Subsistence Stakeholder Engagement Plan Natural Gas Production Drilling 2024 to 2025 and 2025 to 2026



Prepared for

Furie Operating Alaska, LLC Anchorage, Alaska

Prepared by

61 North Environmental Anchorage, Alaska

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ACRONYMS AND ABBREVIATIONS

ADN	Anchorage Daily News
ANCSA	Alaska Native Claims Settlement Act
AMI	area median income
Chugach	Chugach Electric Association, Inc.
CIRI	Cook Inlet Region Incorporated
CPF	central processing facility
dB	decibel
Enstar	Enstar Natural Gas Company
ESA	Endangered Species Act
Furie	Furie Operating Alaska, LLC
Hilcorp	Hilcorp Alaska, LLC
IHA	incidental harassment authorization
JRP	Julius R. Platform
LNG	liquified natural gas
MMPA	Marine Mammal Protection Act
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
OSV	offshore supply vessel
PSO	protected species observer
SEP	stakeholder engagement plan
USDOE	U.S. Department of Energy

1 INTRODUCTION

Furie Operating Alaska, LLC (Furie) has applied for two incidental harassment authorizations (IHAs) from the National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS) under Section 101(a)(5) of the Marine Mammal Protection Act (MMPA). The IHAs authorize the non-lethal, unintentional taking of small numbers of marine mammals, incidental to towing a mobile jack-up drilling rig and production drilling activities at the Julius R. Natural Gas Platform (JRP) in Cook Inlet, Alaska. The application requested IHAs covering two years of activities. The first year (Year 1) is from April 1, 2024, to March 31, 2025, and the second year (Year 2) is from April 1, 2025, to March 31, 2025.

The IHAs are expected to authorize the non-lethal, incidental, and unintentional take by behavioral disturbance of small numbers of the following marine mammal species that may occur in the vicinity of sound-generating activities:

- fin whales (Balaenoptera physalus)
- humpback whales (Megaptera novaeangliae)
- minke whales (Balaenoptera acutorostrata)
- gray whales (Eschrichtius robustus)
- beluga whales (Delphinapterus leucas)
- killer whales (Orcinus orca)
- harbor porpoise (*Phocoena phocoena*)
- Dall's porpoise (Phocoenoides dalli)
- Pacific white-sided dolphin (Lagenorhynchus obliquidens)
- harbor seals (Phoca vitulina)
- Steller sea lions (*Eumetopias jubatus*)
- California sea lions (Zalophus californianus)

Under the MMPA, "take" means to harass, hunt, capture, kill, or attempt to harass, hunt, capture, or kill any marine mammal. "Harassment" is statutorily defined as any act of pursuit, torment, or annoyance that: A) has the potential to injure a marine mammal or marine mammal stock in the wild (Level A Harassment); or B) has the potential to disturb a marine mammal or marine mammal stock in the wild by disrupting behavioral patterns, including, but not limited to, migration, breathing, nursing, breeding, feeding, or sheltering, but which does not have the potential to injure a marine mammal or marine mammal stock in the wild (Level B Harassment).

Furie requested authorization of Level B takes for the marine mammal species listed above. Although the risk of a Level A exposure is low, Furie also requested authorization of three Level A takes of harbor seals each year. No other marine mammal species is expected to be exposed to the Level A sound intensity threshold.

When a project is conducted in or near a "traditional Arctic subsistence hunting area," where "Arctic waters" are defined as north of 60° N latitude, federal regulations require IHA applicants to include "...information that identifies what measures have been taken and will be taken to minimize adverse effects on the availability of marine mammals for subsistence uses."

The project will take place north of 60° N latitude in Cook Inlet, which is near a traditional subsistence hunting area and could affect the availability of marine mammals for subsistence uses. Therefore, Furie will communicate with representative Alaska Native subsistence users and tribal members to identify and explain the measures that have been taken or will be taken to minimize any adverse effects of the project on the availability of marine mammals for subsistence uses.

This stakeholder engagement plan (SEP) includes information on the measures that will be taken to avoid adverse effects on the subsistence use of marine mammals. The purpose is to foster open communication and build relationships with key stakeholders who may be affected by or have an interest in Furie's operations.

2 PROJECT DESCRIPTION, PURPOSE, AND NEED

Furie is a small, independent, Alaskan-owned natural gas company that provides affordable energy to local utilities and industrial customers in Southcentral Alaska. Furie operates a central processing facility (CPF) in Nikiski, Alaska, and the JRP, located offshore in Upper Cook Inlet, approximately 15 miles northeast of the CPF and 8 miles south of Tyonek, Alaska. The JRP is about 7.4 miles from the northwestern shoreline and 10 miles from the southeastern shoreline. Furie operates natural gas wells in four of the six well slots on the JRP. A marine gathering line connects the JRP to the CPF, transporting natural gas and occasional small volumes of produced water to shore. At the CPF, the natural gas is conditioned for sale into the local carrier pipeline. Furie's customers include Enstar Natural Gas Company (Enstar), Chugach Electric Association, Inc. (Chugach), Homer Electric Association, Inc., Matanuska Electric Association, and the Marathon Petroleum Company refinery in Kenai, Alaska.

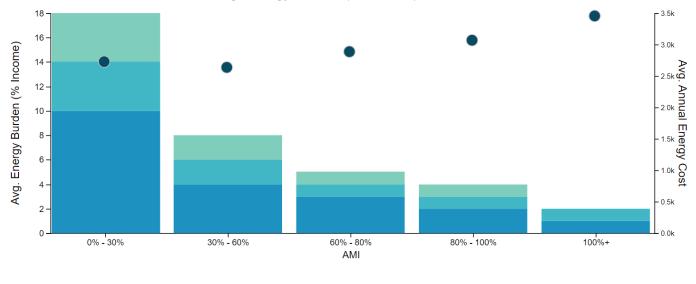
Recently, Alaskan media outlets have publicized a report by the Alaska Department of Natural Resources, Division of Oil and Gas, that warns of a looming natural gas shortage in Southcentral Alaska as early as 2027 (Burdick and Meza, 2023). The report emphasizes the urgent need to develop proven reserves and find new reserves to meet current demand. The primary electric utility in Anchorage, Alaska (Chugach) and the primary natural gas utility (Enstar) are evaluating options to import liquified natural gas (LNG) from Canada into Alaska (Anchorage Daily News [ADN] 2022b). Though exact costs are unknown, the transportation costs and new infrastructure required to deliver imported LNG are expected to increase prices significantly for home heating and electricity for residents. Renewable sources of electricity, such as solar or wind, may mitigate some of the projected shortfall for electrical generation. However, using electricity for heating would require homeowners and businesses to replace gas furnaces and boilers that currently heat most buildings in Southcentral Alaska. An analyst for the Renewable Energy Alaska Project recently described the cost of replacing natural gas for home heating as "catastrophically large" (ADN 2022a).

Low-income residents pay proportionally more of their income for electricity and heating than consumers at or above a community's median income (U.S. Department of Energy [USDOE] 2023). As a result, an increase in the price of natural gas will disproportionately affect low-income communities. Figure 1 displays the energy burden for various income levels, grouped by the percent of area median income (AMI) for Alaska. Alaskans in the lowest income bracket (0–30% of the median) spend an average of 18 percent of their annual income on energy. Fourteen percent of their income was spent on gas and electricity (gas plants produce most electricity). Therefore, Furie's efforts to maintain natural gas supplies will help keep the price of natural gas affordable for all residents of Southcentral Alaska.

Since 2015, Furie has supplied between 6 and 9 percent of the total natural gas produced annually in the region. All natural gas reservoirs experience a decline in production over time because the pressure decreases as the gas is

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extracted. To maintain production levels to meet existing contracts and to increase future production to help offset the expected shortfall, Furie plans to drill (or sidetrack) up to four new wells at the JRP—two in 2024 and two in 2025. Accessing the natural gas within these proven reservoirs will help slow the increase in energy prices in the region and provide benefits to the residents and businesses of Southcentral Alaska.



Avg. Energy Burden (% Income) for Alaska

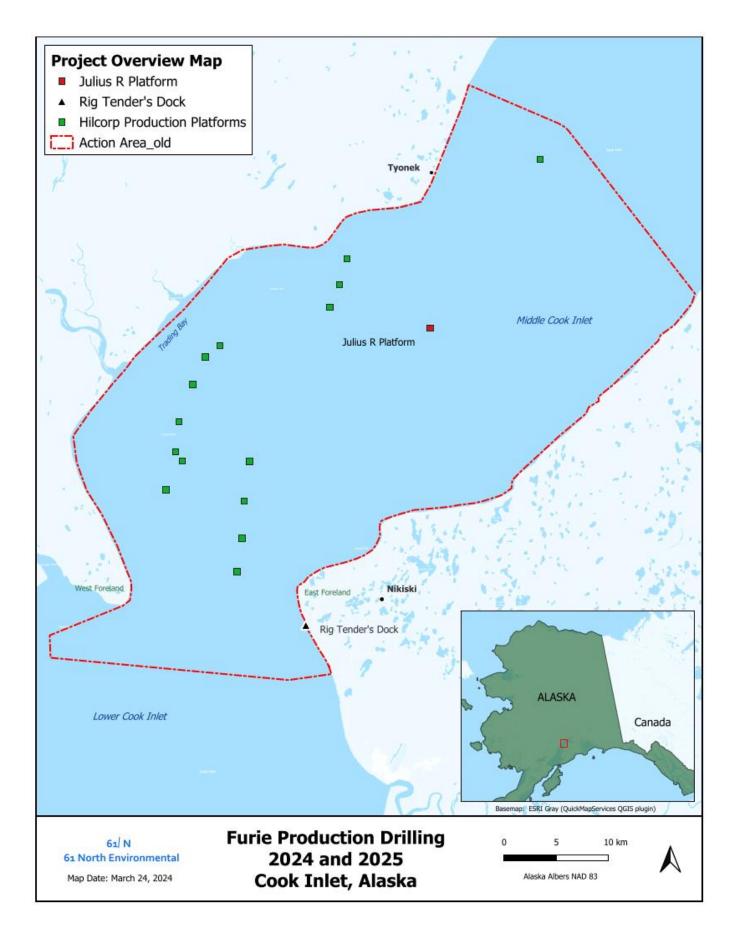
Avg. Annual Energy Cost

Figure 1. Average Energy Burden for Alaska as a Percent of AMI (Source: USDOE 2023)

Alaska Electricity Gas Other

2.1 Project Location and Affected Area

The project will be conducted in Cook Inlet, in the currently industrialized area occupied by oil and gas platforms operated by Hilcorp Alaska, LLC (Hilcorp), and Furie. The activity, which includes the mobilization of the Enterprise 151 jack-up drilling rig, may range as far south as the Rig Tenders Dock located in Nikiski, Alaska, south of the East Foreland, to as far north as Furie's JRP platform in the middle inlet. Furie may also tow the Enterprise 151 from one of Hilcorp's platforms or other asset locations. Therefore, the area that may be affected extends around all of Hilcorp's current platforms (Figure 2).



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Figure 2. Project Location, Affected Area, and Regional Landmarks

In addition to the physical footprint of the tugs and the Enterprise 151 while operating, the underwater sound can affect the marine habitats near the project. The sound is loudest near the tugs and the drilling rig while operating and becomes quieter at further distances. Therefore, the project's affected area includes any location where underwater sound is loud enough to possibly influence marine mammal behavior.

Underwater sound is the primary stressor from the project operations that may cause potential harassment of marine mammals. Marine mammals have been documented to react to continuous sounds at or above 120 decibels (dB). Therefore, NMFS typically designates 120 dB as the threshold where behavioral disturbance may result from continuous industrial underwater noise, such as vessel engine and propeller cavitation noise. Based on recent underwater recordings of three tugboats towing the Enterprise 151, sounds may exceed 120 dB up to 3,850 meters (2.4 miles) during mobilization and demobilization. A fourth tugboat may be needed to position the Enterprise 151 at the JRP, which may cause sounds to exceed 120 dB up to 4,483 meters (2.8 miles) from the JRP. If the tugboats are initially unsuccessful at positioning the jack-up rig at the JRP, it may be towed to a safe location nearby to wait for favorable conditions to retry the positioning.

The affected area, i.e., where sound may exceed 120 dB, may extend 3,850 meters from any point along the towing routes and temporary safe locations and up to 4,483 meters from the JRP during rig positioning. Therefore, the affected area includes 3,850 meters north and south of Rig Tenders Dock, within bays or other safe harbor areas, up to 3,850 meters from any Hilcorp platform, and up to 4,483 meters from the JRP. Hilcorp may operate the Enterprise 151 before or after Furie in the same season at one of their platforms or at other drilling locations within their lease areas. If Hilcorp operates the Enterprise 151 early in the season, Furie may tow the rig from one of their platforms instead of from the Rig Tenders Dock. Hilcorp will be operating under separate permits and authorizations for their activities.

Because the Tyonek Platform is located near the sensitive habitat of the Susitna River Delta, additional mitigation measures are required when Hilcorp initiates a tow in that area. Therefore, if Hilcorp operates the Enterprise 151 at the Tyonek Platform early in the season, they will maintain operatorship throughout drilling, and until the tow of the Enterprise 151 is underway with lines taut, the rig is under tug power. Furie will not assume operatorship until the mitigation measures to initiate the tow have been met, and the rig tow has begun. Figure 2 shows the area affected by the project activities, also known as the "action area."

2.2 Production Drilling Activity, Equipment, and Acoustic Sources

The Enterprise 151 is a 150 H-class, independent-leg, cantilevered jack-up drill rig capable of drilling to depths of 7,620 meters (25,000 feet) that can operate in waters up to 46 meters (150 feet) in depth. It has three legs that are adjusted to raise and lower the hull over the water's surface. Each leg of the jack-up rig has a spud can on the bottom designed to shallowly penetrate the seabed and disperse the rig's weight on the sea floor (Figure 3).

The duration of the operation, from mobilizing the rig to the JRP, installing the conductor pipes, production drilling, and demobilizing the rig, may take between 45 and 180 days. Although the IHAs may authorize activity for a full year, the project will be conducted during the "ice-free" season in Cook Inlet, typically between mid-April and mid-November.

In addition to towing the jack-up rig, other project operations may result in sounds that could cause behavioral changes in marine mammals. Up to two conductor pipes may be driven into the seabed using an impact hammer,

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similar to pile driving. The conductors will be placed within the well slots in the monopod leg of the JRP. When compared to open-water pile driving, the underwater sound from the installation will be reduced by the enclosure of the well slot and monopod leg. In addition, the impact installation of the conductor produces an "intermittent" sound rather than a continuous sound. NMFS has determined that behavioral changes in marine mammals may occur at 160 dB or greater for intermittent sounds. During conductor installation, intermittent sounds are expected to exceed 160 dB up to 1,585 meters from the JRP.

Once production drilling commences, lower-level sounds from other sources such as diesel generators, mud and cement pumps, and ventilation fans will be emitted, but they are not expected to cause any disturbance to marine mammals. Offshore supply vessels (OSVs) and helicopters will transport supplies and personnel to the Enterprise 151. The OSV operators and helicopter pilots must also follow marine mammal avoidance measures while operating.

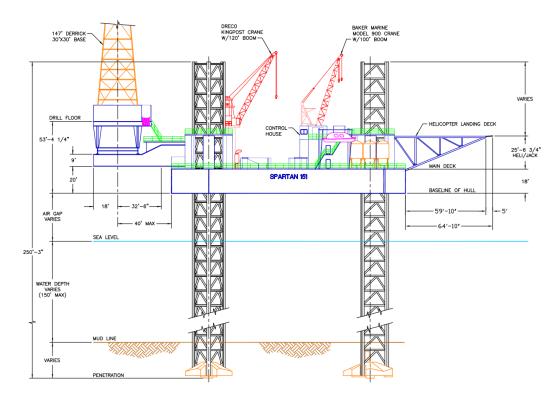


Figure 3. Enterprise 151 Schematic (Elevation View)

2.3 State and Federal Authorizations and Permits

Furie has received Federal and State permits and authorizations and has completed several required plans to conduct the proposed work. Some Federal authorizations are pending approval and are expected by April 2024. A list of these agencies and authorizations or permits is provided in Table 1. A list of pertinent agency contacts is provided in Table 2.

Agency	Authorization or Permit	Approval Date (Expected Date)	Expiration Date (Expected Date)
Alaska Department of Environmental Conservation – Division	Alaska Pollutant Discharge Elimination System (APDES) Individual Permit AK0053686	April 1, 2021	March 31, 2026
of Water	APDES General Permit AKG315220	February 1, 2022	December 31, 2026
Alaska Department of Environmental	Air Quality Control Minor Permit AQ0982MSS11 (Julius R Platform)	February 15, 2019	None
Conservation – Division of Air Quality	Air Quality Control Minor Permit AQ0982MSS10 (Enterprise 151)		None
Alaska Department of Environmental Conservation – Spill Prevention and Response	Oil Discharge Prevention and Contingency Plan Approval	November 26, 2021	November 25, 2026
Alaska Department of Natural Resources	Unit Plan of Development	(January 1, 2024, and January 1, 2025)	(December 31, 2024, and December 31, 2025)
U. S. EnvironmentalSpill Prevention, Control, andProtection AgencyCountermeasure Plan		N/A (self-certified)	None
National Marine	Marine Mammal Protection Act – Incidental Harassment Authorizations	(June 1, 2024, and June 1, 2025)	(May 31, 2025, and May 31, 2026)
Fisheries Service	Endangered Species Act – Incidental Take Statement	(June 1, 2024)	To be determined
U.S. Fish and Wildlife Service	Endangered Species Act – Letter of Concurrence	(June 1, 2024)	To be determined
Federal Aviation			

Table 1. Authorizations and Permits

Organization/Agency	Contact	Address	Email / Phone
National Marine Fisheries Service Headquarters	Leah Davis	Office of Protected Resources 1315 East-West Highway 13th Floor Silver Spring MD 20910	leah.davis@noaa.gov (301) 427-8401
National Marine Fisheries Service Alaska Region	Sierra Franks	Office of Protected Resources 222 W 7th Ave, Anchorage, AK 99513	Sierra.franks@noaa.gov (907) 271-3023
U.S. Fish and Wildlife Service	Heather Patterson	Alaska Marine Mammals Management Office 1011 East Tudor Road Anchorage, AK 99503 United States	heather_patterson@fws.gov (907) 786-3427
Alaska Department of Environmental Conservation, Division of Air Quality	James Plosay	333 Willoughby Avenue, 8th Floor, Ste 800, State Office Building, Juneau, AK 99801	jim.plosay@alaska.gov (907) 465-5561
Alaska Department of Environmental Conservation, Division of Water	Roy Robertson	Alaska Department of Environmental Conservation 555 Cordova St, Anchorage, AK 99501	roy.robertson@alaska.gov (907) 269-4605
Alaska Department of Environmental Conservation – Spill Prevention and Response	Tiffany Larson	Alaska Department of Environmental Conservation 555 Cordova St, Anchorage, AK 99501	tiffany.larson@alaska.gov (907) 451-2298

Table 2. Federal and State Agency Contacts

3 MITIGATION MEASURES

In the IHA application submitted to NMFS, Furie proposed several mitigation measures to avoid or reduce the behavioral disturbance of marine mammals. When NMFS issues the IHA, they may accept these measures if they are sufficient or may require additional measures. Therefore, the IHA will contain the authoritative list of mitigation measures Furie must implement. The list of mitigation measures is extensive; therefore, only a summary is provided here. The mitigation measures include:

- Furie may not cause behavioral disturbance to species that the IHA does not authorize.
- Furie personnel, contractors, and vessel operators will avoid direct physical interaction with marine mammals during project activities.
- Trash will be disposed of in accordance with State law (Alaska Statute 46.06.080), cutting closed loops (e.g., packing straps, rings, and bands) and securing ropes, nets, and other hazards to avoid entanglement of marine mammals.

- Furie will employ NMFS-qualified, trained protected species observers (PSOs) before, during, and after the towing and positioning of the jack-up rig and during conductor pipe installation. The PSOs will have the authority to shut down conductor pipe installation if a marine mammal enters a shutdown zone.
- Towing operations will be delayed if marine mammals are within 1,500 meters before beginning the rig tow. To the extent practical while ensuring the safety of personnel and the jack-up rig, tugboats will maintain a slow speed (4 knots or less) while towing to allow marine mammals to easily avoid the vessels and rig.
- Rig tows will only occur during favorable tides to ensure a safe transit and to minimize the duration and impact to the extent possible.
- The vessel operators and crew will receive training on marine mammal mitigation and the communication protocol.
- Conductor pipe installation will only occur during daylight hours. A "soft start" technique will be employed when beginning impact installation to slowly ramp up the noise level before full power is used.
- The PSOs must have full visibility of the harassment zones for 30 minutes before the start of conductor pipe installation.
- If a marine mammal approaches or enters a shutdown zone during installation, the PSO will radio the hammer operator to cease operations.
- If beluga whales enter any harassment zone (e.g., a 120-dB Level B harassment zone), the impact installation of the conductor pipe will cease until they have been observed leaving the zone, or 30 minutes have passed since the last sighting.
- Furie will submit monthly reports of monitoring duration, marine mammal sightings, project activities, and mitigation measures implemented to NMFS. Furie will also summarize this information in a final report at the end of each project year.
- Helicopter pilots will also minimize the effects on marine mammals by maintaining an altitude of 1,500 feet (if the cloud ceiling allows it) and will make course adjustments to keep at least 1,500 feet of separation from any marine mammals. Helicopters will also not circle or hover above marine mammals.

4 SUBSISTENCE USER GROUPS

Furie is committed to engaging local potential subsistence users and stakeholders to inform them of the timing and location of planned activities, listening to concerns, and using valued input and feedback to shape decisions that may impact subsistence activities. The primary goal of this SEP is to coordinate with the Alaska Native subsistence user groups whose activities may be affected by Furie's operations. The communities within or near the project action area with potentially affected subsistence user stakeholder groups include:

- Salamatof
 - Tribe: Salamatof Tribe (also Village of Salamatof)
 - Village Corporation: Salamatof Native Association, Inc.
 - Regional Corporation: Cook Inlet Region, Inc. (CIRI)
- Tyonek
 - Tribe: Native Village of Tyonek
 - o Village Corporation: Tyonek Native Corporation
 - Regional Corporation: CIRI

Other Alaska Native communities are known to subsist on wild foods harvested within the Cook Inlet region but are not located near the project action area. These include the Native Village of Nanwalek, Port Graham Tribal Council, Seldovia Village Tribe, Ninilchik Village Tribe, Knik Tribe, Native Village of Eklutna, Chickaloon Village Traditional Council, and the Kenaitze Indian Tribe. Except for the Kenaitze Indian Tribe, these Alaska Native groups belong to regional Alaska Native corporations formed under the Alaska Native Claims Settlement Act (ANCSA). Nanwalek and Port Graham are part of the Chugach Alaska Corporation, and Seldovia, Ninilchik, Salamatof, Tyonek, Knik, Eklutna, and Chickaloon are part of CIRI. Alaska Native villages in CIRI and their locations relative to the project action area are shown in Figure 4. Villages in the Chugach Alaska Corporation and their locations in relation to the project action area are shown in Figure 5. The Kenaitze Indian Tribe is headquartered in Kenai, Alaska, with 1,800 members living across the Kenai Peninsula and elsewhere.



Figure 4. Alaska Native Villages Associated with CIRI Near the Project Action Area (excerpted from CIRI 2023)



Figure 5. Alaska Native Villages Associated with Chugach Alaska Corporation Near the Project Action Area (excerpted from Chugach Alaska Corporation 2023)

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5 PLAN IMPLEMENTATION

Furie intends to initiate dialog with the subsistence user groups identified to provide the project details, listen to and document concerns and potential impacts, and work collaboratively to avoid the impacts. Furie will initiate communication by providing an introductory email with project details to each potential subsistence user group identified. The inquiry will request input and feedback on the proposed project, to solicit information on the timing and location of any planned subsistence activities and how they may be affected by the potential towing routes of the jack-up rig. Furie will also offer to discuss the project in more detail over the phone, in a virtual meeting, or in person. If enough user groups express interest in obtaining more detailed information through a virtual or in-person meeting, Furie will coordinate and plan one or more meetings with the user groups.

As correspondence and feedback are received, Furie will document the concerns and suggestions in a project archive that will be maintained for future reference. At regular intervals, or when critical information is received, Furie will aggregate the feedback and respond to the user groups. Furie may also request additional information from subsistence users to better understand their concerns.

If tribes provide information showing that impacts are likely, Furie will take steps to avoid those impacts. It is important to note that project constraints may restrict the available solutions. Some factors, such as the starting location, route, and timing of the rig tow, may not be able to be changed for logistical or safety reasons. For example, if Hilcorp operates the rig before Furie, the tow may begin at one of Hilcorp's platforms (e.g., in Trading Bay) instead of at the Rig Tender's Dock. In addition, the tidal conditions must be right, and the current speeds must be slow enough to secure and tow the rig safely. The route must occur in water deep enough to avoid mudflats and shoals. Also, the rig can only be towed and operated during ice-free conditions.

Furie also believes that the continued production of affordable natural gas is a significant concern to the residents and businesses of Southcentral Alaska. Furie is committed to meeting the required production levels to meet existing sales contracts and to adding natural gas supplies when possible to offset declines by other operators. Furie understands these goals may be in tension with or in opposition to the goals of other regional stakeholders. However, Furie is committed to an open and transparent dialogue and collaboration to avoid negative outcomes from the project. Table 3 provides contacts for the Furie drilling project.

Table 3. Furie Project Contact List

Name	Role	Phone	Email
Mark Slaughter	Chief Commercial Officer	(907) 277-3726	m.slaughter@furiealaska.com
Andrew Lenz	Environmental Consultant	(907) 529-2480	drew@61northalaska.com

6 REFERENCES

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