

July 15, 2024

**VIA ELECTRONIC MAIL (ITP.Davis@noaa.gov)**

Jolie Harrison, Chief  
Permits and Conservation Division  
Office of Protected Resources  
National Marine Fisheries Service

Re: Proposed Takes of Marine Mammals Incidental to Specified Activities; Taking Marine Mammals Incidental to Furie Operating Alaska, LLC Oil and Gas Activities in Cook Inlet, Alaska (89 Fed. Reg. 51102)

Dear Ms. Harrison:

Friends of Animals,<sup>1</sup> on behalf of the organization and our members worldwide, submits the following comments in response to the National Marine Fisheries Service's (NMFS or NOAA Fisheries) Notice on *Takes of Marine Mammals Incidental to Specified Activities; Taking Marine Mammals Incidental to Furie Operating Alaska, LLC Oil and Gas Activities in Cook Inlet, Alaska*.<sup>2</sup> In addition to the proposed issuance of two consecutive IHAs for Level A and B harassment under the Marine Mammal Protection Act (MMPA), there is a possible, 1-year renewal that could be issued for either or both of the IHAs. FoA requests that NMFS deny the incidental harassment authorizations (IHAs) and any renewals. Issuance by NMFS of the two consecutive IHAs and any renewals to Furie Operating Alaska, LLC (Furie) to continue activities in Cook Inlet will violate the Marine Mammal Protection Act (MMPA) and is inconsistent with the recommendations of the Recovery Plan for the species. We urge NMFS to deny Furie's application and to complete its development of an analysis on the cumulative effects of anthropogenic activities and threats of high concern to enhance the recovery efforts for Cook Inlet beluga whales.

## **DISCUSSION**

### **A. Cook Inlet beluga whales are far from recovery.**

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<sup>1</sup> Friends of Animals is an international nonprofit advocacy organization, incorporated in the state of New York since 1957. With tens of thousands of members worldwide, FoA advocates for animals both free-living and domestic. FoA has commented on numerous federal actions regarding Cook Inlet marine mammals and Cook Inlet beluga whales.

<sup>2</sup> Takes of Marine Mammals Incidental to Specified Activities; Taking Marine Mammals Incidental to Furie Operating Alaska, LLC Oil and Gas Activities in Cook Inlet, Alaska, 89 Fed. Reg. 51102 (June 28, 2024).

Cook Inlet beluga whales (*Delphinapterus leucas*) are critically endangered and have faced ongoing staggering declines for decades. The loss of even one Cook Inlet beluga whale should be considered devastating to the current population, as well as to the recovery of this magnificent species. As Cook Inlet belugas are a NOAA “species in the spotlight,”<sup>3</sup> and due to lengthy historical management of the species, NMFS is familiar with the significant risks and barriers to the survival of these world-renowned beings. After the finalization of the Recovery Plan in December 2016,<sup>4</sup> and a Species in the Spotlight 2021-2025 Priority Action Plan for the Cook Inlet beluga whale<sup>5</sup> in place, NMFS should emphasize greater measures to enhance the survival of the species and address a needed reduction of anthropogenic activities within the Cook Inlet. Doing so will support recovery efforts while eliminating long-term harassment and further endangerment to the species.

While the population estimate for Cook Inlet belugas has risen from between 250 and 317 in 2018, to between 290 and 386 in 2022, with a median estimate of 331 via aerial surveying and photo identification, the stability of this increase is uncertain.<sup>6</sup> Prior population declines of 2.3% between 2008-2018 remain to be suspected as a result of a multitude of anthropogenic factors and unprecedented weathering events including heatwaves.<sup>7</sup> Therefore, a population of 331 individuals is not a significant improvement from the overall decline of 75% from the estimated population size of 1,300 in 1979.<sup>8</sup>

Despite this critical time for monitoring population trends, NOAA Fisheries has delayed aerial surveying of the species from June 2024, until June 2025, due to less aggregation of the whales in places they previously and regularly have been observed.<sup>9</sup> Authorization of further take of the species without performing consistent surveying methods is especially concerning since the resident population is known for behavioral congregation patterns, such as for feeding and reproduction.<sup>10</sup>

<sup>3</sup> NOAA Fisheries, *Beluga Whale: In the Spotlight*, <https://www.fisheries.noaa.gov/species/beluga-whale/spotlight>, (last visited July 12, 2024).

<sup>4</sup> NMFS, *Recovery plan for the Cook Inlet beluga whale (Delphinapterus leucas)*, (December 2016), <https://repository.library.noaa.gov/view/noaa/15979> (“Recovery Plan”).

<sup>5</sup> NOAA Fisheries, *Species in the Spotlight Priority Actions 2021-2025, Cook Inlet Beluga Whale* (March 2021), [http://media.fisheries.noaa.gov/2021-04/SIS%20Action%20Plan%202021\\_Cook%20Inlet%20Beluga-FINAL%20508.pdf](http://media.fisheries.noaa.gov/2021-04/SIS%20Action%20Plan%202021_Cook%20Inlet%20Beluga-FINAL%20508.pdf).

<sup>6</sup> NOAA Fisheries, *New Abundance Estimate for Endangered Cook Inlet Beluga Whales* (June 15, 2023), <https://www.fisheries.noaa.gov/feature-story/new-abundance-estimate-endangered-cook-inlet-beluga-whales>.

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

<sup>9</sup> NOAA Fisheries, *NOAA Fisheries to Delay New Aerial Survey for Cook Inlet Beluga Whales Until June 2025* (June 14, 2024), <https://www.fisheries.noaa.gov/feature-story/noaa-fisheries-delay-new-aerial-survey-cook-inlet-beluga-whales-until-june-2025>.

<sup>10</sup> NOAA Fisheries, *Species in the Spotlight Priority Actions 2021-2025, Cook Inlet Beluga Whale* (March 2021), [http://media.fisheries.noaa.gov/2021-04/SIS%20Action%20Plan%202021\\_Cook%20Inlet%20Beluga-FINAL%20508.pdf](http://media.fisheries.noaa.gov/2021-04/SIS%20Action%20Plan%202021_Cook%20Inlet%20Beluga-FINAL%20508.pdf) (March 2021).

Moreover, there are already a prominent number of authorizations throughout the Cook Inlet allowing for the take of Cook Inlet beluga whales. Between 2017 and 2025, NMFS authorized approximately 120,000 incidental takes of Cook Inlet beluga whales.<sup>11</sup>

### **B. Issuance of the IHAs will violate the MMPA and exacerbate noise in the Cook Inlet.**

The MMPA was enacted in response to Congressional concern that “certain species and population stocks of marine mammals are, or may be, in danger of extinction or depletion as a result of man's activities.”<sup>12</sup> Under the MMPA, it is unlawful to take any marine mammal unless as permitted by statutory exception.<sup>13</sup> Take is defined as “to harass, hunt, capture, or kill, or attempt to harass, hunt, capture, or kill any marine mammal.”<sup>14</sup>

Under the MMPA, citizens are only allowed to take “small numbers of marine mammals of a species or population stock” for less than “five consecutive years each” if such taking: (1) will have a negligible impact on such species or stock; and (2) will not have an unmitigable adverse impact on the availability of such species or stock for taking for subsistence uses.<sup>15</sup> In order to determine whether a take is negligible, NMFS should consider the potential cumulative impact from past, current, and future activities and their impact on the environmental baseline.

The potential Level B impacts that Furie’s proposed project will have on the species are varied and numerous. They include hearing impairment, separation of family groups, loss of prey and/or habitat, disturbances to biologically sensitive feeding and mating areas, bodily harm, behavioral changes, and synergistic and/or cumulative effects, amongst others. For these reasons, the numerous negative effects on marine mammals do not constitute negligible impacts, and therefore, Furie does not meet the qualifications for obtaining an IHA under the MMPA. Further, NMFS should extend its public comment period to at least one month to obtain adequate public findings before the issuance of consecutive IHAs.

The proposed IHAs would allow for the take of 11 beluga whales, or 3%, of the Cook Inlet population per year for a total of up to two consecutive years.<sup>16</sup> Therefore, Furie is proposing to take at least 22 or 6% of beluga whales if NMFS approves the IHAs. Notably, the Marine Mammal Commission 2018 Stock Assessment states, “even one take

<sup>11</sup> Migura, M. & Bollini, C., *To take or not take? Examination of the status quo process for issuing take authorizations of endangered Cook Inlet beluga whales and implications for their recovery*, 4 Conservation Science and Practice e590 (2021).

<sup>12</sup> 16 U.S.C. § 1361(1).

<sup>13</sup> 16 U.S.C. § 1371(a).

<sup>14</sup> 16 U.S.C. § 1362(13).

<sup>15</sup> 16 U.S.C. § 1371(a)(5)(A)(i)(I).

<sup>16</sup> 89 Fed. Reg. 51102 (June 28, 2024).

every two years may still impede recovery.”<sup>17</sup> Indeed, the estimated number of takes is indefinite and based on the vast amount of harmful impacts that Furie’s proposed project would add to the existing anthropogenic activities within the Cook Inlet, the actual number of takes is likely to be higher.

Noise remains one of the highest threats to Cook Inlet beluga whales. The proposed IHAs would allow for varied tugging and positioning activities for “approximately 20-25 hours over 2 days at the beginning and end of the drilling season” in both years.<sup>18</sup> However, NMFS describes that the various noise impacts from the towing activities required are “less well documented,” and that “NMFS is still in the process of developing analyses of the impact that non-quantitative contextual factors have on the likelihood of Level B harassment occurring, and the nature and duration of the particular tug activities analyzed here.”<sup>19</sup> Additionally within the proposed timeline, “*up to two conductor pipes may be driven into the seabed with an impact hammer*,” although which years or months are undetermined in Furie’s request.<sup>20</sup> Thus, NMFS cannot accurately conclude that the noise and any sound disturbance from the proposed project will have a negligible or reversible impact on the belugas.

Cook Inlet beluga whales possess sensitive hearing and a reliance on acoustic communication, making them particularly vulnerable to the disruptive effects of anthropogenic noise, even within long ranges.<sup>21</sup> Impairment of their hearing from intense and ongoing noise exposure can disorient their sense of direction, negatively impacting their ability to communicate, navigate, forage, locate prey, and avoid predators.<sup>22</sup>

NMFS acknowledges in its Recovery Plan that anthropogenic noise from drilling for oil and gas, pile driving, dredging, tugboats, and even surveillance helicopters pose high risks of interfering with the beluga’s recovery.<sup>23</sup> NMFS additionally acknowledges that masking of calls and vocalizations is also consequential to commercial shipping activities.<sup>24</sup> Only recently, in 2023, NMFS found that Cook Inlet belugas have forty-one

<sup>17</sup> Marine Mammal Commission, *Alaska Marine Mammal Stock Assessments, Cook Inlet Stock* at 112 (2018), <https://www.mmc.gov/wp-content/uploads/2018-Alaska-SAR-Cook-Inlet-Beluga-Whale.pdf>.

<sup>18</sup> 89 Fed. Reg. 51102, 51113.

<sup>19</sup> *Id.*

<sup>20</sup> *Id.*

<sup>21</sup> Recovery Plan at II-52.

<sup>22</sup> NOAA Fisheries, *Vocal Repertoire of Cook Inlet Beluga Whales Documented for the First Time* (December 11, 2023), <https://www.fisheries.noaa.gov/feature-story/vocal-repertoire-cook-inlet-beluga-whales-documented-first-time>.

<sup>23</sup> Recovery Plan at III-13.

<sup>24</sup> Castellote, et al., *Anthropogenic Noise and the Endangered Cook Inlet Beluga Whale, Delphinapterus leucas: Acoustic Considerations for Management*, 80 Marine Fisheries Review 63–88 (2019), [https://www.researchgate.net/publication/333356584\\_Anthropogenic\\_Noise\\_and\\_the\\_Endangered\\_Cook\\_Inlet\\_Beluga\\_Whale\\_Delphinapterus\\_leucas\\_Acoustic\\_Considerations\\_for\\_Management](https://www.researchgate.net/publication/333356584_Anthropogenic_Noise_and_the_Endangered_Cook_Inlet_Beluga_Whale_Delphinapterus_leucas_Acoustic_Considerations_for_Management).

calls.<sup>25</sup> Each of the most utilized calls were identified as compromised or entirely masked by shipping activities.<sup>26</sup> The Cook Inlet is *already* “naturally noisy, complex, and dynamic,” due to a variety of natural sources.<sup>27</sup> This natural baseline only raises the “potential for negative effects when anthropogenic sources of noise are introduced into the inlet.”<sup>28</sup>

### **C. Noise and cumulative effects present significant harming to Cook Inlet beluga whales.**

The Recovery Plan also addresses cumulative impacts at length, stating that, “Although individual activities may be deemed insignificant when considered independently, creeping normality (e.g., death by a thousand cuts) can cause substantial adverse effects to nearly any entity, including [Cook Inlet] belugas, at both individual and population levels.”<sup>29</sup> Furthermore, although “[a]pplications for Incidental Harassment Authorizations (IHAs) historically have been reviewed on the basis of an individual activity in isolation . . . the high level of human activity in Cook Inlet has increased such that cumulative effects of multiple activities must be appropriately accounted for.”<sup>30</sup> NMFS’s rhetoric in this document, as well as in others, establishes its high-priority concern for Cook Inlet belugas and the effects of cumulative impacts and noise on this population.

Despite this establishment of high concern, the cumulative effects of numerous threats have remained shockingly under-studied. To prevent further decline of the species, NMFS should not stray from conducting a more comprehensive assessment of the cumulative effects related to noise, habitat degradation, chemical exposure, mortality, stranding, climate change, and migration of the species and its prey.

The synergistic effects of toxic chemical exposure and noise are particularly concerning in coastal areas where pollutants are concentrated, and in areas heavy with potential spillage, engine leaks, and consistent vessel traffic. Despite consideration of the possible negative impacts, little has been researched on this as a cumulative threat. While the 2021-2025 Recovery Action Plans initiated analysis of “emerging contaminants of concern,” including “energetic content, contaminants, stable isotopes, and fatty acids,” in prey in 2017, an expansion of the studies related to the bioaccumulation of toxins and cumulative effects will further lead to an improved understanding of the cumulative effects harming beluga whales. Despite consideration of the possible negative impacts, little has been researched on this as a cumulative threat. While in vivo research in

<sup>25</sup> NOAA Fisheries, *Vocal Repertoire of Cook Inlet Beluga Whales Documented for the First Time* (December 11, 2023), <https://www.fisheries.noaa.gov/feature-story/vocal-repertoire-cook-inlet-beluga-whales-documented-first-time>.

<sup>26</sup> *Id.*

<sup>27</sup> Recovery Plan at III-10.

<sup>28</sup> Recovery Plan at III-11.

<sup>29</sup> Recovery Plan at VI-30.

<sup>30</sup> *Id.*

belugas has not been conducted yet, it has been pointed to as necessary to consider, as recent studies in mammals, including humans, have confirmed that noise and exposure to specific organic solvents have negative and synergistic physiologic impacts.<sup>31</sup>

### Conclusion

Until NMFS establishes clarity that Cook Inlet beluga whales are on a successful path to recovery, Friends of Animals requests that NMFS deny the IHAs and reconsider any permits that allow for incidental take of critically endangered Cook Inlet beluga whales.

FoA supports the creation of annual programmatic EAs, an annual permitting cycle, and the overall analysis of cumulative effects from multiple IHAs. However, FoA urges NMFS to cease issuing IHAs for Cook Inlet beluga whales and marine mammals altogether until threats of high concern to Cook Inlet marine mammals can be better understood and addressed, through both continued research and action initiatives. Continuous granting of incidental take permits and IHAs for anthropogenic activities by federal agencies diminishes the recovery and survivability of this group of beluga whales. It is also inconsistent with the purposes of the Marine Mammal Protection Act. The Cook Inlet belugas' seemingly stagnant population growth cannot withstand further loss, let alone be subject to more potential takes.

Respectfully submitted,

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<sup>31</sup> Recovery Plan at III-8 (citing Peter Steyger, *Potentiation of chemical ototoxicity by noise*, 30 Seminars in Hearing 38-36 (2009)).





July 12, 2024

Ms. Jolie Harrison  
Chief, Permits and Conservation Division  
Office of Protected Resources  
National Marine Fisheries Service  
1315 East-West Highway  
Silver Spring, Maryland 20910

**Re: Proposed Incidental Harassment Authorization for Furie Operating Alaska, LLC  
Natural Gas Activities in Cook Inlet, Alaska**

Ms. Harrison,

Furie Operating Alaska, LLC (Furie) submits this letter in response to the National Oceanic and Atmospheric Administration, National Marine Fisheries Service's (NOAA Fisheries') 14 June 2024 notice, and 28 June 2024 revision of two proposed consecutive incidental harassment authorizations (IHAs) to incidentally take marine mammals during the specified activities (Notice) (89 Fed. Reg. 51102 and 89 Fed. Reg. 53961). We submitted our final application requesting the IHAs for the planned natural gas production activities in Cook Inlet in 2024 and 2025 in October 2023. We appreciate the constructive dialog we've had with NOAA Fisheries and your considered evaluation of our planned activities. Furie's planned natural gas production activities are critically important to Alaska's residents, businesses, and national security amid our state's widely publicized energy shortage expected in the next few years.

Our comments below are intended to clarify, provide additional context, and inform your evaluation of our application.

1. The Notice characterizes our planned activities as "oil and gas activities." Furie only produces natural gas in Cook Inlet and is not planning to drill for or produce oil. The wells planned during the activities target proven natural gas reserves and will not intersect oil-bearing formations. Furie recommends revising the proposed IHA and the Notice to refer to the planned activities as "natural gas production activities."
2. The Notice includes language adapted from our application (finalized in October 2023), in which we stated that it was our understanding that Hilcorp Alaska, LLC (Hilcorp) did not intend to operate Enterprise 151 at the Tyonek platform in 2024 and 2025. In subsequent discussions with Hilcorp regarding a potential hand-off of the rig, we realized that our understanding was incorrect. In meetings and emails with NOAA Fisheries in February and March of 2024, we clarified that Hilcorp *did intend* to operate the jack-up rig at the Tyonek platform and provided additional information to amend our planned activities to include towing the rig from the Tyonek platform to Furie's Julius R. Platform (JRP). Furie recommends removing statements characterizing Hilcorp's intent not to operate at the Tyonek Platform.

3. The Notice describes Furie’s planned activities as taking place in “...an otherwise non-industrial setting for a period of several days.” Oil and gas platforms have operated in this area of Cook Inlet for 60 years with daily activity. Similarly, Furie will tow the jack-up rig in shipping lanes that are transited nearly every day, often several times per day, by commercial ships, offshore supply vessels, and tugs and barges. It is incorrect to characterize the project area as a “non-industrial setting.”
4. The Notice states: “*Furie’s proposed activities could have localized, temporary impacts on marine mammal habitat, including prey, by increasing in-water sound pressure levels, for pile driving, slightly decreasing water quality.*” And: “*The total seafloor area likely impacted by the pile driving associated with the project is relatively small compared to the available habitat in Cook Inlet.*” Furie plans to install the conductors inside the caisson monopod leg of the JRP platform. Therefore, no area of the seafloor will be impacted by pile driving and will not cause a decrease in water quality. If the intention is to discuss the potential decrease in habitat quality resulting from the sound pressure, Furie recommends revising the statements as follows: “*Furie’s proposed activities could have localized, temporary impacts on marine mammal habitat, including prey, by increasing in-water sound pressure levels, ~~for pile driving, slightly decreasing water quality.~~*” And: “*The total ~~seafloor~~ habitat area likely impacted by the pile driving associated with the project is relatively small compared to the available habitat in Cook Inlet.*”
5. In sections 1.1.2.1, 6.2.3, and 6.3.3 of Furie’s application, we referred to the 2015 data analysis conducted by the U.S. Navy: “*Proxy Source Sound Levels and Potential Bubble Curtain Attenuation for Acoustic Modeling of Nearshore Marine Pile Driving at Navy Installations in Puget Sound*” as containing the best available data to approximate the sound source levels (SSLs) for the impact installation of 20-inch conductors. Specifically, we proposed, and NOAA Fisheries accepted, the use of the data for the impact installation of a 24-inch pile presented in that document. The 2015 U.S. Navy document lists a sound exposure level (SEL) of 181 decibels (dB) for this activity. In the NOAA Fisheries-supplied User Spreadsheet, we correctly used the 181 dB SEL to estimate the Level A isopleths for this activity. However, we incorrectly stated the proxy SEL as 184 dB in Sections 1.1.2.1, 6.2.3, and 6.3.3. The 2015 U.S. Navy document lists the 184 dB SEL as applicable to 24-inch, 30-inch, and 36-inch piles collectively but 181 dB SEL as specifically applicable to 24-inch piles. In Table 7 of the Notice and the corrected Notice (issued 28 June 2024, 89 FR 53962), NOAA Fisheries listed the SEL as 184 dB rather than 181 dB. In Table 10 of the corrected Notice, the Level A zones for 70 percent of the conductor pipe pile installation range from 109 meters (mid-frequency cetaceans) to 3,650 meters (high-frequency cetaceans), based on an SEL of 184 dB. In the User Spreadsheets supplied in Appendix A of Furie’s application, the Level A zones ranged from 39 meters (mid-frequency cetaceans) to 1,309 meters (high-frequency cetaceans) based on an SEL of 181 dB.

We acknowledge our mistake in the application text. However, rather than requesting NOAA Fisheries to change the SEL from 184 dB to 181 dB, and recalculate the Level A zones and take estimates, we propose to retain the 184 dB SEL as the “best available” SSL to estimate Level A isopleths for impact installation of conductor pipe piles ranging from 20 inches to 36 inches in diameter. Consequently, we suggest that the Level A zones



calculated by NOAA Fisheries, as presented in Table 10 of the corrected Notice, and the resulting estimate of Level A take represent valid analyses for conductors up to 36 inches. By retaining our mistake, NOAA Fisheries' analysis would encompass all conductor sizes available to Furie, should we choose to use larger conductors in our wells.<sup>1</sup> It should be noted that the 2015 U.S. Navy document lists a root mean square sound pressure level ( $SPL_{rms}$ ) of 193 dB, for piles ranging from 24 to 36 inches in diameter (refer to Table 2-1 in U.S. Navy 2015). Therefore, the  $SPL_{rms}$  used to calculate the Level B zone of 1,585 meters and the estimate of Level B take would remain unchanged. It is also worth restating that because the conductors will be installed within the monopod leg of the platform, some attenuation is expected when compared to open-water installation. Since no attenuation factor has been applied, the proxy SSLs used will likely overestimate the actual sound levels transmitted to the waters adjacent to the platform and the Level A and B take.

6. The Notice states, “*Site-specific TL (transmission loss) data for pile driving at the JRP site are not available.*” This is not entirely accurate. Furie contracted with JASCO Applied Sciences during the 2015 installation of the JRP to conduct a sound source verification (SSV) to evaluate the impact installation of the 42-inch pin piles that hold the JRP in place (cited as Austin et al. 2015 in Section 6.2.3 of Furie’s application). The calculated transmission loss was 20.3 dB per decade. Because the hammer is rated at four times the energy of the one planned for use at the JRP and because it was for the installation of 42-inch piles, Furie did not view it as a suitable proxy for the SSLs for the installation of the conductor pipes inside the monopod leg of the platform. We acknowledge that many factors affect transmission loss, including the frequencies of the predominant sound energy emanating from the piles as they are impacted, which may vary with pile size and impact energy. However, the other factors affecting transmission loss, such as bathymetry, depth, salinity, and temperature, *are* “site-specific” and are relevant to Furie’s planned installation of conductors. As stated in the application, the use of a 15 dB per decade transmission loss likely overestimates the Level A and Level B isopleths and the degree of incidental take.
7. In Table 13 of the Notice, the “best” estimate of Cook Inlet beluga abundance ( $N_{best}$ ) is listed as 279 in the third column of the table. The estimated take as a percentage of stock abundance is listed as 3.9 percent in columns five and seven. However, the fourth footnote contradicts the table, describing the most recent abundance ranging from 290 to 386, with a best estimate of 331 animals, citing Goetz et al. 2023 as the source. The footnote also describes the authorized take as 3.3 percent of the stock rather than the 3.9 percent listed in the table. Furie believes that the estimate in Goetz et al. 2023 is the best available data and recommends a revision of the table to align with the information provided in the footnote.

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<sup>1</sup> As others have commented on similar notices for incidental take (e.g., 87 FR 62369), Furie’s planned activities are permitted by other state and federal regulations and agencies. NOAA Fisheries does not “authorize” or deny the planned activities themselves.



Finally, Furie is the only Alaskan-owned natural gas production company in Alaska. We live, work, and recreate in the Cook Inlet region and deeply appreciate the natural abundance of fish and marine mammals in our oceans. We strive to minimize our impact on the environment as we provide critical natural gas resources to our community. Furie applauds NOAA Fisheries' role in conserving the protected marine mammal and fish species that enhance the experience of visitors to and residents of Alaska. We also appreciate your considered analysis of our planned activities and the expeditious completion of the issuance of the requested IHAs.

Sincerely,

A handwritten signature in blue ink, reading 'Mark Slaughter', is written over a light blue horizontal line.

Mark Slaughter  
Chief Commercial Officer  
Furie Operating Alaska, LLC

cc: John L. Hendrix, President & CEO, Furie Operating Alaska, LLC

