

**UNITED STATES DEPARTMENT OF THE INTERIOR  
OFFICE OF HEARINGS AND APPEALS  
INTERIOR BOARD OF LAND APPEALS**

**IBLA 2017-135, *et al.***

**TGS, *et al.***

**E14-001, *et al.***

**Offshore Oil & Gas Exploration Permits  
Denied**

**APPELLANTS' RESPONSE TO BOEM'S MOTION FOR REMAND**

Appellants International Association of Geophysical Contractors, TGS, WesternGeco LLC, CGG Services (US), Inc., Spectrum Geo, Inc., and MultiKlient Invest AS support the Bureau of Ocean Energy Management's ("BOEM") Motion for Remand, filed on May 10, 2017. The denial of the permit applications at issue in this consolidated appeal was a politically calculated decision, rushed into effect in the waning days of the previous executive administration without administrative rigor or regard for applicable legal standards. BOEM's decision to fix the agency's plain error, as described in the Motion for Remand, will help to ensure that the permit applications are considered by BOEM through an appropriate and legally compliant administrative process.

If BOEM's Motion for Remand is granted, the pending motions to intervene in this consolidated appeal will be moot and the filing of responses to those motions is therefore premature. If BOEM's Motion for Remand is not granted, Appellants intend to file responses opposing the pending motions to intervene because, among other deficiencies, all of the pending motions to intervene fail to demonstrate that the movants are adversely affected by the decision challenged in this appeal—BOEM's original blanket denial of the permit applications. Accordingly, for the reasons stated in the Motion for Remand, Appellants join in BOEM's alternative request that the Board allow ten (10) business days from issuance of its order on

BOEM's Motion for Remand for the filing of responses to the pending motions to intervene, if such responses are necessary.

DATED: May 11, 2017.

Respectfully submitted,

STOEL RIVES LLP



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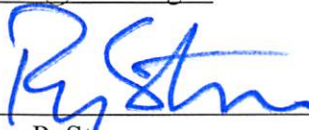
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**CERTIFICATE OF SERVICE**

I certify that on May 11, 2017 the foregoing **Appellants' Response to BOEM's**

**Motion for Remand** was sent by email to:

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Ryan P. Steen