

June 16, 2022

The Honorable Debra Haaland, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, D.C. 20240

Dear Secretary Haaland,

As leaders of conservation and climate organizations representing millions of members across the nation, we write today to express our considerable concern over the speed of the Department of the Interior's (DOI) permitting process for ConocoPhillips' Willow Master Development Project in America's Western Arctic. The scale and consequences of this project are immense: No single oil and gas project has more potential to set back your administration's climate and public lands protection goals than the Willow Project. It will be difficult to achieve your climate goals if this project moves forward. We ask for your leadership and support in taking a careful and comprehensive review of this significant decision to ensure it meets this administration's commitments to science, addressing the climate crisis, and protecting public lands and subsistence rights.

Willow is the single largest oil extraction project proposed on federal lands, estimated to add more than 250 million metric tons of CO₂ to the atmosphere over the next 30 years—equivalent to the annual emissions from 66 coal fired power plants (roughly 1/3 of all U.S. coal plants). A recent study by the [Center for American Progress found that the Willow Project would erase the climate benefits of renewable energy that this administration has promised on public lands and waters by 2030](#). To be certain, the decision whether to approve the Willow Project is a legacy decision for your administration.¹

Through a piecemeal approach that downplays the true impacts, ConocoPhillips is creating an expansive spider web of industrialization across the region. Even the Trump administration, which prioritized approving this project no matter the harm, acknowledged there would be major impacts to subsistence users, the nearby community of Nuiqsut, and other resources in the region.² The Willow Project will provide ConocoPhillips the master hub needed for future industrialization of the fragile Arctic.³ While ConocoPhillips may try to appease the administration by seeking a permit for a smaller-scale version of the project, for now, even a scaled-down Willow Project will have catastrophic climate implications and both history and ConocoPhillips' own plans indicate it will only continue to expand development even further. Accordingly, we ask the administration to not rush its permitting and to ensure it carefully analyzes the full range of impacts from this damaging project.⁴

¹ BLM appears to be moving quickly toward a new permitting decision for Willow. It has stated that it intends only to address the analytical problems identified by the Alaska district court, not any other shortcomings associated with the Trump administration's review. It is preparing only a narrow supplemental Environmental Impact Statement to support a new decision responsive to the court's opinion, rather than a more robust assessment of the project's implications regarding the administration's climate and biodiversity objectives.

While we appreciate the agency's attention to its permitting responsibilities, it must take the time to thoroughly reassess this dangerous proposal, including its purpose, need, reasonable alternatives, and impacts thereof.

² Bureau of Land Mgmt., Willow Master Development Plan: Final Environmental Impact Statement app. G at 23-26 (2020).

³ ConocoPhillips has "*identified up to 3 billion barrels of oil equivalent of nearby prospects and leads with similar characteristics that could leverage the Willow infrastructure...this offers significant long-term upside to this project*" (p. 10), "*next great Alaska hub*" (p. 9) Nick Olds, Senior Vice President for Global Operations. (p. 10) <https://static.conocophillips.com/files/resources/2021-jun-30-cop-n-139276042438-transcript.pdf>

⁴ The Alaska District Court rejected the argument that ConocoPhillips' has the "unfettered" right to extract oil from its leases and that in making this assumption, BLM is failing to exercise its authority to restrict development to ensure compliance with statutory mandates to protect surface resources and values. *Sovereign Inupiat for a Living Arctic v. Bureau of Land Mgmt.*, 555 F. Supp. 3d 739, 768-69 (D. Alaska 2021).

It is relevant to note that temperatures in Alaska's Arctic are rising at three to four times the rate of the rest of the world and the effects are already leading to destabilizing effects such as infrastructure damage and loss due to permafrost thaw. On March 4th, ConocoPhillips detected a natural gas blowout at its Alpine field, located just east of the proposed Willow Project. It removed 300 personnel in the wake of the leak, but insisted that the neighboring village of Nuiqsut was safe. Many families decided to leave the village because they did not believe the company's assurances that they were safe.⁵ ConocoPhillips' incident report indicated that thawing permafrost played a role in the severity of the leak, raising questions about the implications that thawing permafrost and climate change will have on the Willow Project's design.⁶ The Alaska Oil and Gas Conservation Commission is currently investigating the accident, and the investigation very well could reveal additional concerns that should be addressed before proceeding with the Willow permitting process.

We implore you and your department to slow down the permitting of the Willow Master Development Project and take a careful and comprehensive review of the climate and conservation consequences. Approving ConocoPhillips' Willow Project will define your legacy. As Secretary of the Interior and a strong advocate for climate reform and the protection of our nation's treasured public lands, we hope that you will ensure that the public process and permitting decision are consistent with this administration's commitments and objectives.

We thank you for your consideration and attention to this important issue.

Sincerely,



Enei Begaye
Native Movement, Executive Director



Dan Chu
Sierra Club, Acting Executive Director



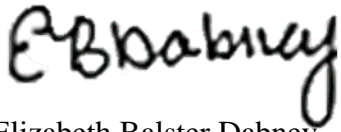
Jamie Rappaport Clark
Defenders of Wildlife, President and CEO

⁵ Gas leak at Conoco Phillips Alaskan drilling site forces some to leave, The Washington Post, 3/10/22 <https://www.washingtonpost.com/climate-environment/2022/03/10/gas-leak-willow-conoco-phillips/>;
Surrounded by Oil Fields, an Alaskan Village Fears for Its Health, Inside Climate News, 8/2/2018, <https://insideclimatenews.org/news/02082018/alaska-north-slope-oil-drilling-health-fears-pollution-risk-native-village-nuiqsut/>

⁶ Alaska Project would use "Chillers" to Freeze Thawing Tundra, Bloomberg Law, 8/14/2020, <https://news.bloomberglaw.com/environment-and-energy/alaska-oil-project-would-use-chillers-to-freeze-thawing-tundra>



Victoria Clark
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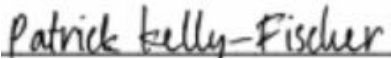
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