

# Exhibit 2

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

|   |   |                                       |
|---|---|---------------------------------------|
| TGS; WesternGeco, LLC; CGG Services           | ) |                                       |
| (U.S.), Inc.; Spectrum Geo, Inc.; MultiKlient | ) | IBLA Appeal No.: 2017-135             |
| Invest AS; and International Association of   | ) | (consolidated)                        |
| Geophysical Contractors,                      | ) | IBLA Appeal No.: 2017-140             |
|   | ) |                                       |
| Appellants (Nos. 2017-135)                    | ) | Offshore Oil & Gas Exploration Permit |
| (consolidated)                                | ) | Denials                               |
|   | ) |                                       |
| Ion/GX Technology Corp.,                      | ) | <b>MOTION TO INTERVENE</b>            |
|   | ) |                                       |
| Appellant (No. 2017-140),                     | ) |                                       |
|   | ) |                                       |
| v.  | ) |                                       |
|   | ) |                                       |
| Bureau of Ocean Energy Management,            | ) |                                       |
|   | ) |                                       |
| Respondent,                                   | ) |                                       |
|   | ) |                                       |
| and   | ) |                                       |
|   | ) |                                       |
| Surfrider Foundation,                         | ) |                                       |
|   | ) |                                       |
| Proposed Intervenor-Respondent.               | ) |                                       |
| _____   | ) |                                       |

**DECLARATION OF MATT GOVE**

I, Matt Gove, do hereby declare:

1. I am making this declaration in support of the Surfrider Foundation's Motion to Intervene in the IBLA Appeal No. 2017-135 and IBLA Appeal No. 2017-140 (consolidated) in the *TGS et al. and ION/GX Technology Corp. v. Bureau of Ocean Energy Management* case regarding Offshore Oil & Gas Exploration Permit Denials.

2. I am currently a resident of Brooklyn, New York and have lived there since 2013.

3. I have been a member of Surfrider Foundation (Surfrider) since 2011 and have worked as the Mid-Atlantic Policy Manager for Surfrider since 2013, managing chapters of Surfrider from Virginia to New York. I regularly travel to coastal cities along the East Coast as part of my job. I also worked as a volunteer for the District of Columbia chapter of Surfrider from 2010 through 2011 when I lived there.

4. As the Mid-Atlantic Policy Manager for Surfrider, I have worked on the Protect The Atlantic campaign since 2014, encouraging our members and others to attend public hearings and submit comments for the five-year OCSLA drilling plan, helping our chapters organize public rallies against offshore oil drilling, and encouraging coastal businesses to sign a petition against offshore drilling. I have also worked on marine issues for the New York State Department of Conservation from 2011 through 2013, before becoming a permanent staff member of Surfrider.

5. I regularly visit states along the eastern seaboard and have enjoyed going surfing, swimming, and occasionally snorkeling, scuba diving, and fishing on the Atlantic Coast for many years. In 2002, I worked in the Florida Keys as an instructor, teaching kids about marine organisms and ecosystems, often through snorkeling trips. While my most frequent surfing is near my home in New York, I generally surf in other Atlantic Coast states at least a couple times a year. I have surfed in Virginia Beach, Virginia; Kure Beach, North Carolina; Ocean City, Maryland; Long Beach Island, New Jersey; and Hampton Bays, New York, as well as Rockaways and Long Beach New York. When I go surfing I also enjoy relaxing on the beach, reading, and spotting wildlife such as marine mammals and shore birds. For my job, I visit beaches between New York and Virginia throughout the year and always enjoy a walk in the sand or on a boardwalk. The recreational enjoyment I derive from these activities depends on a vibrant marine ecosystem. My experiences form the foundation for

why I care so deeply about the Atlantic Ocean and motivate my work at Surfrider to protect our coast from threats stemming from pollution, coastal development, and oil and gas exploration and development.

6. Some of the best experiences I've had surfing, snorkeling, scuba diving, fishing, and visiting the beach have happened when I've encountered a marine mammal, like a dolphin or a whale. For example, I have been fortunate enough to see a manatee and dolphins in the Florida Keys while snorkeling. On one occasion surfing in Ocean City, MD, there were dolphins all around me and they were so close I could hear them taking their breaths when they surfaced. These experiences – and even the mere possibility of encountering these amazing animals – are a fundamental part of my recreational enjoyment of these areas and what keep me coming back to these waters again and again. Just knowing that these animals are present is a core part of my experience of the Atlantic Coast's beaches and waters. My enjoyment of surfing, snorkeling, or fishing in these waters would be extremely diminished without strong and healthy populations of these animals in the wild.

7. I plan to continue traveling to the beaches in these and other states along the Atlantic Coast for many years into the future. I am an active surfer and plan to continue visiting surfing spots in many states. For example, I plan to visit Folly Beach, SC in October of this year to meet with our volunteers and do some surfing. I also plan to visit coastal communities in every Mid-Atlantic state this fall to organize workshops for recreational users like beach goers, surfers, and divers, and will visit the shore while I'm there, probably surfing in some locations.

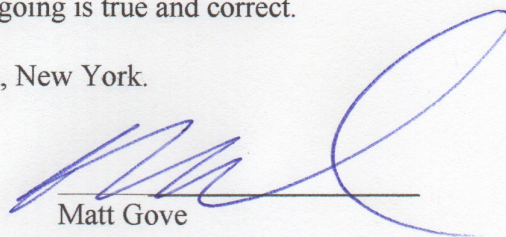
8. Through my work, I have learned about the many threats facing our ocean, including those posed by seismic exploration. Federal agencies, like the Bureau of Ocean Energy Management and the National Marine Fisheries Service, have confirmed that noise

from seismic surveys harasses and harms marine mammals. I understand that these agencies have estimated that the seismic testing the companies in this appeal propose to do would harm or harass thousands of marine mammals hundreds of thousands of times. As someone who cares deeply about marine mammals and the ocean ecosystem, I am concerned that seismic surveying off the Atlantic Coast will substantially diminish my ability to see and enjoy marine mammals as well as cause harm to the marine ecosystem.

9. The Bureau of Ocean Energy Management's decision to deny these six permits for harmful seismic testing protects my recreational and aesthetic enjoyment of a healthy Atlantic Coast. Reversing or altering that decision would eliminate that protection and directly harm my aesthetic, and conservation interests in the Atlantic Coast.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed this 8<sup>th</sup> day of May, 2017 in Brooklyn, New York.



Matt Gove