

WORKING WITH THE RGFO 2022: OIL AND GAS

January 5, 2022

Table of Contents

Naming Conventions	3
Fieldwork Authorizations (“FWAs”)	3
Pre-Field Literature Reviews	4
Communications	5
Reporting and Finalizing	5
BLM Colorado PLSS Special Survey Layer Available	6
Linear Recording Policy	6
Evaluating Site Integrity	7
Required Report Sections	7
Geospatial Data	7
BLM Review	8
Curation	9
Appendix I: Accessing the BLM Colorado PLSS Special Survey Layer	10
Appendix II: BLM Attribute Table Explanations	12

RGFO PROCESS FLOW CHART

Fieldwork authorizations

- Email FWA request PDF, with map of proposed APE and shapefiles, to BLM
- BLM will sign FWA once it receives completed FWA request, permittee shapefiles, and proponent shapefiles (sent from the proponent to the appropriate non-cultural resources BLM POC).

Post-Fieldwork/Pre-Reporting

- Request the following from BLM:
- Undertaking name
 - BLM number
 - SHPO doc number [provide BLM with county name(s) and positive/negative results status]
 - Site numbers (provide BLM with linear/non-linear status and any known site names)

Reporting

- Transmit completed shapefiles (NOT .gdb), including attribute tables FULLY populated with eligibility determinations, BLM and SHPO numbers (as well as the rest of the fields), and draft documentation to BLM. Incomplete GIS files will delay review.
- BLM will review forms first, and will not review reports until forms review is complete, as reports often change with form revisions.

(Changes from 2021 highlighted in yellow)

Naming Conventions

BLM will establish the name of the undertaking, and it will need to be used in all attribute tables, forms and reports, and any other references to the undertaking. Additional words must not be added to the title (e.g., “Cultural Resources Inventory of”, county name, state name).

Naming will be done by our oil and gas staff. The name will consist of the operator's company name and a unique pad name (NOT the name of a third-party contractor or a name generated by the archaeological contractor).

Fieldwork Authorizations (“FWAs”)

In order to avoid unanticipated time and cost to the operators, the BLM archaeology staff, as well as the BLM oil and gas staff, must receive compatible shapefiles at the time that the FWA is requested. Archaeological contractors are encouraged to communicate this requirement to any operator seeking their services. The BLM oil and gas staff must receive the shapefiles from the operator (rather than from the archaeological contractor).

The shapefiles sent from the archaeological contractors to the BLM archaeological staff must include both the proposed infrastructure locations (infrastructure includes well pads, roads, pipelines, and associated facilities) and the proposed buffers. If the archaeological inventory results in a need to relocate infrastructure, the archaeological contractor must contact the BLM to determine whether any additional inventory is necessary. These steps will streamline the process from FWA through completion of the NEPA document, and will prevent the need for additional inventory, documentation and SHPO consultation at the last minute.

Please e-mail us a PDF containing the completed FWA application form and map of the proposed inventory area, along with shapefiles in NAD 83, Zone 13. Because shapefiles must be sent to both archaeological and oil and gas staffs from the appropriate source, we can no longer guarantee the completion of the FWA process on the same day that the FWA request is received.

We will NOT accept KMZs in lieu of shapefiles; if received, we will return them to you and will not begin the process until we receive shapefiles. This applies to ALL geospatial data supplied by permittees.

Please DON'T include maps containing site information with FWA requests. The FWAs are public documents.

All infrastructure must be inventoried, including well pads, roads, pipelines and other facilities. For linear infrastructure, inventory buffers should be at least 50' on both sides of the centerline.

Well pad and facilities inventory is on a sliding scale, and is based on the shape of the disturbance area. The inventory buffer must be centered over the area of disturbance, regardless of land status. Please advise operators that the buffers must be adequate to cover the pads and

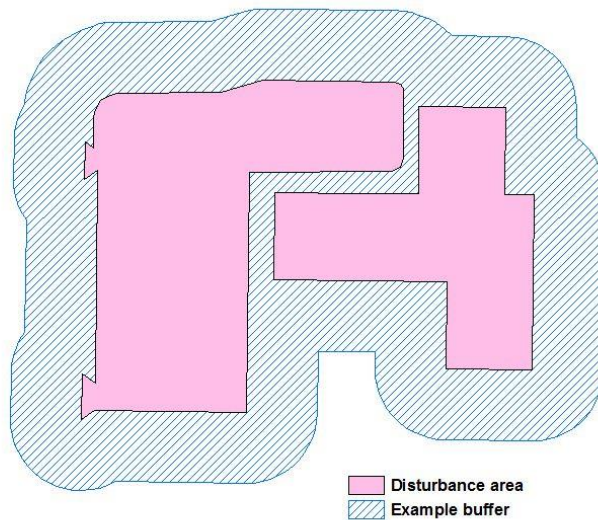
associated facilities and infrastructure ultimately submitted in the APD, or re-inventory will be necessary.

Square area of disturbance buffer requirements:

- 5 acres or fewer = 10 acre inventory
- 5+ - 10 acres = 20 acre inventory
- 10+ = 40 acre inventory

Non-square (round, rectangular, multi-sided polygon or glob, etc.) area of disturbance buffer requirement:

- The main disturbance area, whether “temporary” or “permanent”, plus a 50 m’ (164’) buffer echoing the shape of the disturbance area:



Block surveys are encouraged.

Permittees may not place physical datum markers on sites. If this occurs, the permittee will be required to return to the field and retrieve them.

Pre-Field Literature Reviews

There is no need to visit the office. RGFO and SHPO have much of the same information, which can be accessed in the Compass database. However, the SHPO is currently behind in updating Compass, so please let us know if you notice missing data. NOTE THAT BECAUSE SHPO IS SO FAR BEHIND, WE WILL ALERT YOU TO ANY RELEVANT

INFORMATION WHEN PROCESSING YOUR FWA. We keep our database up to date, and so might have more information than is available in Compass.

Communications

Please do not direct proponents to the BLM archaeologist. Instead, direct your clients to the BLM program leads for the undertaking, who are the POCs for proponents and their subcontracting environmental companies (if they are using a third party).

Please also note that BLM is the OAHF POC for BLM RGFO federal undertakings. Confusion has resulted from permittees working directly with OAHF, therefore, *all* communications, **now including the retrieval of site numbers¹**, will go through BLM. **When site numbers are needed, please contact the RGFO, but do not ask for more than needed for an individual undertaking. In the interest of efficiency, BLM will now request the SHPO doc number at the same time site numbers are requested. The reason for this is so that site numbers can be tied to BLM report numbers and names, as well as OAHF document numbers. For negative results, you may contact us for the SHPO doc number before you start working on your report.**

We have noticed that some permittees repeatedly “forget” that BLM retrieves the site numbers from OAHF. If this happens more than once with a particular permittee, BLM will retrieve new site numbers from OAHF and the permittees will be required to use the new numbers on all documentation.

When requesting site numbers from BLM, please include the site name (if there is one) and the site type. If you are requesting linear site numbers, please be sure to include the number of segments involved.

Do not send BLM a shapefile and expect BLM to extract the site information from it in order to retrieve site numbers. **If we do not receive the request in an email, we will not request OAHF site numbers until we do.**

Reporting and Finalizing

The Colorado SHPO Limited Results Cultural Resources Survey Form may be used for reports of negative inventories, or inventories during which four or fewer isolated finds were recorded.

Before starting on your post-field documentation, request the following from BLM:

- Undertaking name
- BLM number
- SHPO doc number [provide BLM with county name(s) and positive/negative results status]
- Site numbers (provide BLM with linear/non-linear status and any known site names)

¹ OAHF has indicated that some permittees are requesting larger blocks of numbers than necessary for individual undertakings. If you have any of these “archived” site numbers, please use them up, if possible, before requesting more from BLM.

Please note that when working under a BLM permit, you are substituting for us, and act as our eyes and ears. Your clients have no right to the information that you collect; they are paying you for a SERVICE, not for the information. Colorado Permit Stipulations 17 (i-1) state clearly that the permit may be suspended or revoked, and civil penalties might apply, if confidentiality is breached. Sharing the information is at BLM's discretion, not the permittee's or the client's [see, specifically, Permit Stipulation 17 (i)].

BLM Colorado PLSS Special Survey Layer Available

The PLSS Special Survey layer, which contains useful geospatial data such as historical mining claim information, is available for use. The information associated with this layer may be especially useful when conducting historical research on the gloreCORDS.blm.gov website. See Appendix I below.

Linear Recording Policy

- Newly-identified linear sites or newly-identified segments of linear sites in the RGFO will be recorded on BLM forms, tailored to the RGFO. **RGFO will provide the forms; please do not use the ones provided by SHPO.**
- The MDF, with a single county's Smithsonian number², will be used to document the site overall, and must therefore be accompanied by a map illustrating the entirety of the site (even if it must be estimated), with scale unimportant, and a narrative history. References and historic maps should also be included, if available.
- Pursuant to SHPO, please make determinations of eligibility of the entire resource based on available information, common sense, and sample survey. If after documenting that the property lacks significance under A, B, and D, it is acceptable to assume that the property is not significant under C as demonstrated by the recorded segment (especially in the eastern plains). **However, segments that fall within APEs will continue to be assessed.**
- Segments that are recorded on BLM RGFO linear segment forms will be accompanied by a map illustrating the location of the segment in the context of the site overall, as well as a 24k topo map, segment map, and photographs. Narrative information will not be necessary on the component forms, unless it supplements what has already been presented in the MDF.
- **Once an MDF has been completed for the site, a new MDF for each segment will not be necessary. For the benefit of the record, it is wise to include a copy of the original MDF in every submittal, but is not absolutely necessary. RGFO will provide examples upon request.**
- Effects:
 - A no adverse effect is found when an eligible site will be impacted, but the impact will not affect any of the characteristics of the site that render it eligible [36 CFR 800.5 (a)(1)³] (for example, if the undertaking will affect the setting of an eligible site, but the site is eligible based on its importance to history and setting is not a contributing factor in

² Per Holly McKee-Huth of OAHP.

³ "An adverse effect is found when an undertaking may alter, directly or indirectly, any of the *characteristics of a historic property that qualify the property for inclusion* in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association."

the eligibility assessment). The no adverse effect determination is the SHPO's preference, per Holly Norton.

- A no effect is found when:
 - the undertaking will not directly or indirectly impact the linear site; or
 - the linear site as a whole is ineligible; or
 - the undertaking will affect a non-supporting portion of an eligible or needs data site

Evaluating Site Integrity

Site integrity must be evaluated using the applicable "Seven Aspects of Integrity". A detailed discussion of them can be found in *National Register Bulletin 15* (starting page 44)⁴. Note that the integrity elements must be evaluated for "...the characteristics of a historic property that qualify the property for inclusion in the National Register.." [36 CFR 800.5 (a)(1)]. **Therefore, for most indigenous (prehistoric aboriginal) sites, which are generally eligible under Criterion D, only Location, Materials and Workmanship might apply (we cannot know what the original setting or feeling might have been).**

Required Report Sections

In addition to those listed in the SHPO manual, the following information must be present:

1. Direct, indirect and cumulative impacts of the undertaking.
2. A section discussing your recommended determination of effect. **Remember: the DOE applies to the undertaking as a whole, not to individual sites [36 CFR 800.4 (d)(D)(2)].**

Geospatial Data

Transmit completed *shapefiles* (RGFO will not accept **.gdb**s or **kmz**s, as they add work with **no resulting value**), including **fully-populated** attribute tables and draft documentation, to BLM (Appendix II). Because we are now supplying numbers at the draft prep stage, **attribute tables must be completed, including BLM and SHPO numbers, accurate title, site descriptions and recommended eligibility, in complete words (vs. abbreviated, e.g. NE for not eligible).**

Recently, a permittee brought to our attention the inconsistency in attribute table formats among BLM guidance. Therefore, for consistency, when working with the RGFO, please use the supplied SHPO templates and the guidance in Appendix II of this document. We will not accept shapefiles for reporting in any other format, and will not process your documentation until we receive the correctly-formatted shapefiles.

⁴ https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf

Electronic requirements are described in detail in the Digital Specification Handbook, and must be followed. Please use short, stable filenames and **DO NOT PLACE COMPRESSED (“ZIPPED”) FILES IN ANOTHER COMPRESSED FILE.**

BLM Review

We will review forms first, and will not review reports until forms review is complete, as reports often change with form revisions.

Technical editing and content review must be performed by the PI overseeing the work, prior to submitting drafts. Do not use BLM to “train” your new employees. Documents that have clearly not received either technical editing or content review will be returned immediately and will not be reviewed by BLM staff until they meet professional standards. If the RGFO is required to review more than two sets of drafts, the state program lead, who manages permits, will be alerted to the situation and will be cc’d on all communications.

Permittees must strictly adhere to Colorado permit stipulations regarding reporting. Final reports must be submitted to the BLM, not to the operator or proponent. See the highlighted paragraph on the top of Page 6 of this document in the “Reporting and Finalizing” section.

Draft documents must be in Word format and final documents must be in PDF format and compiled (not submitted in sections). The PDF review tools are very crude, and contractors often miss responding to BLM comments, because they don’t open the PDFs in the proper format to be able to review them. In addition, because contractors apply various security measures to their PDFs, we are often unable to access text (only form fields), thus creating a lot more work for the reviewers, who must re-type everything to make changes to their text. BLM’s attempts to ask for changes to these security measures has met with various levels of compliance, and even flat refusal, so we have firmed up our policy of accepting only Word documents for review. **Starting in 2022, we will now return any drafts that we receive in the PDF format.**

Please do not include blank pages in the PDF and do not lock pdf files (do not make them read only). If we need to make a slight change or add the final letter to the report, we will not be able to do so. In order to avoid adding bulk to our files, when you are asked to submit hard copies, please:

- Don't use heavyweight "fancy" printer paper.
- Don't place paper 'separators' between sets of documents when mailing hard copies.
- Don't send single-sided reports and site forms. All documentation should be double-sided.
- Do not include pages labeled “this page intentionally left blank”.

When the reports are complete, transmit final PDF files of reports and of any site forms to us. **Do not mail hard copies at present.** We will e-mail you a scanned copy of our letter to the SHPO after it has been signed. **This letter is public information, and may be shared with your client.**

Please send copies of documentation directly to other government entities (e.g., the USFS and NPS), vs. sending them to us first and having us resend them.

The RGFO will not accept CDs with site or GIS information. The data must be transferred via a direct, dedicated link to a secure cloud service, such as an FTP site.

Contact the RGFO if you need assistance. For your convenience, RGFO has set up a sharepoint location for data transmission. If you are not already using it and wish to do so, contact RGFO and we will add you to the Team.

Curation

The Royal Gorge Regional Museum and Local History Center, in Cañon City, is now able to accept BLM collections from RGFO compliance projects. Please contact Lisa Studts at (719) 269-9036 to set up a curation agreement.

In general, we ask that you collect diagnostics or unusual artifacts from BLM land. However, the policy might vary depending on the undertaking, so please contact the office if you are unsure.

Appendix I: Accessing the BLM Colorado PLSS Special Survey Layer

The entire PLSS/GCDB data may be accessed from [BLM Navigator](https://navigator.blm.gov/) :
[https://navigator.blm.gov/data?format=Compressed%20Archive%20File%20\(ZIP\)&fs_publicRegion=Colorado](https://navigator.blm.gov/data?format=Compressed%20Archive%20File%20(ZIP)&fs_publicRegion=Colorado)
It is listed as special survey:

BLM Colorado PLSS Special Survey

pub_e111fcc641429c99/BLM_CO_PLSS_SpecialSurvey.zip

Metadata

Format: Compressed Archive File (ZIP)

Published: 12/09/2019

Relevance: 1.9588292

Description: Shapefile Format "Special Surveys are non-PLSS survey areas from BLM survey records which represent federal parcels



View More Information



Appendix II: BLM Attribute Table Explanations

APPENDIX I: REQUIRED ATTRIBUTE TABLE FIELDS (UPDATED 2022)

SITE ATTRIBUTE TABLE

Attribute	Type	Definition
ID	Integer	Unique sequential numeric ID for a given spatial feature. (LEAVE BLANK)
SITE_	Text	Smithsonian site number in SHPO format (ex 5ME.4000 or 5GF.342).
SITE_NAME	Text	Name of resource, if any.
AGENCY_	Text	BLM document number (supplied by BLM).
SHPO_ID	Text	OAHP document number (supplied by BLM).
DATE	Date	Date site was digitized in GIS.
ACRES	Double	Acreage of the site calculated by GIS from the spatial features in the data set (must match site form information).
SITE_TYPE	Text	General temporal affiliation. Use: [Historic / Prehistoric / Multicomponent / Protohistoric / Unknown]
SITE_DESC	Text	Brief description of the site (use standard terminology where possible)
LINEAR	Integer	Enter 1 or 0. A "1" denotes that the site is a linear site. A "0", the default, is used for all non-linear sites.
ELIGIBILIT	Text	Resource eligibility for the NRHP. Use: [Eligible / Not Eligible / Needs Data / Supporting / Non-Supporting / Contributing / Non-Contributing] REQUIRED.
ZONE	Integer	This is the UTM zone in which the site is located.
X	Double	The X coordinate in UTM meters of the centroid of the site (can be automatically calculated by GIS..)
Y	Double	The Y coordinate in UTM meters of the centroid of the site (can be automatically calculated by GIS).
COMMENTS	Text	Any additional information not captured elsewhere.
SOURCE	Text	BLM field office name, e.g. BLM-RGFO
BND_CMPLT	Text	Refers to the completeness of the site boundary. Values for this field will either be Y (YES the boundary is complete) or N (NO the boundary of the site is not complete or unknown) or 9 if the completeness of the site boundary has not been checked.
CONF	Text	Confidence in the spatial accuracy of the digitized feature. Values for this attribute consist of LC (Low Confidence – ex: digitizing from hand drawn maps, or not field checked), HC (High Confidence –geospatial collection in the field) or P (Paleontological).
VER	Text	(LEAVE BLANK for OAHP use)
AREA	Double	Area of the spatial features in the data set (Calculate via GIS)
PERIMETER	Double	Perimeter of spatial features in the data set. (Calculate via GIS)

SURVEY ATTRIBUTE TABLE

Attribute	Type	Definition
ID	Integer	Unique sequential numeric ID for a given spatial feature. (LEAVE BLANK)
DOC_	Text	OAHP document number (supplied by BLM).
AGENCY_	Text	BLM document number (supplied by BLM).
TITLE	Text	Report title (supplied by BLM).
AUTHOR	Text	Entity responsible (e.g., BLM). Please do not list the names of individual authors, rather, the name of the permittee's company, if applicable.
DATE	Date	Leave blank.
ACRES	Double	Acreage of the APE calculated by GIS from the spatial features in the data set
SURV_TYPE	Text	Inventory strategy / survey type Use: [INTENSIVE / RECONNAISSANCE / PALEONTOLOGICAL / UNSPECIFIED]
SITE_COUNT	Integer	The total number of sites recorded during the inventory.
IF_COUNT	Integer	The total number of isolated finds recorded during the inventory.
EL_COUNT	Integer	The total number of eligible sites recorded during the inventory..
ZONE	Integer	UTM zone.
X	Double	The X coordinate in UTM meters of the centroid of the survey.
Y	Double	The Y coordinate in UTM meters of the centroid of the survey.
COMMENTS	Text	Any additional information not captured elsewhere.
SOURCE	Text	BLM field office name, e.g., BLM-RGFO
CONF	Text	Confidence in the spatial accuracy of the digitized feature. Values for this attribute consist of LC (Low Confidence – ex: digitizing from hand drawn maps, or not field checked), HC (High Confidence –geospatial collection in the field) or P (Paleontological)
VER	Text	(LEAVE BLANK FOR OAHP use)
AREA	Double	Area of the spatial features in the data set.
PERIMETER	Double	Perimeter of spatial features in the data set.