

# STATE OF ALASKA

## ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

**SEAN PARNELL, Governor**

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April 13, 2012

Mr. Peter Wikoff, Natural Resource Planner  
U.S. Dept. of the Interior, Fish & Wildlife Service  
1011 East Tudor Road, MS 231  
Anchorage, Alaska 99503

Re: Scoping Comments regarding Nordaq Energy, Inc. Natural Gas Development Proposal  
On Kenai National Wildlife Refuge

Dear Mr. Wikoff:

The State of Alaska reviewed the Fish and Wildlife Service (Service) scoping notice and presentation materials prepared by the Service, as well as presentation and application materials prepared by Nordaq Energy, Inc. in support of the proposed Shadura natural gas development facility to be partially located on Kenai National Wildlife Refuge lands. The proposal includes an application for a right-of-way (ROW) on refuge lands, pursuant to Title XI of ANILCA that provides “adequate and feasible access for economic or other purposes.” This letter contains the consolidated scoping comments of state agencies.

The State is supportive of the proposed action to issue a right-of-way on refuge lands, and understands that the applicant’s proposal is captured in the Service’s scoping materials as Alternative 1- Northern Access Route 1. The surface land for this access road, drill site, processing pad and related facilities is a part of the Kenai National Wildlife Refuge, and the subsurface mineral estate in the project area is owned by the Cook Inlet Region, Inc. The State is a contiguous surface and subsurface estate owner on the northern boundary of the Refuge in the project area. Lands along the northern boundary contain both general state lands and the state legislatively designated lands of Captain Cook State Recreation Area (SRA). The ROW applicant, NordAq Energy Inc., holds an oil and gas lease adjacent to the northern boundary of the Refuge, has submitted a Plan of Operations (currently under review) to conduct oil and gas activities on this lease and has obtained permits for the use of lands within Captain Cook SRA as part of this proposal. Access to the proposed drilling site on refuge lands is required for continued delineation and testing of gas resources within the project area. The exploration work on the Refuge may also lead to discovery and development of contiguous oil or gas resources.

The State supports the approval of a ROW to provide the applicant access for further exploration and delineation of the discovered gas resource. There is urgent and well-documented need for development of oil and, especially, gas resources in the Cook Inlet region and statewide. Access is essential for resource development, and may provide the opportunity for development of additional federal, private, or adjacent state resources while minimizing surface disturbances.

The State appreciates the Service's willingness to work with the applicant to help develop oil and gas resources in the region.

There are cataloged anadromous streams within the footprint of the west access identified in Nordaq's application materials as Alternative Routes A, B, and C. Nordaq's preferred Alternative Route C proposes to cross two anadromous streams and one resident fish stream. The application states that Nordaq will acquire Title 16 Fish Habitat Protection Permits for the proposed stream crossings. We recommend the applicant contact Alaska Department of Fish & Game's Area Habitat Biologist, Ginny Litchfield, at (907) 714 2477 regarding any Title 16 stream crossing permits.

Thank you for your consideration of these comments – we hope to provide additional comments during the environmental review of the proposal. If you have questions, please contact me at (907) 334-2563.

Sincerely,



Nina Brudie  
ANILCA Project Coordinator

cc: Susan Magee, ANILCA Program Coordinator