



August 29, 2022

**Via Electronic Filing**

Steve Cohn, State Director  
Bureau of Land Management, Alaska  
222 W. 7th Avenue, Stop #13  
Anchorage, AK 99513-7504

**Re: Bureau of Land Management; Willow Master Development Plan (MDP) Draft Supplemental Environmental Impact Statement (DSEIS); NEPA # DOI-BLM-AK-0000-2018-0004-EIS (July 8, 2022)**

Dear State Director Cohn:

The U.S. Chamber of Commerce (“Chamber”) appreciates the opportunity to comment on the Willow Master Development Plan (MDP) Draft Supplemental Environmental Impact Statement (DSEIS) proposed on July 8, 2022.

The Chamber represents members in every sector of the economy who all depend on affordable and reliable energy sources. ConocoPhillips' proposed Willow project, and development of the National Petroleum Reserve – Alaska (NPR-A) generally, represent a crucial addition to U.S. energy security, providing significant additional domestic energy under some of the strictest environmental standards in the world. As such, the Chamber supports the Bureau of Land Management’s (BLM) proposed Supplemental EIS for the Willow project and encourages it to adopt Alternative E without delay.

**Energy Security**

Development of the Willow project represents a critical opportunity to increase U.S. energy security by adding an additional source of domestic oil production. BLM estimates, Willow will produce an estimated 180,000 barrels of oil per day at its peak. Moreover, throughput for the Trans-Alaska Pipeline System (TAPS) has been declining for over a decade, increasing the risk that it will fall below the required amount necessary to continue operating and supplying oil to the rest of the U.S., especially West Coast refineries. The estimated production rate from Willow will increase the current TAPS throughput by 20% and ensure its long-term viability.

Additionally, Russia’s illegal and unprovoked invasion of Ukraine has diminished the energy security of the U.S. and our allies. Europe and Asia are preparing for a winter heating season with far less Russian energy imports, driving up prices to unprecedented levels and threatening physical supplies of energy commodities. This situation highlights the importance of increased and reliable production of oil and natural gas from the United States as a geopolitical foil to Russia’s use of energy exports in an attempt to undermine global support for Ukraine and its defense. As one of the largest exporters of petroleum in the world, the United States’ ability to facilitate global diversification from Russian energy will be enhanced by the Willow project.

## ECONOMIC & ENVIRONMENTAL BENEFITS

BLM's DSEIS estimates development of the Willow project could generate between \$8 and \$17 billion in new revenue for the federal government, the State of Alaska, and communities in and adjacent to NPR-A. BLM further estimates Willow will provide between \$1.3 and \$5.2 billion in State of Alaska revenue from production, property, and income taxes and over \$1.2 billion in North Slope Borough (NSB) revenue from property taxes. Additionally, Willow is expected to create as many as 2,000 jobs during construction.

Global oil markets are expected to remain tight for the foreseeable future, and global oil demand is projected to remain strong in the long term. Oil supply from Willow will provide some of the most technologically advanced and environmentally and socially responsible barrels produced in the world, providing a net reduction in greenhouse gasses as it displaces overseas imports with higher greenhouse gas intensity. The International Energy Administration estimates that the methane intensity of oil and gas production in Russia is 30 percent higher than in the United States. Emissions in Iran are 85% higher for each unit of energy produced, and Venezuela is off the charts at 652% higher.<sup>1</sup>

## TIMELINESS

The Willow project has undergone nearly five years of rigorous regulatory review and environmental analysis, including extensive scientific analysis. The Draft Supplemental Environmental Impact Statement provides a new Alternative (Alt E) developed by BLM and cooperating agencies in consultation with stakeholders in response to the decision in August 2021, by the U.S. District Court for Alaska, remanding BLM's previous DEIS to BLM. Alt E represents a good path forward for the Willow project and significantly reduces surface impacts.

The Chamber supports BLM's effort to narrowly focus the DSEIS on the issues raised by the remand decision. The DSEIS's development of a new "Alternative E: Three-Pad Alternative (Fourth Pad Deferred)" ("Alternative E") directly and adequately addresses the court order. The draft supplemental EIS is extensive and thorough at over 400 pages long.<sup>2</sup> There has been extensive public involvement, including more than five public comment periods, 215 days of public comment, a public scoping period, and 25 public meetings.

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<sup>1</sup> Greater U.S. Energy Production Is Needed to Reduce Reliance on Authoritarian Regimes, Global Energy Institute, Dan Byers, April 5, 2022, <https://www.globalenergyinstitute.org/greater-us-energy-production-needed-reduce-reliance-authoritarian-regimes>

<sup>2</sup> Willow Master Development Plan, Draft Supplemental Environmental Impact Statement, Bureau of Land Management, July 2022, [https://eplanning.blm.gov/public\\_projects/109410/200258032/20063228/250069410/Vol%201\\_Willow%20Draft%20Supplemental%20EIS\\_July%202022.pdf](https://eplanning.blm.gov/public_projects/109410/200258032/20063228/250069410/Vol%201_Willow%20Draft%20Supplemental%20EIS_July%202022.pdf).

Accordingly, the Chamber encourages BLM to finalize the Willow Project without further delay to avoid additional increases to development costs and potentially cause the project to miss loss of another construction season.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Guith". The signature is fluid and cursive, with a large initial "C" and a stylized "G".

Christopher Guith  
Senior Vice President  
Global Energy Institute  
U.S. Chamber of Commerce