

Delbert Rextord
Comment made orally at Public Hearing
in Barrow Alaska March 18 2010

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Tribal Government-to-Government Consultation-Shell Chukchi OCS Air Permit

For the record, my name is Delbert J. Rextord, first and foremost an Inupiaq from Alaska's Arctic Slope. Father of 9 children, grandfather of 16 grandchildren, a Barrow Whaling Captain, member of the Barrow Whaling Captain's Association, signatory to self-regulations under the AEWG Bowhead Subsistence Management Plan, a descendant of aboriginal whalers from Siberia and Alaska, Barrow, Point Hope and great grandson of a Yankee Whaler, namely Fred Hopson of Liverpool, England...in essence, I am and continue to be dependent on the Beaufort and Chukchi Seas to sustain my Inupiat cultural identity as an aboriginal whaling captain and whaler.

Today, I have the honor and privilege of serving on the Inupiat Community of the Arctic Slope Regional Tribal Council as an At-Large Tribal Council Member. I am employed by Ukpeagvik Inupiat Corporation in the capacity of Land Chief charged with planning and implementing land use policies on behalf of over 2200 shareholders of record.

As Inupiat people we have a profound vested interest in the sustainable harvest of all natural renewable resources within the Chukchi and Beaufort Sea and arctic waters. I respectfully request the United States Government Environmental Protection Agency to minimize the impacts of air pollution into our arctic environment and cumulative effects of global warming within all Arctic communities across the circumpolar arctic. As acknowledged by the Alaska Eskimo Whaling Commission, Inupiat Community of the Arctic Slope and North Slope Borough joint statement dated 17 February, 2010 "...we want to acknowledge the following improvements:

Significant Emissions Reductions: 41% Carbon Monoxide; 39% Nitrogen Oxides; over 70% Particulate Matter; 99% Sulfur Oxide and 48% Volatile Organic Compound Matter.

Transparency: EPA has provided a timely and transparent set of records on this permit action for us to review and better understand the proposed action in the Statement of Basis.

Source Testing: EPA's comprehensive source testing requirements allow for the collection of necessary data and demonstrate a commitment to human health and welfare in Alaska's North Slope.

Monitoring, Recordkeeping and Reporting: EPA has included a very comprehensive set of monitoring, recordkeeping and reporting requirements.

BACT/Emission Control: EPA has worked consistently with Shell to examine the best available control technology (BACT) and to substantially improve emission controls on Shell's operations. While there are still some unresolved issues (as indicated below), EPA has done an excellent job in requiring the reduction of emissions, ensuring the installation of emission controls, and providing for source testing, monitoring and record keeping.

Relief Wells: EPA's Statement of Basis (SOB) requires Shell to include time spent drilling relief wells in the 168-day permit period. This is an important requirement as our position has consistently been the blowouts are a reasonably foreseeable event.

In light of the above noted emission reductions by Shell we are concerned for our Inupiat Peoples future welfare in the event of a major oil spill while the industry conducts exploration drilling and production operations within the Chukchi Sea now and into the unforeseeable future. We strongly encourage EPA to place the most stringent regulatory conditions and stipulations on future oil and gas exploration and production in the Chukchi Sea. We as Inupiat Peoples are very concerned for maximizing protections of our highly sensitive arctic environment from future industrial emissions into our atmosphere.

Thank you for the opportunity to speak on this very important subject matter with your agency staff.