



Via email

17 January 2020

Jean Sonneman
BLM Information Collection Clearance Officer
Bureau of Land Management
1849 C Street NW
Room 2134LM
Washington, DC 20240

Re: OMB Control Number 1004-0132

The IAGC respectfully submit the following comments on the Bureau of Land Management's (BLM) proposed renewal of an information collection request (ICR) for Geothermal Resource Leasing and Permitting, and Geothermal Resources Units Agreements that was published in the Federal Register on November 18, 2019.

IAGC is an international trade association representing more than 110 member-companies from all segments of the industry that provides geophysical services (geophysical data acquisition, processing and interpretation, geophysical information ownership and licensing, and associated services and product providers) to the oil and natural gas industry. IAGC member companies play an integral role in the successful exploration and development of offshore hydrocarbon resources through the acquisition and processing of geophysical data. For more than 45 years, IAGC has been the global voice of the geophysical industry and is the only trade organization solely dedicated to the industry.

The IAGC thanks BLM for their continued efforts to improve efficiency and modifying the permit application process and the IAGC and its members agree; submitting the permit application to the agency which has surface-management jurisdiction is more efficient.

Industry has been able to operate successfully under the existing structure; however, there are aspects of the current process that may be able to be completed more efficiently. IAGC members have identified areas that may make the permitting process run more efficiently and we offer the following suggestions and comments:

1. BLM has requested comments on whether the information collected was "processed and used in a timely manner". Currently, industry finds the permitting process to be open-ended and uncertain. The IAGC recommends that BLM establish a specific timeline for permit review and approval to provide more certainty when our members apply for permits.
2. We encourage BLM to explore the creation of an electronic permit application process. Efficiencies for permit processing and man-hours may be realized through electronic permit applications. Many countries around the world utilize electronic permit application processes. This allows the applicant to monitor the status of the permit process

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and timely provide any information responsive to requests from BLM. This has been seen to drastically decrease the permit process timeline.

3. Can BLM routinely notify all applicants of form updates? Out of date templates have been used in the past, which ultimately causes delay, an electronic system would allow for timely and seamless updates to applicants

We appreciate the opportunity to comment on the collection of information contained in this notice and are available for further discussions at your convenience. If you have any questions, please contact Dustin Van Liew (dustin.vanliew@IAGC.org, 713.957.8080).

Sincerely,

A handwritten signature in black ink that reads 'Dustin Van Liew'.

Dustin Van Liew
VP, Regulatory & Governmental Affairs
International Association of Geophysical Contractors

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