



Ben Stevens
Vice President
External Affairs & Transportation
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March 12, 2021

Attorney General Treg R. Taylor
Alaska Department of Law
1031 West 4th Avenue, Suite
Anchorage, AK 99501-1994

Dear Attorney General Taylor:

As you know, I left my position as Chief of Staff to the Governor effective February 26, 2021 and am now employed by ConocoPhillips. My responsibilities include government relations, village outreach, community investment, media and advertising, and management of ConocoPhillips Alaska's pipeline business, including its interests in the Trans-Alaska Pipeline System (TAPS) and the other common carrier pipelines that connect to TAPS. Additionally, I serve on the management team for ConocoPhillips Polar Tanker fleet.

I am aware Alaska Statute 39.52.180(a) prohibits me, as a former public officer – for two years after leaving state service – from representing, advising, or assisting a person for compensation regarding a matter that was under consideration by the administrative unit I served, and in which I participated personally and substantially through the use of official action. I am also aware Alaska Statute 39.52.180(c) allows a waiver of the two-year restriction on employment, where that waiver is not adverse to the public interest.

As a high-level State employee in the Governor's office, I was aware of many matters affecting the State's oil and gas resource development, including, for example, ConocoPhillips's proposed development of the Willow Project in the NPR-A. I am currently working on behalf of ConocoPhillips to secure the legal and political support of the North Slope Borough for that Project, and no doubt will be asked to perform other tasks intended to support that Project. I do not believe, however, that my responsibilities in support of the Willow Project implicate in any way the limitations imposed by AS 39.52.180(a), as I never participated personally and substantially in any official decision related to the Project while with the Governor's office.

My efforts on behalf of the Willow Project are an example of the scope of work I will likely be asked to perform on behalf of my new employer. While this work, in my view, falls outside the scope of AS 39.52.180(a), given the infancy of my new role with ConocoPhillips it is yet unclear whether I would ever be asked to take on any responsibilities that might in fact require me to work on matters in which I participated personally and substantially through the exercise of official action while with the Governor's office. ConocoPhillips has said it has no intent to ask me to do so. Nevertheless, out of an abundance of caution, and given the degree of public misunderstanding regarding the scope of the activities proscribed by the Executive Branch Ethics Act, I believe it is worthwhile for me to seek the waiver permitted, with your approval, under AS 39.52.180(c). I believe that allowing me to work on behalf of ConocoPhillips on matters that may involve resource development issues is consistent with the

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public interest and will in fact inure to the benefit of the State. I am hopeful the Governor, in consultation with you, will agree and grant a waiver for such work, as permitted by law.

Sincere Regards,

A handwritten signature in black ink, appearing to read "Ben Stevens". The signature is fluid and cursive, with the first name "Ben" and last name "Stevens" clearly distinguishable.

Ben Stevens

cc:

Maria Bahr, Alaska Department of Law

Barbara Fullmer, ConocoPhillips Alaska

Erec Isaacson, ConocoPhillips Alaska

Cori Mills, Alaska Department of Law