

December 14, 2018

Jaci Wells
SHPO Liaison/Historic Preservationist
Bureau of Land Management
Wyoming State Office
Sent via e-mail: Jaci Wells jwells@blm.gov

Re: Wyoming BLM/SHPO Protocol Appendices C and L Comments

Dear Ms. Wells,

The International Association of Geophysical Contractors (IAGC) would like to take this opportunity to formally submit comments on the Wyoming BLM / SHPO Protocol Appendices C and L.

IAGC is the international trade association representing the industry that provides geophysical services to the oil and natural gas industry. IAGC member companies play an integral role in the successful exploration and development of hydrocarbon resources through the acquisition and processing of geophysical data. Geophysical surveys are the only feasible technology available to accurately image the subsurface before a single well is drilled. Our member companies conduct many of their geophysical surveys on private, state, and federal lands throughout Wyoming and the adjacent Rocky Mountain states.

Appendix L: Standard Direct APEs

1. Seismic surveys do not have a construction right-of-way and are therefore not included in section I under Standard Direct APEs. Seismic surveys would then be listed under section II, “for all other undertakings not otherwise listed or referred to above or below, the direct APE is the project footprint plus a minimum 100ft. buffer.” **The IAGC request rewording section II under Standard Direct APEs to “For all other undertakings not otherwise listed or referred to above or below, the direct APE is a 50-foot buffer on both sides of the project footprint, or centerline for linear projects.”**
 - a. The current standard for seismic survey line coverage is a 100-foot buffer (50 feet on either side) from the centerline. By using “footprint” and not including “centerline” to section II, the total APE buffer would be 110 feet, which includes the width of the vehicles.
 - b. The current archaeological standard in Wyoming states a maximum coverage per archaeologist for a single pass at 100 feet. Adding the additional 10 feet to the

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APE, by using footprint instead of including centerline, would double the cost to seismic surveys as multiple passes by the archaeologist would be required for each receiver and source line.

- c. It is unclear from the wording if the buffer is to be 100 feet on both sides of the project footprint, or 100 feet in total (50 feet on either side).
2. Minimum buffer standards are being prescribed, however, maximum buffer standards need to be addressed. For example, historical trails have buffers of 100 feet up to 1,320 feet. Even those areas that are considered “noncontributing” were prohibited during previous surveys in Wyoming.

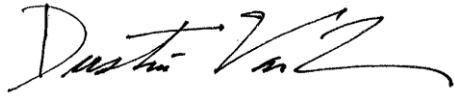
Appendix C: Guidance on the Assessment of Setting for a Historical Property

1. Under Section II.A.2.h “for temporary construction elements (i.e. those elements or equipment that will be in place less than one year).”
 - a. The IAGC previously submitted comments in June 2017 (Comment #43 from 09 November 2018 Responses to Comments) requesting additional language be added to clarify geophysical operations. The words “or equipment” was added to “h”, however, geophysical operations (seismic surveys) are inherently different from construction.
 - b. The IAGC requests section h be changed to specify the inclusion of geophysical operations. Without clearly stating this, one cannot justify excluding geophysical surveys from setting assessment.
 - c. The section should read “for temporary construction or geophysical survey elements (i.e. those elements or equipment that will be in place less than one year).

Geophysical operations are unique in that they cover vast areas but directly affect very few acres, and have been recognized by BLM as activities with “limited impact” and “transient” in nature. Ref BLM Manual 3150, dated June 7, 1994. Typically, geophysical operations do not occupy any surface area for more than a matter of minutes, and operations progress at the rate of about two square miles per day. Unlike construction activities such as pipelines, powerlines, well pads, and wind farms, geophysical operations can be modified to relocate the source of their minimal disturbance away from other important resources and should therefore NOT be included along with other activities administered by the BLM/SHPO Protocol.

The IAGC appreciates the opportunity to comment on Appendices C and L of the Wyoming State Protocol. The geophysical industry systematically assesses operating practices and management systems with the goal of continuous improvement in safety and environmental performance. The safety and environmental performance record over many decades suggest that these efforts have been effective. The IAGC also believes that these changes have made onshore oil and gas exploration and development safer, providing protection to communities and the environment. We look forward to hearing from you at the in-person or conference call meeting when it is scheduled.

Yours sincerely,



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