

2008-2009 SUBSISTENCE PLAN
ConocoPhillips Alaska, Inc.
National Petroleum Reserve – Alaska (NPR-A)
December, 2008

This Subsistence Plan was developed to comply with stipulation number 59 of the Record of Decision, Northeast National Petroleum Reserve – Alaska, Integrated Activity Plan/ Environmental Impact Statement. Stipulation 59 states:

“During exploration, development, and production, the lessee shall develop and implement a plan, approved by the AO [BLM Authorized Officer] in consultation with the Research and Monitoring Team and the Subsistence Advisory Panel, to monitor the effects of activities on subsistence. The lessee shall provide biannual reports to BLM, the Research and Monitoring Team, and the Subsistence Advisory Panel.”

In accordance with the above, ConocoPhillips Alaska, Inc. (CPAI) hereby submits this Subsistence Plan to the AO responsible for surface activities (and/or his designated representative), the Kuukpik Corporation, the Inupiat Community of the Arctic Slope, and the Subsistence Advisory Panel and the Research and Monitoring Team. It should also be noted that selected NSB permits associated with CPAI’s NPR-A activities require CPAI to consult with the NSB Planning Commission and the Kuukpik Subsistence Oversight Panel regarding proposed operations and potential subsistence issues that may arise.

The following actions will be performed to comply with stipulation 59:

Subsistence Representative (SR) – CPAI has existing contracts with the Kuukpik Corporation, LCMF and with the Inupiat Community of the Arctic Slope (ICAS) to employ individuals to serve as subsistence representatives. Nuiqsut-based SRs will be utilized for ice road construction from the Kuparuk 2-L drillsite to the Alpine area and into the NPR-A NE area.

An overview of the SR positions is attached. The SR is the North Slope residents’ representative in the field. This position’s primary duties are to observe proposed and ongoing 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. 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 are being identified at this time. Those names will be available in the next few weeks.

Winter Activities Coordinator (WAC) –CPAI Native Relations personnel will serve as the Nuiqsut Winter Activities Coordinator (WAC) for winter 2008-2009 NPR-A activities. CPAI's employee, Hazel Monroe, will serve in this role and will be present in Nuiqsut every other week, while winter exploration activities are ongoing. In addition, CPAI will employ a full-time Environmental Field Coordinator to be based out of the Alpine camp to assist when Hazel is off the slope. The Nuiqsut WAC will be CPAI's local primary point of contact for Nuiqsut residents for the 2008-2009 winter operating season. An overview of the position is attached. This position's primary duties are to maintain contact with the SR and other CPAI representatives to keep informed on CPAI's winter field activities in the NPR-A, 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 express concerns with CPAI's NPR-A activities. The WAC will also receive reports from the SR on potential or current threats to subsistence activities observed in the field and work with the SR and CPAI representatives as necessary to develop satisfactory solutions to issues that may arise from CPAI's operations. The WAC is expected to disseminate information regarding CPAI's NPR-A activities to Nuiqsut residents by posting periodic reports on CPAI activities in established information centers in Nuiqsut (e.g. City Office, U.S. Post Office, City Store). Additionally, the WAC is expected to assist CPAI in arranging selected Nuiqsut (e.g. community meetings), CPAI travel to Nuiqsut, and other similar activities. The WAC may also be requested to participate in selected meetings in Nuiqsut (or other places in Alaska) regarding CPAI's NPR-A winter activities. The WAC will maintain a logbook documenting activities performed, information received from the SR, input received from Nuiqsut residents, and other similar information. This logbook 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.

Ice Road Monitors (IRM) – CPAI plans to construct an ice road up to the NPR-A from the existing infrastructure in Kuparuk. CPAI will hire two IRMs for monitoring the ice road in the Alpine area. There will be ice roads and pads construct during the 2008/2009 drilling season to support our drilling and well testing activity. 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, the IRM position will combine with the onsite SR position at the drill site to monitor the ice airstrip and local ice roads near the exploration drill site. They 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 will be expected 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.

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 seismic train is about to encounter a previously unidentified gravesite) the SR will have the authority to direct changes in those activities (e.g. direct the seismic 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 resolutions 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.

Monitoring – Monitoring of the effects of activities on subsistence will be accomplished in part by information gained from reports from residents as discussed above. In addition, CPAI will continue to hold public meetings in five North Slope communities in compliance with stipulation 61. (Stipulation 61 requires meetings in Atqasuk, Anaktuvuk Pass, Barrow, and Nuiqsut; CPAI will also hold meetings in Wainwright). 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.

CPAI Point of Contact – CPAI will designate a single point of contact for monitoring and resolving NPR-A subsistence-related issues. Hazel Monroe will be the point of contact for the 2008/09 exploration season. This position will be the primary contact for the SR to communicate with and will work with the SR to assist in resolution of subsistence/industry conflicts (i.e. addressing Stipulation 61). 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, the WAC, and other appropriate parties (e.g. CPAI Anchorage based personnel) to develop and implement such agreements (i.e. conflict avoidance agreements or other similar arrangements). This person will also maintain a logbook to record when CPAI was informed about a subsistence-related issue, the resolution method recommended, and whether the issue was satisfactorily resolved. Using information compiled from the SR Logbook, the WAC logbook, the CPAI contact's logbook, and public NPR-A meetings, CPAI will prepare and submit the required biannual report.

Biannual Reports – Information from the SR and WAC logbooks as well as information from community meetings and other sources (e.g. IRM data sheets) will be used to compile biannual reports that will be submitted to the AO and the Subsistence Advisory Panel. Reports will be submitted after the end of May and November of each year that CPAI operates in the NPR-A. The May report will summarize activities during the previous winter season, and the November report will summarize summer activities. Biannual reports will include the following information, at a minimum:

- Summary of reports by residents to the SR and/or WAC, and resolutions for each issue.
- Summary of information gathered from public meetings, and, if applicable, resolutions of any subsistence issues.
- Required monitoring.
- Lessons learned, or steps to take to prevent adverse affects to subsistence.
- Outstanding or unresolved issues.

**National Petroleum Reserve – Alaska (NPR-A)
ConocoPhillips Alaska, Inc. (CPAI)
2008-2009 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 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 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 and live at the exploration drilling camp (Pioneer 1 and Grandview 1 (East) for 08/09 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. 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.

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.

