

STATE OF ALASKA

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March 15, 2005

Mr. Robin West
Refuge Manager
Kenai National Wildlife Refuge
P.O. Box 2139
Soldotna, Alaska 99669

Dear Mr. West:

The State of Alaska has reviewed the information contained in the email notice from George Constantino, dated March 7, 2005, regarding a proposed Compatibility Determination (CD) for a gas storage operation within the Swanson River Oil and Gas Unit in the Kenai Refuge. The Union Oil Company of California, the current production lease operator, is proposing to inject natural gas produced throughout the area into the Swanson River formation to offset potential gas delivery problems. Utilizing such gas storage capacity will allow Union Oil to adjust seasonal gas distribution to Kenai and Southcentral markets – allowing for greater supply in the winter months when demand is highest.

Oil and gas production has occurred on the Kenai Refuge since the first commercial discovery in 1957. This gas storage operation will utilize infrastructure that already serves existing development of oil and gas resources within the Refuge. For all practical purposes, the Refuge will experience no additional impacts since the use is similar to other oil and gas operations already occurring in the Refuge.

For these reasons, the State asserts the proposed use will not materially interfere with the purposes of the Refuge and will have little, if any effect on the resources of the Refuge. Therefore, the State of Alaska strongly urges the US Fish and Wildlife Service to find the proposal for storage of natural gas within the Kenai National Wildlife Refuge compatible with refuge purposes.

Thank you for the opportunity to provide these comments for your consideration. If you have any questions, please contact me at 907-269-7477.

Sincerely,

Sally Gibert
ANILCA Program Coordinator