



## **Supplemental Information Submission to Incidental Harassment Authorization Request for the Non-Lethal Harassment of Whales and Seals during the Simpson Lagoon OBC Seismic Survey, Beaufort Sea, Alaska, 2012**

### **1. Introduction and Purpose**

BP Exploration (Alaska), Inc. (BPXA) plans to conduct a 3D ocean bottom cable (OBC) seismic survey in the Simpson Lagoon area of the Alaskan Beaufort Sea during the open water season of 2012. BPXA has requested that NMFS issue an Incidental Harassment Authorization (IHA) allowing non-lethal harassment of marine mammals incidental to these activities. This application was submitted pursuant to Section 101 (a)(5)(D) of the Marine Mammal Protection Act (MMPA), 16 U.S.C. § 1371 (a)(5). Because the proposed activity takes place near the village of Nuiqsut, a traditional Arctic subsistence hunting community, BPXA must submit to NMFS either a plan of cooperation or information that identifies what measures have been taken and/or will be taken to minimize any adverse effects on the availability of marine mammals for subsistence uses.

BPXA submits this supplemental information as per NMFS request to address any other potential adverse effects on the availability of marine mammals for subsistence use from its proposed OBC seismic survey in Simpson Lagoon, Beaufort Sea.

BPXA considers participation in the Conflict Avoidance Agreement (CAA), with the Alaska Eskimo Whaling Commission (AEWC) and North Slope communities' Whaling Captains' Associations, as the written Plan of Cooperation with the nearby communities with respect to subsistence hunting. As stated in our IHA request, few beluga whales and ice seals are harvested by either Nuiqsut or Kaktovik. We do not anticipate that the activities will have an adverse effect on the availability of these marine mammals as subsistence resources. BPXA will communicate with subsistence users in the area to ensure that our activities do not prevent access to the resources should hunting take place during the planned survey.

### **2. Project Overview**

BPXA plans to conduct a 3D ocean bottom cable (OBC) seismic survey in the Simpson Lagoon area of the Alaskan Beaufort Sea during the open water season of 2012. The proposed OBC seismic survey will use three source vessels to acquire data both within and outside the barrier islands.

The planned start date of seismic data acquisition offshore of the barrier islands is 1 July depending on the presence of ice. Limited layout of receiver cables might be possible on land and barrier islands before the ice has cleared. To limit potential impacts to the bowhead whale migration and the subsistence hunt, in accordance with the CAA, no airgun operations will take place in the area north of the barrier islands after 25 August. Surf zone geophone retrieval may continue for a brief period after airgun operations are complete.

### **3. Community Engagement**

#### *Conflict Avoidance Agreement*

As in previous years, BPXA participated in the CAA meetings for the proposed 2012 seismic survey. BPXA participated in meetings held by the AEWC and representatives of the Nuiqsut Whaling Captains' Association in December, 2011 and February, 2012. The planned seismic survey activity was presented and CAA language was circulated and approved by the community based Whaling Captains' Associations. BPXA signed the CAA on March 27, 2012. BPXA will comply with the CAA terms and NSB permit stipulations, which address plans to meet with the affected community to resolve conflicts and notify the communities of any changes in the operation. A copy of the signed CAA agreement has been submitted to NMFS. The CAA addresses bowhead whale subsistence hunting and communications with whaling crews.

### *Stakeholder Communications / Meetings*

BPXA has also met formally and/or informally with several stakeholder entities; the North Slope Borough (NSB), NMFS, NSB Department of Wildlife Management (DWM), AEWG, Inupiat Community of the Arctic Slope (ICAS), Inupiat History Language and Culture Center (IHLC), USFWS and ADF&G. BPXA will be in Nuiqsut in May and will present the project and answer questions and concerns from community members.

### **3. Measures to Reduce Impact**

The measures to reduce impacts and ensure communication with the community listed below were developed from the CAA and NSB draft Development Permit (with specific stipulations addressing subsistence users under NSBMC 19.70.050).

BPXA will comply with the CAA terms and NSB permit stipulations to address plans to meet with the affected community to resolve conflicts and notify the communities of any changes in the operation. More detailed information about the mitigation measures that will be implemented to reduce impacts to marine mammals are outlined in Section 11 of the IHA request.

- MMO's on board vessels are tasked with looking out for whales and other marine mammals in the vicinity of the vessel to assist the vessel captain in avoiding harm to whales and other marine mammals.
- Vessels and aircraft will be operated in a manner to avoid areas where species that are sensitive to noise or movement are concentrated at times when such species are concentrated.
- Communications and conflict resolution are detailed in the CAA. BPXA will participate in the Communications Center that is operated annually during the bowhead subsistence hunt.
- Communicate with the village of Nuiqsut – discuss community questions or concerns including subsistence hunting activities.
  - A pre-project meeting is scheduled in May. If additional meetings are requested, they will be set up in a similar manner.
  - Contact information for BPXA will be provided to community members and distributed in a manner agreed at the community meeting.
- Inupiat Marine Mammal Observers will be employed and work on seismic source vessels
- Helicopter landing pads will be sited in a manner to minimize impacts to wildlife
- Follow a Polar Bear and Pacific Walrus Awareness and Interaction Plan that addresses food and waste management, personnel training, and safety and communication regarding polar bears.

### **5. Future Plan of Cooperation Consultations**

BPXA will continue to engage with the affected subsistence communities regarding its Beaufort Sea activities as done throughout the history of BPXA's Alaska North Slope operations. With regard to the 2012 Simpson Lagoon OBC seismic project, BPXA will present the data on marine mammal sightings and the results of the marine mammal monitoring and mitigation as part of our 90-day report to the regulatory authorities. We will present the results at the 2013 NMFS Open-Water Meeting, which is attended by representatives from the NSB DWM and AEWG membership, in Anchorage.