

Petitioner's Exhibit 31



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

JUN 19 2007

Reply to
Attn Of: AWT-107

Johnny Aiken
North Slope Borough Planning Department
P.O. Box 69
Barrow, Alaska 99723

Re: Request to Assist US Environmental Protection Agency (EPA) in Scheduling Public Comment Periods
Request for EPA to Work with North Slope Borough (NSB) Address Concerns on Shell Permitting Action

Dear Mr. Aiken:

Thank you for your May 23, 2007, letter to the U.S. Environmental Protection Agency (EPA) reflecting upon EPA's decision to deny your request to extend the public comment period for our preliminary decision to issue two Air Quality Control Minor Permits to Shell Offshore Inc. On June 12, 2007, my staff communicated to your air permitting consultant, Susan Harvey, EPA's final decision to issue the two Air Quality Control Minor Permits to Shell. An electronic copy of EPA's final decision was sent to you on the 14th.

In your May 23, 2007 letter, you requested that EPA work with the North Slope Borough (NSB) and tribes to address your significant concerns on our permitting action. We appreciate your concerns even though we did not have time for further interaction on these two permits. The comments that you did submit within the time available were clearly articulated, and we have considered them carefully. We were also pleased that there was participation in Nuiqsut on May 8, 2007, at our public hearing, and we have considered input from the hearing carefully as well.

As EPA stated in our May 8, 2007 letter, expediting energy-related projects is a national priority. In this case, we were working to issue timely permits for Shell's operations this year.

Meaningful public participation is also a priority for EPA. We believe that we could improve our procedures to better consider how best to work with North Slope

communities that are engaged in subsistence harvest. With this in mind, I have tasked Theodore Rockwell in our Anchorage office to lead an effort to improve the way that the Region carries out its responsibilities. The group that he is leading will begin working with the NSB to better understand the significance, extent, and timing of the North Slope subsistence harvest seasons. With your help, EPA can adjust our existing decision making procedures to promote more meaningful public input for actions impacting the North Slope communities. Ted is beginning this effort and will be contacting your staff very soon to begin this very important work.

Sincerely,



Elin D. Miller
Regional Administrator

Cc: NSB Mayor Edward S. Itta
Karla Kolash, NSB Mayor Assistant
Gordon Brower, NSB Land Management Regulations
Taqulik Hepa, NSB Wildlife Department
Bessie O'Rourke, NSB Law Department
Layla Hughes, NSB Law Department
Harvey Consulting, LLC.
City of Pt. Lay
City of Pt, Hope
City of Wainwright
City of Atqasuk
City of Anaktuvuk Pass
City of Barrow
City of Kaktovik
City of Nuiqsut
Alaska Eskimo Whaling Commission
Inupiat Community of Artic Slope (IRA)
Native Village of Barrow Inupiat Traditional Government
Native Village of Nuiqsut
Native Village of Kaktovik
Village of Wainwright
Point Lay Tribal Council (IRA)
Native Village of Point Hope
Theodore Rockwell, AOO
Natasha Greaves, EPA, Region10
Dan Meyers, EPA, Region 10
Nancy Helm, EPA, Region 10