



ALASKA ESKIMO WHALING COMMISSION  
P.O. Box 570    UTQIAGVIK (BARROW), ALASKA 99723

January 20, 2021

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Bryce Barlan, BSEE  
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**Via regulations.gov and email**

**RE: Oil and Gas and Sulfur Operations on the Outer Continental Shelf—  
Revisions to the Requirements for Exploratory Drilling on the Arctic Outer  
Continental Shelf, Regulation Identifier Number (RIN) 1082-AA01  
Docket Number: BSEE-2019-0008**

Dear Dr. Kendall, Mr. Fesmire, and Mr. Barlan,

Please accept this request for extension to the comment period on behalf of the Alaska Eskimo Whaling Commission (AEWC) in response to the Proposed Rule related to Exploratory Drilling on the Arctic Outer Continental Shelf. We request an additional 60 days. We also request a meeting with the Bureau of Ocean Energy Management (BOEM) and Bureau of Safety and Environmental Enforcement (BSEE) to discuss the Proposed Rule during the comment period. In addition, we request that the two agencies host public meetings to allow adequate participation from our communities.

As you know, AEWC is a non-profit organization representing Inupiat Subsistence Whaling Captains in Northern coastal Alaska. AEWC represents the 11 bowhead whale subsistence hunting villages of Utqiagvik (Barrow), Nuiqsut, Kaktovik, Pt. Hope, Kivalina, Wales,

Savoonga, Gambell, Little Diomede, Wainwright and Pt. Lay. Our Whaling Captains and communities rely on the subsistence harvest of bowhead whales and other marine mammals in or adjacent to the Beaufort and Chukchi Seas. Importantly, we also share the fruits of our harvest beyond our 11 communities, with Alaskan Native families and communities through the state.

On behalf of our Whaling Captains, the AEWC is responsible for protecting the bowhead whale and the bowhead whale subsistence harvest, and have thousands of years of traditional knowledge about our Arctic ecosystems. We also have many decades of experience partnering directly with Federal agencies and the North Slope Borough (NSB), and offshore and nearshore operators to ensure that oil and gas activities that move forward in the Arctic avoid conflicts with our subsistence activities and mitigate potential adverse impacts to the bowhead whale and our subsistence traditions.

We understand the Proposed Rule includes extensive changes to the current requirements promulgated through the 2016 Arctic Exploratory Drilling Rule.<sup>1</sup> Further, it would add new provisions to BSEE's regulations pertaining to suspensions of operations (SOO), and BOEM's Exploration Plan (EP) and Development and Production Plan (DPP) regulations. We recognize the stated goals of the agencies to ensure regulations do not become so burdensome that oil & gas development is no longer economically feasible, and to meet the requirements of the Executive Orders. However, the development of these regulations should not be rushed as it has the potential for impacts to our food security across the Arctic.

The 60-day comment period began on December 9, and overlaps with the busy holiday season. The comment period is also occurring during the global pandemic when many of our staff continue to work from home and when we cannot hold in-person gatherings. Thus, we ask for the extension and the opportunity to discuss with the agencies.

Thank you for your consideration. We look forward to meeting with you to discuss this important Proposed Rule.

Sincerely,



John Hopson, Jr.  
Chairman  
Alaska Eskimo Whaling Commission

cc: Representative Don Young  
Senator Lisa Murkowski  
Senator Dan Sullivan  
Mayor Harry K. Brower, Jr., North Slope Borough

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<sup>1</sup> "Oil and Gas and Sulfur Operations on the Outer Continental Shelf-Requirements for Exploratory Drilling on the Arctic Outer Continental Shelf," 81 FR 46478 (July 15, 2016).