BRACEWELL

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February 20, 2025

BY HAND DELIVERY

Paul Huang, Acting Director
Bureau of Safety and Environmental Enforcement
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Office of the Solicitor
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Justin Miller, Regional Director
Bureau of Safety and Environmental Enforcement
U.S. Department of the Interior
Alaska OCS Region
3801 Centerpoint Drive, Suite 500
Anchorage AK 99503

Office of the Deputy Secretary
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Re: Notice of Appeal / Hilcorp Alaska, LLC

To whom it may concern:

Please find enclosed a timely Notice of Appeal by Hilcorp Alaska, LLC, pertaining to the attached December 26, 2024, and January 21, 2025, letters from the Bureau of Safety and Environmental Enforcement and the Office of the Deputy Secretary. A copy of a Pay.gov receipt reflecting payment of the appeal fee is also attached.

Please contact me if you have any questions concerning this filing. Hilcorp would strongly prefer to address and resolve this matter outside an IBLA proceeding and files this appeal solely to preserve its rights.

Best regards,

Ann D. Navaro
Counsel for Hilcorp Alaska, LLC

Ann D. Navaro
Partner

T:+1.202.828.5811 F: +1.800.404.3970
2001 M Street NW, Suite 900, Washington,DC 20036-3310
ann.navaro@bracewell.com bracewell.com

UNITED STATES DEPARTMENT OF THE INTERIOR
INTERIOR BOARD OF LAND APPEALS

In Re Hilcorp Alaska, LLC	)	**Denial of Suspension of Production Request and Notice of Lease Expiration and Termination of the Liberty Unit dated December 26, 2024, and January 21, 2025**
	)	**IBLA-2025-_____**

NOTICE OF APPEAL

Pursuant to 43 C.F.R. §§ 4.410 and 4.411 and 30 C.F.R. §§ 290.2 and 290.4, Hilcorp Alaska, LLC ("Hilcorp") hereby notices its appeal of the Bureau of Safety and Environmental Enforcement's ("BSEE"), December 26, 2024 denial ("Denial") of Hilcorp's August 28, 2024, request for suspension of production ("SOP") for three Alaska Outer Continental Shelf ("OCS") leases— OCS-Y-1585, OCS-Y-1650, and OCS-Y-1886 (together the "Liberty Unit")—and the BSEE Notice of Lease Expiration and Liberty Unit Termination ("Notice") dated January 21, 2025.[1]

This appeal is timely submitted to BSEE within 60 days of the Denial and Notice in accordance with 30 C.F.R. § 290.4. Pursuant to the requirements of 30 C.F.R. § 290.4, attached are copies of the Denial (Attachment A), the Notice (Attachment B), and a *Pay.gov* confirmation receipt page reflecting payment of a processing fee for this appeal (Attachment C).

[1] The Denial was signed by the Biden Administration's Acting Deputy Secretary but states that "BSEE is informing Hilcorp that our review of the SOP request is complete, and BSEE is issuing a decision on the request as detailed in this letter." BSEE's decision does not indicate that it is a final agency action of the Department of the Interior.

Hilcorp reserves the right to supplement this Notice of Appeal with a Statement of Reasons in accordance with 43 C.F.R. § 4.412.

Date: February 20, 2025

Respectfully submitted,

Ann D. Navaro
Stephen C. Wald
Bracewell LLP
2001 M Street N.W., Suite 900
Washington, D.C. 20036
Telephone: (202) 828-5800
Facsimile: (800) 404-3970
ann.navaro@bracewell.com
stephen.wald@bracewell.com

Counsel for Hilcorp Alaska, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 20th day of February 2025, and pursuant to 43 C.F.R. §§ 4.413 and 4.401(c)(4)(i)(A), this **NOTICE OF APPEAL** and all attachments thereto were filed and served on the following:

By Hand:

Paul Huang, Acting Director
Bureau of Safety and Environmental Enforcement
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Justin Miller, Regional Director
Bureau of Safety and Environmental Enforcement
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Ann D. Navaro
Counsel for Hilcorp Alaska, LLC