

ALASKA WILDERNESS LEAGUE \* CENTER FOR BIOLOGICAL DIVERSITY \* CLEAN WATER ACTION  
\* DEFENDERS OF WILDLIFE \* EARTHJUSTICE \* ENVIRONMENT AMERICA \* FRIENDS OF THE  
EARTH \* GREENPEACE \* LEAGUE OF CONSERVATION VOTERS \* NATIONAL AUDUBON SOCIETY  
\* NATIONAL PARKS CONSERVATION ASSOCIATION \* NATURAL RESOURCES DEFENSE COUNCIL  
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FOR INTERNATIONAL ENVIRONMENTAL LAW \* THE WILDERNESS SOCIETY

January 9, 2013

Hon. Ken Salazar  
Office of the Secretary  
Department of the Interior  
1849 C Street, N.W.  
Washington, D.C. 20240

Re: Suspending Arctic Ocean oil and gas activities

Dear Secretary Salazar:

On behalf of our many millions of members and supporters, we request that you use your authority under the Outer Continental Shelf Lands Act and other laws to suspend all Arctic Ocean oil and gas activities for the foreseeable future. Your announced investigation of Shell's failures this year must consider not only how but whether to allow drilling offshore the Arctic. Shell's experience makes vividly clear that if Arctic Ocean drilling were allowed to continue, harsh conditions, extreme remoteness, unpredictable ice, and ordinary human error will result in serious accidents and could produce a major marine and coastal catastrophe.

Most recently, Shell repeatedly lost control of its *Kulluk* drill rig while using its "spectacular," purpose-built vessel to tow the rig from Dutch Harbor to Seattle. Despite substantial help from the Coast Guard, the *Kulluk* ran aground in an ecologically and culturally sensitive part of the Kodiak archipelago. Before the *Kulluk* was eventually towed to safety, massive public resources were diverted from other important missions to assist Shell. Had this event occurred in Arctic waters far from the Coast Guard station in Kodiak the risks to human life and the environment would have been even greater than they are now.

The *Kulluk* grounding is only the latest incident to show that Shell's much-touted equipment, planning, and management provide no assurance against the region's extreme elements and inevitable human missteps. Shell lost control of its other drill rig, the *Noble Discoverer* in a protected harbor, and that rig's operation is now under criminal investigation for potential safety and pollution violations. Shell's "state-of-the-art" spill response barge did not get timely Coast Guard certifications, and its "containment dome" failed spectacularly during testing in calm water. Even Shell's demobilization was plagued by weather and error-related delays. According to Shell's supporters, the company developed the best Arctic drilling program

ever crafted, but it nevertheless has had severe problems at every stage – from vessel construction to deployment, drilling operations, and transit.

Importantly, Shell’s accident-riddled effort is symptomatic of the grave risks that attend any drilling in Arctic waters. The company’s campaign, and the federal government’s approval of it, rest on a systematic misapprehension of these risks and the prospects for eliminating them. Shell initially led the Administration to believe the company could recover an astonishing 90% or more of the oil in the vicinity of a blowout, but eventually had to concede that it could only “encounter” that much oil in a response effort. The short operating season means that a relief well likely would need to be drilled in the Arctic’s icy waters faster than the industry has ever managed even in temperate waters, and no means exist for cleaning up oil once winter ice closes in. And even during this past summer’s “open water season” a massive ice floe forced Shell off its Chukchi Sea drill site within hours of initiating drilling. These and other intractable problems have led insurers and other business giants – including oil majors – to conclude that even from a strictly business standpoint, the extreme risks in working offshore in the Arctic Ocean swamp potential rewards.

The Department of the Interior has gone to extraordinary lengths to provide industry an opportunity to pursue oil and gas in the Arctic Ocean, even as it has appropriately recognized the region’s extraordinary and vulnerable natural environment. Yet, far more ably than its many critics, Shell has proven the folly of Arctic offshore drilling. Suspending Arctic oil and gas activities will provide the time to carefully reassess whether and how offshore drilling in the Arctic Ocean is possible or prudent. Ultimately, we believe that a fact-based and clear-eyed re-evaluation that takes into account Shell’s long series of accidents, near-misses, and reversals this year and last year, will lead inescapably to the conclusion that oil drilling in the Arctic Ocean cannot be conducted in a safe and responsible manner. Drilling in such a dangerous place will not affect the price of fuel at the pump and makes even less sense when the climate impacts are factored in. To fulfill the President’s commitment to address climate change, we should be fostering clean energy and efficiency, not drilling in extreme, sensitive and special areas like America’s Arctic Ocean.

Sincerely,

Cindy Shogan  
Executive Director  
Alaska Wilderness League

Robert Wendelgass  
President  
Clean Water Action

Trip Van Noppen  
President  
Earthjustice

Kierán Suckling  
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cc: President Barack Obama

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