. For the vast majority of workers, the most heavily traveled areas are between the airports and the living quarters, and from the living quarters to the facilities. All workers are instructed to look for bears before leaving buildings; where possible, workers should exit in groups. Entrances to the camps, production facilities, and shops are to be well lit at all times.

When practicable, all personnel should have access to “safe areas” such as buildings, warm-up shacks, or vehicles. If not practicable, a bear guard authorized to haze should be present with the work crew. Personnel should be adequately briefed on polar bear activity prior to conducting work outside. Safety briefings detailing the routes to a safe location, site-specific at-risk locations, and other appropriate polar bear safety topics should be conducted on a regular basis.

Material Storage: Pipe, oil, hydraulic fluid, glycol, and many other materials are stockpiled in the oil fields. Liquids are typically stored together in 55-gallon drums, DOT-approved chemical totes, tanks, or in warehouses or on storage pads. These containers are bear-proof if intact and should be kept closed when not in use. Dry materials are typically stored in packs on pallets. Where possible, snow will be regularly removed from around the stacks of materials to minimize potential bear hiding places. In addition, exterior-stored pallets and drums will either be placed very close together or will be separated widely enough in an attempt to eliminate potential hiding places. Furthermore, most storage areas are visited throughout the day and are in well-lighted areas. Mobile light towers may be used to light project-specific storage areas. All personnel will be instructed to reconnoiter storage areas before leaving their vehicles. Wherever possible, personnel should avoid working alone in areas without a clear line-of-sight to a vehicle or other safe area. Personnel should notify Security (or ACS for Northstar and Badami) of any damage to pallets and/or drums that appears to be wildlife-related.

Snow Management: To reduce the availability of hiding places for bears, all drifting snow is to be cleared as needed or as soon as weather permits. Snow should be removed to the nearest available area adjacent to the location or to predetermined, permitted dump sites. Where practicable, large snow berms on working surfaces (potential hiding locations for bears) should be kept to a minimum. Personnel responsible for snow removal should sweep the location with their headlights before exiting their vehicles. Any sign of bears must be reported to Security (or ACS at Northstar and Badami) immediately.

Interfering with, Photographing, or Videotaping Polar Bears

Polar bears are top predators, and any encounter with them is potentially dangerous and could be life-threatening. Company policy prohibits interfering with polar bears in BP Operated Fields, except for approved scientific research, regulatory, or security reasons. Interfering with polar bears is defined as any activity that may cause a change in the bear's behavior. This policy will be strictly enforced by security personnel.

Photographing or videoing a polar bear or maternal polar bear den is authorized only for those persons needing to document bear condition, behavior, and/or location for regulatory or scientific purposes. Other persons may photograph or video a polar bear **only if** the photography can be obtained without disturbing the bear (e.g., photo taken from inside a building, through a closed window). Disturbance is defined as approaching a bear with intent to photograph, or as any activity which causes the bear to alter its behavior. Vehicles shall not be stopped in the roadway for the purposes of viewing, photographing, or videotaping polar bears. Any person disturbing or approaching a bear with intent to view, photograph or videotape polar bears in the BP operated fields is subject to severe penalties, up to and including termination.

Maternal Polar Bear Den Mitigation and Response

Pregnant female polar bears overwinter in dens dug in snow. Denning occurs on land and on ice. BPXA employees, contractors and others working in the BPXA oil fields are required to avoid known dens by one mile. In general, dens are not visible to the naked eye, so proactive monitoring procedures to locate dens in project areas are conducted each year in collaboration with the USFWS. Projects involving work that will be conducted off pads or roads and are scheduled to occur between November 15 and April 15 are mapped; and in areas where potential denning habitat is located, researchers use forward looking infrared (FLIR) to search for active dens. If a den is later discovered that was not detected using FLIR (for example, if a bear emerges from a den within one mile of a work site), all work must stop immediately and Security (or ACS for Northstar and Badami) personnel contacted. Security/ACS personnel must report all known or suspected dens to the USFWS immediately (not more than 12 hours after discovery). Work may not recommence without written clearance from the USFWS, Area Operations Manager (AOM), and the BPXA Environmental Advisors or the BPXA Wildlife Compliance Advisor.

The following protocols outline the initial response to the discovery of an active or suspected maternal polar bear den when working on ice roads/pads **operated by BPXA** or via cross country off-road travel away from existing infrastructure (e.g., facilities, causeways, roads or pads).

- 1) All workers must be vigilant for any signs of undetected dens in their vicinity. This includes any sightings of polar bears, suspected dens or tracks. If a bear, suspected den or tracks are seen within a one-mile buffer around the work or travel area (e.g., seismic activity, ice roads) or if an active polar bear den is discovered, site personnel shall contact Security personnel (or ACS for Northstar and Badami), who contact appropriate agencies and the BPXA Environmental Advisor in charge. Security/ACS personnel and the Environmental Advisor will notify the AOM, BPXA Wildlife Compliance Advisor (Anchorage), and the USFWS Marine Mammals Management office immediately (as soon as they are made aware of the den or suspected den).
- 2) For work in the BPXA operated fields, the BPXA Environmental Advisors will be the single point of contact between the USFWS and operations staff and will keep the USFWS informed about the situation via phone and email contact. If the site, project or ice road is not operated or controlled by BPXA, all BPXA staff and contractors will comply with directions given by the oilfield operating company who holds the LOA associated with the site or road (e.g., ConocoPhillips, Pioneer Natural Resources, etc.).
- 3) Upon an initial report of a bear, tracks or a suspected den, the Environmental Advisor will dispatch Security personnel (or ACS for Northstar and Badami) to try to determine if the bear is associated with an active den.

Once dispatched, Security/ACS personnel should try to determine whether the site is greater or less than one mile from the area of activity.

- 4) If a bear is observed near an off-road work site or ice road between March 1 and April 15, even if a den entrance is not seen, it will be assumed to be associated with a den until it is determined that the bear is not associated with a den. If the bear is determined to be associated with a den, the Environmental Advisors will immediately contact the USFWS and assign someone from Security to monitor the bear and immediate area.
- 5) The BPXA Environmental Advisors will communicate with other user groups, company staff and contractors about the situation and keep them informed of any developments. If the site or ice road is not operated by BPXA, all BPXA staff and contractors will comply with directions given by the company in charge of the site or road.
- 6) If an active maternal den is confirmed to be more than one mile away from the ice road or other activity, the den and bears will be monitored by Security personnel as directed by the BPXA Environmental Advisors, in consultation with the USFWS. A remote camera may be set up by USFWS personnel, or their representative, to record activity at the den site.
- 7) If an active maternal den is confirmed to be less than one mile away from the ice road or other activity, the BPXA Environmental Advisor in charge will immediately initiate a stop work or road closure under the direction of the USFWS.

In the event that an active maternal den is confirmed to be less than one mile away from a road, pad, off-site facility or ice road **not operated by BPXA**, all BPXA employees and contractors will, at minimum, abide by any regulations or closure activities as dictated by the company in charge of the road or facility.

Ice Road Closure Protocols in Response to Maternal Den Identification

The following protocol outlines how an ice road will be closed in the event that an active maternal den is confirmed to be less than one mile away from **an ice road operated by BPXA**. These protocols recognize that vehicles already on the road may still need to pass through the one-mile buffer zone to return to base camp. In the event that an active maternal den is confirmed to be less than one mile away from a road **not operated by BPXA**, all BPXA employees and contractors will, at minimum, abide by any regulations or closure activities as dictated by the oilfield operating company who holds the LOA associated with the site, road or facility.

- 1) Security check points will be positioned at either end of the road and mobile security personnel (Security Rovers) will be positioned on the road near the den site as directed by the USFWS and the Environmental Advisors, where practicable (i.e., unless weather or other safety concerns prohibit driving). The Security Rovers will advise the Security control check points on either end of the road to keep any new traffic from entering the road.
- 2) Security Rovers will monitor the suspected den 24 hours per day from a position that allows clear viewing of the den without disturbing it. A video camera may also be placed on the opposite side of the road as directed by the Environmental Advisor in charge or by USFWS personnel to simultaneously record the den site and road activity, where practicable. Security personnel will conduct the following:
 - ⇒ The Security Rovers will communicate with the guards at the traffic control points on both ends of the road.
 - ⇒ The Security Rovers will observe and log all traffic, as well as polar bear activity.
 - ⇒ The Security Rovers will immediately notify Security personnel, the Environmental Advisors and the AOM of any polar bear activity or emergence from the den.
 - ⇒ Designated Security personnel must park vehicles in an area that allows clear viewing of the den without creating a disturbance or potential obstruction to the sea ice for the polar bears under the guidance of the USFWS.
 - ⇒ At least one Security Rover will remain at the polar bear den site until the USFWS determines a bear monitor is no longer needed. For health and safety reasons, bear monitors will change shifts as necessary.

- 3) The den location will be provided to non-commercial aircraft operators contracted or chartered by the company (or companies) with instructions to fly at altitudes above 1,500 feet if passing over the one-mile buffer zone or to divert aircraft around the one-mile den buffer zone.
- 4) Vehicles on the road will be made aware of the maternal polar bear den once discovered. During this period, the following road rules will apply within a one-mile buffer of the known or suspected den:
 - ⇒ All vehicles must maintain a maximum speed of 10 mph.
 - ⇒ Horns and other loud devices may not be used.
 - ⇒ No stopping or backing up is allowed.
 - ⇒ No photographing or videotaping is allowed
 - ⇒ No road maintenance activities are allowed.
- 5) Road-closure signs and barriers will be placed at each traffic control point to prevent any unauthorized access to the road. If approved by the USFWS, essential traffic may be allowed to caravan behind a Security vehicle while the bears are in the den (e.g., at night).
- 6) If vehicles are still on the pad and are deemed essential traffic (e.g., vehicles not yet on the road but needing to return to base camp), the AOM in charge will advise the guards at the Security check points to form a caravan of vehicles needing to get on the road. This caravan of vehicles will be escorted by Security personnel designated to do so. All other personnel or equipment needing transport will use either aircraft or an alternative land route, unless specifically given permission by the AOM to do otherwise.
- 7) Any vehicle requesting limited access to the road during road closure will require explicit approval from the AOM (in consultation with the Environmental Advisor who is in contact with USFWS). Examples of limited essential traffic may include transportation of materials or personnel critical to process or personnel safety, environmental emergencies, or life-support equipment or medicines that can not access the remote site by other means.
- 8) If the ice road is shut down for an extended period and caravanning of vehicles is not approved by the USFWS, company staff and contractors will, depending on the exact site, timing and circumstances, re-route traffic, using a new ice road route, or employ tundra travel and/or airlifts to support activity at the remote location(s).
- 9) Guards at either end of the road will stop all traffic until given approval from the USFWS to re-open the road or caravan vehicles. The Environmental Advisors will communicate with the USFWS on the status of the female bear, cubs, maternal den site and any traffic at least two times per day or as needed unless the USFWS determines that it is not necessary. If a request is made to enter the road, only the AOM in charge of the ice road can allow access to the road with permission from the USFWS via the Environmental Advisors. If USFWS staff cannot be reached in an emergency situation, the AOM is the only one who can allow access, and only for the specified emergency situation
- 10) It is the responsibility of the AOM to ensure the road remains closed to all traffic and the USFWS is kept informed of the situation.
- 11) The AOM will give approval to resume road use only when the USFWS approves (in writing) reopening of the road, such as when the sow and cubs leave the den permanently.

Operational Support Vessels

The captain or a designated crew member of vessels used as part of regular oilfield operations shall maintain a watch for marine mammals during vessel operations and will alert the vessel crew of the presence of walruses and polar bears. Vessels will maintain the maximum distance possible from concentrations of walruses or polar bears. Other than an emergency or approved hazing situations, vessels will not approach within an 805-m (0.5-mi) radius of walruses or polar bears observed on land or ice. Vessel operators will take every precaution to avoid harassment of concentrations of feeding walruses when a vessel is operating near these animals. Vessels should reduce speed and maintain a minimum 805-m (0.5- mi) operational exclusion zone around feeding walrus groups. Vessels may not be

operated in such a way as to separate members of a group of walrus from other members of the group. Vessels adjust speed according to weather conditions to avoid the likelihood of contact with marine mammals.

Operating Conditions for Aircraft

Operators of support aircraft shall, at all times, conduct their activities at the maximum distance possible from concentrations of walrus or polar bears. Other than in an emergency, aircraft shall not be operated at an altitude lower than 457 m (1,500 ft) within 805 m (0.5 mi) of walrus or polar bears observed on ice or land. Helicopters may not hover or circle above such areas or within 805 m (0.5 mile) of such areas. When weather conditions do not allow a 457-m (1,500-ft) flying altitude, such as during severe storms or when cloud cover is low, aircraft may be operated below the 457-m (1,500-ft) altitude stipulated above. However, when aircraft are operated at altitudes below 457 m (1,500 ft) because of weather conditions, the operator must avoid areas of known walrus and polar bear concentrations and should take precautions to avoid flying directly over or within 805 m (0.5 mile) of these areas.

Personnel Training and Procedures

Polar bear training is required by 50 CFR §18.128(a)(1)(iii), which states that “Holders of Letters of Authorization must have an approved polar bear and/or walrus interaction plan on file with the Service and onsite, and polar bear awareness training will also be required of certain personnel”. To fulfill these requirements, BPXA provides the following three levels of training.

Level One Training is basic polar bear awareness training and is required for all unescorted personnel on the North Slope. This training is met by completing the polar bear section of the Environmental Management System (EMS) and Compliance Training module.

Level Two Training is designed for personnel who have an increased likelihood of encountering a polar bear during the course of work. The frequency of polar bear encounters can increase in coastal areas, on barrier islands, and in offshore operations, therefore workers in these areas may need Level Two training. This will include basic bear biology, habitat, and behaviors. Individuals will be made aware of methods to reduce the chances of a polar bear encounter. Training will also include sighting report procedures for the work site and emergency contact numbers within BPXA. *Contact the Wildlife Compliance Advisor (Anchorage HSSEE) to determine if your project or crew will need to have Level 2 training.*

Level Three Training is designed for personnel involved in polar bear hazing and deterrence. Only positions designated by site Security (or the area operations manager, if a Security position is not on site) typically have Level Three training. Note that seismic crews or remote exploration crews may have a polar bear hazer who is hired as a third-party contractor for the purpose of hazing wildlife. Should a non-Security member be used for hazing, that person must have hazing training that is consistent with current bear hazing training, and must be preapproved by the BPXA Wildlife Compliance Advisor.

The following additional resources address issues associated with working in polar bear habitat and can be obtained by contacting a BPXA Environmental Advisors or the Wildlife Compliance Advisor.

- North Slope Environmental Field Handbook (available through NSTC Training, North Slope Environmental Advisors).
- Polar Bear Awareness DVDs – available from the AK HSSEE Environmental Advisors.
- The Polar Bear Interaction Plan (this document), should be available on site at all times to BPXA personnel, contractors and crew members working on behalf of BPXA.
- Additional training materials, such as project-specific presentations, which can be requested by calling the BPXA Wildlife Compliance Advisor.
- Guest speakers/trainers from the USFWS or ADF&G, which are typically arranged through the BPXA Wildlife Compliance Advisor.
- Level Three Hazing Training Module including the firearms refresher (arranged by contacting Security personnel and/or the BPXA Wildlife Compliance Advisor).
- Tier 2 Procedure: “Wildlife in the BP (Alaska) Operated North Slope Oilfields: What Do I Do With This Animal.”

Hazing Procedures

If a bear should remain on-site for longer than 48 hours and is affecting the ability to operate, or if personnel are at risk, active deterrence, authorized under Sections 109(h)(1) and 112(c) of the Marine Mammal Protection Act, may be necessary. Hazing of a resting bear after a 48 hour period should be done in consultation with US FWS. Only trained security personnel or other authorized individuals are permitted to haze polar bears. All North Slope security officers assigned to bear guard duties will receive training at Level 2 or 3 as appropriate. Level 3 training is required of any security officer who is to engage in bear deterrence activities (i.e., hazing). Appendix A provides the policies and procedures for polar bear deterrence activities.

Monitoring and Mitigation Plan

Monitoring polar bear observations and encounters in the oil fields is required not only to assist in oil field safety, but also to supplement USFWS data collection. Polar bear conservation has benefited from monitoring associated with USFWS Incidental Take Program since 1993. Monitoring serves to assess the effect of industrial activities on polar bears by evaluating trends and effects of bear encounter rates, take frequency, as well as the location and timing of encounters. Additionally, through monitoring BPXA can help USFWS limit disturbance to maternal polar bear den sites. BPXA's monitoring plan includes gathering data to evaluate the effects of authorized activities on polar bears. The polar bear sighting reports serve the purpose of monitoring the short-term direct effects oil field activities may have on individual polar bears, by assessing localized changes in movements, behavior, and habitat use of polar bears in response to industry activities. BPXA maintains records of all polar bear sightings and compiles annual summary reports required by the USFWS. The summary report enumerates the number of walrus and polar bears encountered during specified activities, and estimate the number of incidental takes that occurred during specified activities. Mitigation of human-bear interactions is achieved by following the procedures detailed in previous sections of this Interaction Plan. A Plan of Cooperation to mitigate potential conflicts with subsistence hunting is included in this document as Appendix B.

Record Keeping and Reporting Procedures

BPXA is required to report all polar bear sightings and interactions to the USFWS **within 24 hours**. All instances involving harassment activities (e.g., use of cracker shells, vehicle horns, or other auditory devices; using vehicles or equipment to deter bears from an area; taking direct action to harass bears out of an area) must be reported "as soon as possible and **not later than 24 hours** after the occurrence". Only qualified and trained personnel approved by BPXA can haze polar bears. In addition, all known or suspected maternal polar bear dens or bears associated with a maternal den must be reported to the USFWS as soon as is practicable but **not longer than 12 hours** since discovery. In addition, all sightings must be reported to the BPXA Wildlife Compliance Advisor and Slope Environmental Team (**G AK HSSEE Wildlife Rept (North Slope)**) at the same time reports/notifications are sent to the agencies. It is BPXA policy to also report all polar bear sightings to USGS-BRD and ADF&G as both of these agencies have a scientific or management interest in polar bear sightings or interactions in the BPXA operated oil fields. Security or other appropriate personnel will report the sighting or hazing event to these agencies when they report to USFWS.

When a polar bear or walrus is sighted, a record must be made of the observations and any action taken on the appropriate form found in Appendix C of this Interaction Plan. After completing the appropriate reporting form security will distribute the form via fax to the USFWS, ADF&G, USGS, BPXA Environmental Advisors and the BPXA Wildlife Compliance Advisor at the following numbers (and as shown on the fax cover sheet in Appendix C):

- Craig Perham – USFWS; Fax 786-3816
- Dick Shideler – ADF&G; Fax 459-7332
- George Durner – USGS BRD; Fax 786-7150
- BPXA Wildlife Compliance Advisor; Fax 564-5020

Security will maintain fax and email confirmation receipts for verification that each completed Polar Bear Sighting Form was distributed to these groups. BPXA maintains records of all polar bear sightings, and compiles annual summary reports as specified in the LOAs issued by the USFWS.

Further action may be conducted by BPXA HSSEE (Anchorage) as required by either BPXA or agency personnel. If questions or concerns arise about reporting procedures or specific human-bear interactions security will contact the appropriate North Slope Environmental Advisor or the North Slope Environmental Team Leader via immediate page, or the BPXA Wildlife Compliance Advisor for further guidance (see attached Wildlife Notification Contact Numbers)

Reference Documents / Attachments

- **Appendix A:** BPXA Polar Bear Hazing and Deterrence Policies and Procedures
- **Appendix B:** Protocols for Bear Hazing
- **Appendix C:** Plan of Cooperation
- **Appendix D:** Polar Bear and Walrus Reporting Forms and Fax Sheets
- **Appendix E:** BPXA Wildlife Contact Numbers

Revision Log

Revision Date	Authority	Custodian	Revision Details
May 2, 2002	Janet Platt	Bill Streever	Initial Version
January 28, 2003	Janet Platt	Bill Streever	Revisions approved by the USFWS, see letter dated January 28, 2003
October 7, 2003	Stan Gates	Bill Streever	Review and update. Change in Authority due to reorganization.
June 11, 2007	Karen Wuestenfeld	Bill Streever	Updated to include Northstar Operations, clarify procedure and confirmation of fax record
December 13, 2007	Bill Streever	Diane Sanzone	Updated to revise Anchorage notifications from Bill Streever to Env. Studies Project Coordinator and change in agency reporting form and relevant phone/fax numbers
July 23, 2010	Karen Wuestenfeld	Diane Sanzone	Extensive changes made to the document due to the polar bear being listed under the Endangered Species Act and stricter reporting requirements from the USFWS.
September 27, 2011	Mike Brock	Beth Sharp	Reorganization and additions to align document with new USFWS Incidental Take Regulations. AMOC-North Slope General-0036
April 13, 2012	Mike Brock	Allison Erickson	Update formatting, Change Wildlife Compliance Authority to Compliance Advisor, Update Appendices info and Remove Appendices as they will remain a separate document in DK. AMOC-North Slope General-0045
Sept 14, 2012	Mike Brock	Allison Erickson	Small change to duration of interaction before hazing can take place.
October 16, 2012	Mike Brock	Allison Erickson	Updated to reflect input from USFWS: Addition of Appendix B, Protocols for Bear Hazing and insertion of revised text on hazing/ deterrence principles and hazing/ deterrence tools and techniques. AMOC-North Slope General-0074

Appendix A

BPXA Polar Bear Hazing and Deterrence Policies and Procedures

BPXA Polar Bear Hazing and Deterrence Policies and Procedures

Training Requirements

All North Slope security officers and/or those officers assigned anywhere to perform bear guard duties will receive annual refresher training for the appropriate Level 1, 2 or 3 Bear Interaction training. Level 3 trained individuals are the primary source for bear hazing and deterrence. Designated (Level 3) hazers will be firearms qualified and familiar with the capabilities and limitations of the tools (e.g., hazers will practice with actual deterrents during training classes).

Only USFWS Marine Mammals Management or individuals approved in writing by USFWS (currently, this is the Purcell training department) will provide the Level 3 training. All personnel assigned as trainers for any bear monitoring/hazing or bear guard program will meet annually and review and revise the training curricula and standards to assure consistency among trainers. Any revisions or significant modifications of training will be reviewed and approved by USFWS. Level 3 training for authorized hazers will occur, at a minimum, annually. Level 3 deterrence and hazing training will include, at a minimum, the following:

- Regulatory background (e.g., review of Marine Mammals Protection Act, Endangered Species Act, and associated definitions)
- Review of the polar bear interaction plan
- Biology and behavior of polar bears and preventing bear conflicts
- Hazing and deterrence principles, techniques and limitations
- Accountability and reporting requirements of hazers
- Identification of and field training with less lethal and lethal rounds

Only individuals who have completed all of Level 3 training *and* are directly authorized by the BPXA Security Manager will be authorized to have field training for the use of cracker shells and bean bags.

Steps of Progressive Deterrence and Hazing

Any type of deterrence or hazing should be conducted only as a last measure when needed to prevent escalation of an encounter and ensure the safety of workers. If a bear is present at a work site but all personnel are able to retreat indoors to safety or otherwise leave the work site the bear shall not be hazed, regardless of hindrance of the progression of work activities. If altering the bear's behavior is the only way in which to ensure the safety of workers, the following steps of progressive deterrence and hazing will be followed:

1. Intimidate with size and movement – position vehicle between bear and work area, shine headlights.
2. Startle with sound - yelling, clapping, followed by horn honking and sirens.
3. Use of less-lethal hazing techniques by trained personnel (cracker shells and bean bags). This should only be used as a technique with the prior agreement of the hazer and his/her supervisor. This can either be done in person or via the radio.

4. Lethal contact – fire lethal round at bear. This can only be used to protect the officers own life or the life of another. Examples scenarios include a charging bear with no avenue of escape for an officer or another or a bear that has already attacked an officer or another.

Hazing Deterrence Principles

1. Deterrence works best when other preventive strategies to keep bears from obtaining food and garbage rewards are successful.
2. The effectiveness of deterrents is a function of whether or not the bear has been rewarded for a behavior in the past, and how strong it's motivation is. The most difficult animal to deal with is a very hungry, determined bear that has repeatedly gotten into food and garbage previously at a site. The easiest animal to deal with is a curious somewhat wary bear that has never been previously rewarded by food associated with human activity.
3. Another difficult bear is one that is exhausted from a long swim or trek into a work environment. This particular type of bear should not be hazed for at least 48 hours, but should be monitored during this time to ensure worker safety.
4. Deterrent efforts also benefit from good detection efforts. Early detection of a bear's approach or presence permits more preparation time and provides more options for deterrent actions.
5. The best scenario is to be prepared to use deterrents, but not have to use them, letting a bear move on by the facility or through the area on its own while being monitored.
6. Deterrents should only be used for very specific, approved objectives and should never be used unnecessarily or out of frustration.
7. Finesse is usually better than force – just making a curious bear think twice about approaching people or facilities by moving a vehicle toward it may be enough to discourage it.
8. Restraint and patience in resorting to deterrent rounds and more serious tools is important. The desired result can often be obtained by less intrusive methods.
9. Overuse of deterrents can decrease their effectiveness. Bears will get used to most deterrents if repeatedly exposed to them.

Hazing / Deterrence Tools and Techniques

1. Hazing and deterring a bear basically involves trying to prevent the bear from some activity or getting it to move away by intimidating or frightening it. In the context of this policy, it should be done either visually, with sound, or by startling a bear through the use of a deterrent. Details about the advantages and limitations of the various deterrents will be covered during training.
2. One way to intimidate a bear is visually with size and movement. Generally a bear perceives large size and movement towards it as assertive/dominant. Moving towards a bear with a vehicle is often enough to haze it. Turning the vehicle so that it is sideways to a bear adds size and may aid in deterring the bear.

3. Noise is another way to intimidate or frighten a bear into moving away. Depending on the situation; horns, sirens, cracker shells, even yelling or clapping can haze a bear.
4. Less lethal ammunition such as a beanbag should startle a bear and is another way to dissuade a bear from approaching or frequenting facilities.
5. As a last resort lethal ammunition is available, but can only be used to protect the officers own life or the life of another.
6. Communication and patience are often overlooked tools that are available to the hazer. For example, if a bear is moving toward a work area, but all workers have been warned to remain inside, is it necessary to haze the bear? Is it possible for the hazer to move his vehicle between the bear's path and facilities entry and wait for the bear to pass through the area while maintaining a zone of safety for workers?

Lethal Take

If necessary, shotguns may be used as a mechanism for lethal take under Section 101(c) of the Marine Mammal Protection Act. Without specific authorization, the lethal take of a polar bear is warranted if such taking is imminently necessary for self-defense or to save the life of a person in immediate danger, and such taking is reported to the Service-MMM within 24 hours.

Ammunition Storage Inspection and Handling

As listed in the following table, less lethal and lethal rounds are to be labeled and stored in containers as specified.

Type of Round	Type of Casing	Label	Manufacturer	<u>STORAGE CONTAINER Label and Color</u>
Lethal Round	Non-transparent plastic	Federal Rifled Slug/Lead shell nose	Federal	"LETHAL SLUGS" Forest Green
Cracker Shells	Translucent plastic with orange inner projectile	Explosive	Stoneco, Inc/relabelled Northern Security Supply	"SHELL CRACKER" Orange
Super Sock	Translucent Plastic #2581	CTS super sock	Combined Tactical Systems/Super Sock	SUPER SOCK smoke grey

The color coded container boxes will be clearly labeled on the exterior LETHAL SLUGS and the less lethal rounds will be labeled SUPER SOCK and CRACKER SHELLS. A minimum of five rounds and a maximum of 25 rounds of each type of ammunition will be carried in each container.

Evidence tape will be placed over the lid of the ammunition container with the name and date of the ammunition inspector (e.g., security supervisor). The ammunition cans will also be inspected by the officer assigned to bear hazing duties at the beginning of each shift to ensure that the evidence tape is in place. If the evidence tape is absent or if there is a suspicion that it has been tampered with then the security supervisor will be called for an inspection of the contents. Once this is complete and the supervisor is comfortable with the contents then new evidence tape will be added.

No ammunition will be carried in a shotgun chamber or magazine (tube) and only security personnel are authorized to carry shotguns and ammunition in their vehicles. Ammunition purchase requests will be routed through the security manager.

Fire Arms Discharge Reporting and Evidence Retention

Any discharge of a firearm will require the completion of the following Discharge of Firearms Report, which will be sent to the Security Manager. The report must be completed and sent prior to the end of the shift of duty. The report will be forwarded to the BPXA security director within 24 hours.

All evidence including spent shell casings will be collected and preserved in accordance with standard law enforcement evidence collection and chain of custody protocols. The evidence will be maintained for a period of sixty (60) days. US FWS personnel have the right to demand access to the evidence and every effort must be given to facilitate their requests. The evidence will be disposed of following this sixty day period.

BP Security Director: Billy Andrews
900 E. Benson Blvd.
PO Box 196612
Anchorage, AK 99519
907-564-5499
907-564-4799 (Fax)

DISCHARGE OF FIREARMS REPORT

DATE: _____ OFFICER'S NAME: _____

TIME: _____ CONTACT NUMBER/EMAIL: _____

SECURITY IR #: _____

SYNOPSIS: (Reason for Discharge of Firearms) _____

Witness: _____

LOCATION: _____

ESCALATION OF FORCE:

- OFFICER PRESENCE/VERBAL
- NOISE MAKERS/HORN/SIREN/LIGHTS
- CRACKER ROUNDS
- BEAN BAG/SUPER SOCK
- LETHAL FORCE

TYPE OF AMMUNITION USED & NUMBER OF ROUNDS FIRED: BUCK SHOT;
 SLUGS; BEAN BAGS; CRACKER SHELLS; .40 CAL;
 .223 CAL; OTHER (List)

SPENT OR USED AMMUNITION LOGGED INTO EVIDENCE? YES

PROJECTILE RECOVERED AND LOGGED INTO EVIDENCE? YES

Instructions: **Officer** – email this report to AK, Ops Security Sgt.
Operation Sgt – Review the report and email to AK, Ops Security Lt.
and AK, Ops Security Captain
Operation Lt. – Review the report
Captain – Review and forward report to Billy Andrews and John Glass
within 24 hours. (billy.andrews@bp.com) (john.glass@nmsusa.com)

Appendix B Plan of Cooperation

BPXA Plan of Cooperation

Throughout the history of BPXA's Alaska North Slope operations and through permitting and compliance related activities for the Prudhoe Bay, Greater Point McIntyre, Milne Point, Endicott, Badami and Liberty Units, BPXA has made an effort to minimize the impact of our operations on subsistence activities related to polar bears and Pacific walrus. BPXA has coordinated closely with North Slope communities and stakeholders in the vicinity of our operations including: the North Slope Borough (NSB) Planning and Wildlife Department, Nuiqsut, Barrow, Kaktovik, Inupiat Community of the Arctic Slope, the Alaska Eskimo Whaling Commission (AEWC) and the Nanuuq Commission. The "2011 Open Water Season Programmatic Conflict Avoidance Agreement" (CAA) became effective as of March 31, 2011. Historically, BPXA has participated in many meetings with NSB communities and stakeholders on the topic of subsistence resources and much of this dialog is reflected in various documents, including the following: Environmental Impact Statements (EIS), Environmental Assessments (EA), BOEMRE Development and Production Plans, NSB Master Plan and email correspondence as listed in the citations below. Subsistence hunting issues were discussed in many of these meetings. No conflicts with subsistence polar bear and Pacific walrus hunting were identified in the meetings.

Plan of Cooperation with Subsistence Users - Citations

1) BP Exploration (Alaska) Inc. Liberty Development Project Master Plan. 2008. Anchorage, Alaska.

Page 1-1 / Liberty Project History

In August 2005, BPXA decided to pursue use of uERD from an onshore or existing Endicott Field location. Such a project eliminates the offshore impacts of new, stand-alone island and of pipeline construction. Recent advancements in drilling technology have made such a project feasible. This change in project scope significantly mitigated the potential offshore environmental impacts related to the Boulder Patch and marine mammals, and concerns of the North Slope Inupiat communities related to the bowhead whale and subsistence whaling.

Page A-3 / Section A.1.4 Environmental Training Program

BPXA has a comprehensive environmental and safety training program which will be implemented for the Liberty Project. This program includes components to assure that all personnel (BPXA and contractors) are appropriately trained in wildlife avoidance and interactions, and fully understand the need for protection of subsistence wildlife resources and endangered species. A list of potential applicable environmental, safety, and technical training is provided in Section 11.

2) BP Exploration (Alaska) Inc., (2007). Liberty Development Project Development and Production Plan. Attachment A. Environmental Impact Analysis. April 2007. Anchorage, Alaska.

Page 2-79; Section 2.15.3.4 - Subsistence-Harvest Seasons and Harvest Success Profile; Polar Bears

Polar Bears: The harvest of polar bears (nanuq) by Nuiqsut hunters begins in mid- September and extends into late winter. Polar bear meat is sometimes eaten, although only limited harvest data are available. The NE NPR-A Final Amended IAP/EIS (USDOI, BLM, 2004b) notes: “Nuiqsut residents have indicated that polar bears are not an important subsistence resource for the community and if taken would be an incidental harvest.”

Page 3-45; Section 3.3.12.2 - Subsistence

“More specifically, with respect to subsistence-harvest patterns, the Liberty FEIS [Section III(1)] concluded:…Tainting concerns also would apply to polar bears and seals and beluga whales, walruses, fish, and birds. Additionally a large oil spill could cause potential short-term but serious adverse effects to long-tailed ducks and king and common eider populations. A potential loss of one or two polar bears could reduce their availability locally to subsistence users, although they are seldom hunted by Nuiqsut hunters except opportunistically while in pursuit of more preferred subsistence resources.”*

3) U.S. Department of the Interior, Minerals Management Service. 2002. Alaska OCS Region. Liberty Development and Production Plan. Final Environmental Impact Statement. Anchorage, Alaska.

Page III-11 / Volume I; Section III.A.2.h

Tainting concerns also would apply to polar bears, seals, beluga whales, walruses, fish, and birds. Additionally, a large oil spill could cause potential short-term but serious adverse effects to long-tailed ducks and king and common eider populations. A potential loss of one or two polar bears could reduce their availability locally to subsistence users, although they are seldom hunted by Nuiqsut hunters except opportunistically while in pursuit of more preferred subsistence resources.

Page III-11 / Volume I; Section III.A.2.h

For the communities of Nuiqsut and Kaktovik, disturbances periodically could affect subsistence resources, but no resource or harvest area would become unavailable and no resource population would experience an overall decrease. Disturbance and noise periodically could affect subsistence species that include bowhead whales, seals, polar bears, caribou, fish, and birds. Oil-spill cleanup would increase these effects. Disturbances could displace subsistence species, alter or reduce subsistence-hunter access to these species and, therefore, alter or extend the normal subsistence hunt. However, potential disruptions to subsistence resources should not displace traditional practices for harvesting, sharing, and processing those resources.

Page III-159 / Volume 1; Section III.D.7.h

"A potential disturbance to polar bears could reduce their availability locally to subsistence users, although they are seldom hunted by Nuiqsut hunters except opportunistically while in pursuit of more preferred subsistence resources. No harvest areas would become unavailable for use, and traditional practices for harvesting, sharing, and processing subsistence resources would continue."

Page V-39 / Volume 1; Section V.C.2.b.2(b)

There is no clear indication that disturbance from oil exploration and development has had an additive or synergistic effect on the polar bear population. "Two hunters from Nuiqsut reported that polar bear activity has decreased in recent decades around Prudhoe Bay and west, to the Colville River," while "some hunters stated that the number of polar bears varies from year to year but has remained stable overall" (Kalxdorff, 1997).

Page V-56 / Volume 1; Section V.C.8.a

A potential loss of polar bears from oil spill effects could reduce their availability locally to subsistence users, although they are seldom hunted by Nuiqsut hunters except opportunistically while in pursuit of more preferred subsistence resources.

Page VI-57 / Volume 2; Section VI.B.1.c.4(b)

According to whaling captain Thomas Napageak's statement at the Beaufort Sea Sale 144 Public Hearings in Nuiqsut, the taking of polar bear is not very important now because Federal regulations prevent the selling of the hide: "...as valuable as it is, [it] goes to waste when we kill a polar bear" (USDOJ, MMS, 1995b).

Page E-1-4 / Volume 4; Appendix E-1.B.2

Summary of Oral Comments Received at Scoping Meetings: Scoping meetings were held in Nuiqsut (March 18), Barrow (March 19), Anchorage (March 25 and April 8), Kaktovik (March 31), and Fairbanks (April 1). Staff from MMS and representatives from BPXA attended these meetings, provided an overview of the project, answered questions about the proposed Liberty project and the ongoing process and schedule, listened to and noted the concerns voiced about the proposed project. Oral comments were received from 82 individuals who attended at least one of the scoping meetings.

4) U.S. Army Corps of Engineers, Alaska. 1999. Final Environmental Impact Statement. Beaufort Sea Oil and Gas Development/Northstar Project. Anchorage, Alaska.

Page 2-12 / Volume 2; Section 2.7.2.2

Preparation of Questions to Obtain Traditional Knowledge: Specific questions were used for Barrow, Nuiqsut, and Kaktovik community meetings to gather Traditional Knowledge on the

Alaskan Beaufort Sea and the project. Questions came from three sources. First, questions were prepared by individuals responsible for preparation of this EIS. Second, questions were developed from review of past testimony. Third, BPXA provided questions related to the BPXA proposed project design, construction, and operation.

Page 2-12 / Volume 2; Section 2.7.2.3

Data Collection Trips to Communities: Nuiqsut - August 13-16, 1996: Meetings were scheduled to ask Traditional Knowledge questions of the Nuiqsut whaling captains on August 14 and in a general community meeting on August 15. Seven of the ten community whaling captains attended the August 14 meeting and provided a great deal of information based on their knowledge and experience. This meeting provided valuable information on historical use of the project area, concentrations of fish and wildlife, and experience with oil spill cleanup drills.

Page 2-15 / Volume 2; Section 2.7.2.3

Data Collection Trips to Communities: Barrow - August 27-28, 1996: At the fall meeting of the Barrow Whaling Captains' Association held August 27, 1996, BPXA provided a summary description of its proposed project. Following BPXA's presentation, the goal of integrating Traditional Knowledge into the EIS was explained. Times were scheduled with whaling captains to discuss Traditional Knowledge and BPXA's proposed project the following day and evening. A total of four whaling captains contributed information. Trip summaries were prepared for each of the data collection community meetings. In some cases, participants allowed meetings to be taped, and information was recorded on maps. Information gathered was incorporated into the Traditional Knowledge database. The majority of information collected in these community meetings concerned sea ice, currents, storms, fish, wildlife, historic use of specific lands and waters, contemporary subsistence activities and use areas, and aspects of project design.

Page 6-5 / Volume 3; Section 6.2.3

Marine Mammals: Inupiat hunters have noted that there are more polar bears than there used to be. Archie Ahkiviana, a whaling captain from Nuiqsut, noted that polar bears, "Are getting [to be] too many," and added, "One time they counted over 100 polar bears right down below Endicott." (Pers. Comm., Nuiqsut Whaling Captains Meeting, August 13, 1996:25-26). Hunters have observed that polar bears may be attracted to oil and gas exploration sites. Thomas Napageak, a whaling captain and President of the Native Village of Nuiqsut, stated that polar bears, "Go toward the noise or anything that moves." (Pers. Comm., Nuiqsut Whaling Captains Meeting, August 13, 1996:27). Inupiat hunters also know that polar bears are sensitive to noise during the denning season. Billy Adams, representing the NSB, stated, "Polar bears that den ... will not tolerate noise disturbance." (USDOI, MMS, 1986:8). Nuiqsut elder Samuel Kunaknana observed that polar bears have built dens along rivers because of high snow drifts and lack of ice movement, as compared to sea ice (USDOI, MMS, 1979:5).

Page 6-71 / Volume 3; Section 6.5.1.5

Inupiat hunters have noticed that there are more polar bears than there once were (A. Ahkiviana - Pers. Comm., Nuiqsut Whaling Captains Meeting, August 13, 1996:25-26).

Appendix C

Polar Bear and Walrus Reporting Forms and Fax Sheets

United States Department of the Interior
FISH AND WILDLIFE SERVICE
1011 E. Tudor Road
Anchorage, Alaska 99503-6199

BPXA LOA 11-21 and 12-INT-01

Type of Polar Bear Sighting Report: ON LAND _____ **MARINE** _____

Date: _____ Observer Name: _____
Time: _____ Contact number/email: _____

Location _____
Latitude: _____ Longitude _____ Datum _____

Weather conditions: Fog _____ Snow _____ Rain _____ Clear _____ Temperature _____ F/C
Wind speed _____ mph/kts Wind direction _____ Visibility: Poor _____ Good _____
Fair _____ Excellent _____

Number of bears:
_____ Adult M/F _____ Sow/cub(s)
_____ Sub-adult _____ Sow/yearling(s)
_____ Unknown _____ Sow/2YO(s)

Estimated distance of bear(s) from personnel (closest point) _____ (meters) and facility (closest point) _____ (meters)

Estimated distance of bear(s) from vessel or location _____ (meters)

Bear behavior (Initial Contact):
Curious _____ Swimming _____ Resting _____ Hunting _____ Walking _____ Other (explain) _____

Bear behavior (After Contact):
Curious _____ Swimming _____ Resting _____ Hunting _____ Walking _____ Other (explain) _____

Possible attractants present: _____

Description of encounter/other bear behavior _____

Duration of encounter: _____

- Deterrents used/distance (IN ORDER OF ESCALATION 1-9):**
- | | |
|-------------------------------------|------------------------------|
| 1) Bear Monitors _____ | 6) Sirens _____ |
| 2) Vehicle (position/revving) _____ | 7) Acoustic Recordings _____ |
| 3) Spotlight/Headlight _____ | 8) Chemical Repellents _____ |
| 4) Yelling/Clapping _____ | 9) Other _____ |
| 5) Horn _____ | |

Send fax to the all agency and BPXA contacts listed below:
USFWS – Craig Perham (907-786-3810) (FAX 907-786-3816); Time _____ Date _____
USGS – George Durner (907-786-7082) (FAX 907-786-7150); Time _____ Date _____
ADFG – Dick Shideler (907-459-7283) (FAX 907-459-7332); Time _____ Date _____
BPXA – Wildlife Compliance Authority (907-564-4941) (FAX 907-564-5000) Time _____ Date _____

Send email to:
Craig_Perham@fws.gov Time _____ Date _____
G AK HSSEE Wildlife Rept (North Slope); Time _____ Date _____

Appendix D

BPXA Polar Bear and Walrus Contact Numbers

Polar Bear and Walrus Notification Contact Numbers

BP Exploration (Alaska) Inc.

Environmental Team Leader, HSSEE, Anchorage	907-564-4941
Wildlife Compliance Authority, HSSEE, Anchorage	907-564-4941
Director, Reg Compl and Env, Anchorage	907-564-5501
Fax for BPXA HSSE, Anchorage	907-564-5000
North Slope Security Captain	907-659-5181
MCC Security Dispatch	907-659-5631
Endicott Security	907-659-6800
BOC Security	907-659-4441
PBOC Security	907-659-5634
MPU Security	907-670-3300
HSSEE Environmental Team Leader (North Slope)	907-659-5196 office 659-4236; 579 pager
HSSEE Environmental Advisor East	907-659-5999 office 659-5100; 1746 pager
HSSEE Environmental Advisor West	907-659-4789 office 659-4236; 966 pager
HSSEE Environmental Advisor Central	907-659-5893 office 659-5100; 2675 pager
HSSEE Environmental Advisor North	907-659-6810 office 907-659-6799; 190 pager
HSSEE Environmental Advisor MPU	907-670-3382 office 9070-670-3471; 257 pager
HSSEE Environmental Tech Northstar	907-670-3508 office 659-5100; 1487 pager
BPXA Wildlife Email Reporting	G AK HSSEE Wildlife Rept (North Slope)

Federal and State Agency

Craig Perham	(USFWS – Primary contact)	907-786-3810 (work) 907-887-3082 (off-duty) 907-786-3816 (fax)
Christopher Putnam	(USFWS – Secondary contact)	907-786-3844 (work) 907-268-0577 (off-duty)
Dick Shideler	(ADF&G)	907-459-7283 (work) 907-459-7332 (fax) 907-455-6897 (home)
George Durner	(USGS)	907-786-7082(work) 907-786-7150 (fax)