



# United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Montana State Office  
5001 Southgate Drive  
Billings, Montana 59101-4669  
[www.blm.gov/mt](http://www.blm.gov/mt)



In Reply Refer To:  
3100 (MT9221.CB)

October 19, 2012

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

## DECISION

Guthals, Hunnes & Reuss, P.C.  
Attorneys at Law  
P.O. Box 1977  
Billings, Montana 59103-1977

### PROTEST DISMISSED IN PART AFFIRMED IN PART

#### I. INTRODUCTION

On July 25, 2012, a Lease Sale Notice for the October 23, 2012, Competitive Oil and Gas Lease Sale was posted, which initiated a 30-day protest period. An Oil and Gas Leasing Environmental Assessment (EA), updated after a 30-day public comment period, was made available at the same time as the October Oil and Gas Lease Sale Notice.

In a letter to the Bureau of Land Management (BLM) dated August 23, 2012, the law firm of Guthals, Hunnes & Reuss, P.C., submitted a timely protest on behalf of Ms. Barbara Holman Morse (Enclosure 1) (hereafter known as the Protestor) to the inclusion of two (2) parcels which are located in Stillwater County, Montana, and are identified as Parcel Numbers 10-12-01 (MTM 102757-WD) and 10-12-02 (MTM 102757-WE) on the lease sale. The parcel number, size, and detailed locations, and associated stipulations are listed in the EA, Appendix A. Ms. Holman Morse is a split-estate (private surface with Federal mineral estate) land owner in Stillwater County, Montana. Approximately 280 surface acres out of 440 acres within the two parcels subject to this protest are owned by Ms. Holman Morse.

#### II. BACKGROUND

Public scoping for this lease sale was conducted through a 15-day scoping period advertised on the BLM Montana State Office website and posting on the Billings Field Office (BiFO) website National Environmental Policy Act (NEPA) notification log, reference number DOI-BLM-MT-0010-2012-21-EA. Scoping was initiated March 26, 2012 through April 09, 2012. Surface owner notification letters were also distributed briefly explaining the oil and gas leasing and planning processes. The surface owner notification letter requested written comments regarding any issues or concerns that should be addressed in the EA being prepared for the parcels.

A total of 87 surface owner notification letters were distributed for the oil and gas leasing analysis process in the BiFO. The written and verbal communication resulted in numerous telephone inquiries, and a total of three (3) comments pertaining to this EA from private surface owners. Scoping comments were also received from the Montana Department of Fish, Wildlife and Parks (MFWP), as well as, the Montana (MT) Trout Unlimited.

Of the three (3) written comments from the private surface owners: one comment informed BLM of infrastructure in place on the nominated lands, one questioned the quality of the oil that had been found on their land in the past, and one informed BLM of the potential for a coal mine to be developed in the vicinity of the nominated parcels. Our review of the EA shows that the Protestor did not provide any comments during the scoping process. The MFWP and MT Trout Unlimited provided information to the BLM regarding wildlife resources that currently exist on or near the nominated parcels.

On May 21, 2012, the BLM Montana/Dakotas released the Billings Field Office Oil and Gas Leasing Environmental Assessment EA for a 30-day public comment period. The EA assessed the BLM's decisions regarding 179 parcels (85,441.71 Federal mineral acres) nominated for leasing on the October 23, 2012 Competitive Oil and Gas Lease Sale. Due to four key factors (quality of affected habitat; recent research funded in part by the BLM; ongoing conservation efforts by other Federal agencies; and impending release of an updated BiFO RMP), some of the parcels were considered but not fully analyzed in the EA. The EA determined that 360 acres of Parcel Numbers 10-12-01 (MTM 102757-WD) and 10-12-02 (MTM 102757-WE) are located within 0.5 miles of Yellowstone Cutthroat Trout (YCT) suitable habitat. At that time, the decision was made to defer the 360 acres of the aforementioned parcels. The remaining 38 parcels (12,868.78 acres of Federal minerals) received a careful and reasonable review of relevant environmental concerns.

The Law Firm of Guthals, Hunnes & Reuss, P.C., on behalf of the Protestor provided written comments on the EA by letter dated June 19, 2012 (Enclosure 2). Any Public comments received during this process were incorporated and addressed in the EA. The EA was updated and posted on July 25, 2012, on the BLM's Montana/Dakota website.

Based upon recommendations from the Billings Field Office (BiFO) Manager, a total of 23 parcels (8,995.83 acres of Federal minerals) would be offered for lease at the October 23, 2012 Competitive Oil and Gas Sale with lease stipulations and/or lease notices as necessary for lease issuance.

Portions of Parcel Numbers 10-12-01 (MTM 102757-WD) and 10-12-02 (MTM 102757-WE) would be offered with the following stipulations:

- Controlled Surface Use CSU 12-1;
- Timing Limitation TL 13-1;
- Timing Limitation TL 13-2;
- Threatened and Endangered Species TES 16-2;
- Cultural Resources CR 16-1;

- Lease Notice LN 14-2; and
- Lease Notice 14-12.

Complete definitions of these stipulations can be found at the following website:

[http://www.blm.gov/mt/st/en/prog/energy/oil\\_and\\_gas/leasing/stipulations.html](http://www.blm.gov/mt/st/en/prog/energy/oil_and_gas/leasing/stipulations.html)

The remaining 171 parcels containing approximately 76,445.35 acres, in whole or part, would be deferred, including 120 acres from the parcels originally nominated on the Protestor's property. The deferrals are due to valuable wildlife habitat or in areas under consideration for designation as Areas of Critical Environmental Concern and are pending further review in the revised BiFO Resource Management Plan (RMP).

Furthermore, when and if the BLM receives an Application for Permit to Drill (APD), the surface owner will be invited to an onsite inspection which occurs before BLM completes the review of the APD. The BLM includes mitigation measures developed at the time of lease exploration or development and attaches these measures as Conditions of Approval (COA) to the approved APD.

### III. PROTEST ANALYSIS

**Protest Summary:** The Law Firm of Guthals, Hunnes & Reuss, P.C., on behalf of the Protestor, submitted a timely protest (via fax) on August 23, 2012, followed by hard copy received August 24, 2012, to the inclusion of two (2) parcels identified as Parcel Numbers 10-12-01 (MTM 102757-WD) and 10-12-02 (MTM 102757-WE) on the October 23, 2012 Competitive Oil and Gas Lease Sale.

### PROTEST CONTENTIONS AND BLM RESPONSE

#### A. The Protestor expressed concerns that BLM did not respond to the comments provided to the BLM in the June 19, 2012 Public comment letter.

BLM Response: In accordance with BLM Handbook 1790-1, Section 6.9.2, comments may be addressed in the EA or Decision Record (DR). The comments and BiFO responses can be found in the EA, Section 5.2. Addressing comments in the body of the EA is a standard BLM practice, and fulfills the requirements set forth in BLM Handbook 1790-1.

#### B. The Protestor contends that an Environmental Impact Statement (EIS) should be completed due to the sensitivity of the environment and cumulative impacts from development of the leases.

BLM Response: This comment was raised by the Protestor during the EA process. The BiFO responded to this general issue by addressing the specific resource issues raised in the Protestor's comment letter on pages 97-100 of the EA. The EA prepared for the October 23, 2012 Competitive Oil and Gas Lease Sale took the requisite 'hard look' at the possible direct,

indirect, and cumulative impacts from leasing the parcels, and the BLM reasonably concluded that the leases would have no significant impacts other than those already addressed in existing RMPs or EISs. Further, the “likely incremental impacts” mentioned in the protest are considered in the EA. These impacts are based on projections addressed in the current Reasonably Foreseeable Development (RFD) scenarios for oil and gas resources presented for the BiFO planning area. The RFD provides temporal, spatial and intensity assumptions of surface disturbance for projected development of oil and gas resources and is based on peer-reviewed research and past, present and projected development using the best currently available data. The RFD can be found at Appendix C of the EA.

**C. The Protestor contends the lease sale should be deferred until the BiFO RMP and EIS is revised to avoid unnecessary surface damage to her property.**

BLM Response: This comment was raised by the Protestor during the EA process. The BiFO responded to this general issue by addressing the specific resource issues raised in the Protestor’s comment letter on pages 97-100 of the EA. As you note, the BLM is in the middle of revising the BiFO RMP. The parcels identified by the Protestor are on split estate lands where the reserved Federal minerals are open to leasing according to the existing RMP. Similar protest arguments regarding lease parcels being sold while the RMP is being revised were rejected in the IBLA Order dated July 31, 2002, Wyoming Outdoor Council, et al. (IBLA 2002-303). The Order cites Sierra Club Legal Defense Fund, Inc., 124 IBLA 130, 140 (1992), wherein the Board rejected the argument that BLM must suspend an action that is in conformance with an existing land use plan when it decides to prepare a new plan. IBLA recognized that acceptance of protestor’s position would seriously impair the BLM’s ability to perform its land management responsibilities.

The IBLA also pointed out in their order dated July 31, 2002, that neither the BLM Handbook (H-1601-1), Land Use Planning, nor WO IM No. 2001-191, Processing of Application for Permit to Drill, Site-Specific Permits, Sundry Notices, and Related Authorizations on Existing Leases, and Issuing New Leases During Resource Management Plan Development, absolutely preclude issuance of oil and gas leases while the underlying RMP is being amended. Rather, the BLM Handbook states existing decisions remain in effect during the amendment process and directs the BLM to review all proposed implementation actions through the NEPA process to determine whether the approval of a proposed action would harm resource values and limit the choice of reasonable alternatives in the land use plans being re-examined.

WO IM No. 2004-110 replaced all discussion pertaining to oil and gas leasing contained in WO IM No. 2001-191. WO IM No. 2004-110, Change 1, provides that lands, which are open for leasing under an existing RMP, may be leased during a revision or amendment process when BLM management determines there are no significant new circumstances or information bearing on the environmental consequences of not leasing within the broad scope analyzed in an existing RMP EIS.

The Council on Environmental Quality regulations do not require postponing or denying a proposed action covered by the EIS for the existing land use plan in order to preserve

alternatives during the preparation of a new land use plan and EIS (40 CFR 1506.1(c) (2)), as long as the action does not prejudice the ultimate decision on the program or limit alternatives.

Prior to offering for sale any of the parcels, an EA was completed to determine whether offering the parcels was consistent with the existing RMP, whether there was new information not previously analyzed that might question whether leasing was still appropriate, or whether offering the parcels for sale would limit the choice of reasonable alternatives in the RMP that is being revised.

That being said, Parcel Numbers 10-12-01 (MTM 102757-WD) and 10-12-02 (MTM 102757-WE) have been reviewed in response to the protest (refer to Section III, PROTEST ANALYSIS, (E), of this Protest Decision).

**D. The Protestor contends there is inadequate information and analysis of soil reclamation suitability in the EA.**

BLM Response: This subject was included in the Protestor's comments on the EA and the BiFO addressed this comment on Page 97 of the EA. Soils are adequately discussed in the EA on pages 21-22 and 66-67. Further, the Controlled Surface Use CSU 12-1 stipulation adequately protects those areas with soil characteristics that may affect the ability to properly reclaim areas disturbed as a result of oil and gas operations. Prior to finalization of the EA, the stipulation applied to 280 acres in Parcel Numbers 10-12-01 (MTM 102757-WD) and 10-12-02 (MTM 102757-WE). However, based upon the outcome of this Protest Decision, this oil and gas lease stipulation now applies to 80 acres (MTM 102757-WD, Sec. 12, N2SW) or approximately 33 percent of the 240 acres that will be offered for leasing during the October 23, 2012 Competitive Oil and Gas Lease Sale. This stipulation requires BLM approval of an engineering/reclamation plan for any surface disturbing activity on slopes greater than 30 percent. The engineering/reclamation plan must demonstrate how the following will be accomplished:

- Site productivity will be restored;
- Surface runoff will be adequately controlled;
- Off-site areas will be protected from accelerated erosion, such as rilling, gullyng, piping, and mass wasting;
- Water quality and quantity will be in conformance with state and Federal water quality laws;
- Surface-disturbing activities will not be conducted during extended wet periods; and
- Construction will not be allowed when soils are frozen.

The soil reclamation suitability ratings are a composite index of several soil characteristics known to aid in the success of reclamation. The reclamation suitability ratings are used to inform the decisionmaker of the likelihood of the success of future reclamation; they are not utilized to determine whether or not a parcel should be leased. An in-depth analysis of reclamation would occur when and if an APD is filed. If the site specific analysis associated

with an APD indicated an issue with reclamation potential, mitigation measures would be applied, including the relocation of the development to an area with soils that do not inhibit the ability to properly reclaim areas disturbed.

**E. The Protestor supports the deferral of parcels within 0.5 miles of Yellowstone Cutthroat Trout (YCT) Suitable Restoration Habitat, but believes that a greater deferral distance is warranted.**

BLM Response: This subject was included in the Protestor's comments on the EA and the BiFO addressed this comment on Page 97 of the EA. However, after further review, we agree with the Protestor's contention that portions of the parcels subject to this protest are within 0.5 miles of YCT suitable restoration habitat as delineated by Montana Fish, Wildlife and Parks (MFWP). This degree of vegetation buffer is more than adequate (e.g., see review by Ellis 2008<sup>1</sup>) for habitat conservation of YCT, especially considering YCT do not currently inhabit the streams associated with the parcels under protest. The current BiFO RMP does not have specific stipulations for YCT streams, however, they are being considered in the draft RMP Revision. The MFWP manages the actual fish and wildlife species in the State of Montana, and that agency will decide when and if YCT will be restored to streams with suitable recovery habitat.

Therefore, the protest is affirmed on the contention that portions of the parcels in question are within 0.5 miles of YCT suitable habitat and portions of the parcels within 0.5 miles of YCT suitable restoration habitat will be deferred. Once this RMP revision is finalized and a Record of Decision is published, these parcels will be re-evaluated for conformance with the RMP and their availability for leasing.

**F. The Protestor states that parcels 10-12-01 (MTM 102757-WD) and 10-12-02 (MTM 102757-WE) are located in sub-irrigated meadows and does not believe that the EA adequately addresses or analyzes riparian or wetland areas, nor is there analysis of the efficacy or need for water monitoring.**

BLM Response: This subject was included in the Protestor's comments on the EA and the BiFO addressed this comment on Page 98 of the EA. The subject protest contention is moot since all parcels located in sub-irrigated meadows will be deferred due to their proximity to YCT suitable restoration habitat.

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<sup>1</sup> Ellis, J.H. 2008. Scientific Recommendations on the Size of Stream Vegetated Buffers Needed to Protect Fish and Aquatic Habitat, Part Two, The Need for Stream Vegetated Buffers: What Does the Science Say? Report to Montana Department of Environmental Quality, EPA/DEQ Wetland Development Grant. Montana Audubon, Helena, MT. 20 pp. Gresswell, R.E. 2011. Biology, Status, and Management of the Yellowstone Cutthroat Trout. *North American Journal of Fisheries Management*. 31:5. 782-812

**G. The Protestor states that the EA does not contain adequate study or process to determine the anticipated, or the anticipated cumulative effect, on wildlife or its habitat from the proposed leasing and subsequent development. The Protestor further states their belief that the BLM should not wait to consult with the United States Fish and Wildlife Service (USFWS) until after leasing occurs.**

BLM Response: This subject was included in the Protestor's comments on the EA and the BiFO addressed this comment on Page 98 of the EA. Pages 71-78 of the EA contain extensive analysis of the potential effect of the proposed action on wildlife and its habitat. Page 72 presents a discussion of past USFWS consultation efforts and a summary of their determinations related to leasing actions. The referenced parcels, 10-12-01 (MTM 102757-WD) and 10-12-02 (MTM 102757-WE), are both located outside of the Grizzly Bear Recovery Zone and the designated Critical Habitat for Canadian Lynx. Regardless of the previous determinations, each of the referenced parcels has a stipulation applied to it that notifies the lessee of the potential for listed species to occur and the potential for further consultation with the USFWS.

In addition, the EA includes an analysis of anticipated cumulative impacts on pages 87-95. This analysis considers past, present and potential future activities, including projections of oil and gas development activity. Page 93 includes the following regarding cumulative impacts to wildlife and the level of oil and gas activity projected for the planning area.

“With the addition of various forms of stipulations, mitigation, and terms and conditions applied during the development stage, the assessed resources of concern are not expected to approach conditions where additional stresses associated with the proposed action and, past, present and future foreseeable actions would have consequential cumulative effects.

As described in the section on impacts to wildlife, given the current RFD of 13.5 to 27 acres of surface disturbance per year, impacts to wildlife species would be negligible or minimal at most. If significantly higher levels of development occur, further NEPA analysis would be required to determine impacts to wildlife resources. Additionally, analysis during the APD phase of development would identify specific impacts that cannot be identified or quantified at this time.”

**H. The Protestor states that the area is aesthetically pleasing and that the BLM should properly consider visual impacts.**

BLM Response: This subject was included in the Protestor's comments on the EA and the BiFO addressed this comment on Page 99 of the EA. The BLM lacks authority to apply Visual Resource Management classification and associated restraints on private land. Planning decisions, including the designation of Visual Resource Management classification areas, does not apply to the subject parcels since the surface estate is privately owned. However, managing aesthetic resources is a high priority for the BLM and visual impacts on

private lands are mitigated with the use of mandatory Best Management Practices (BMPs) and guidance provided from the BLM 8400 Manual Series (Visual Resources Management).

BMPs are state-of-the-art mitigation measures applied to oil and natural gas drilling and production to help ensure that energy development is conducted in an environmentally responsible manner. BMPs protect wildlife, air quality, and landscapes as we work to develop vitally needed domestic energy sources.

Some BMPs are as simple as choosing a paint color that helps oil and gas equipment blend in with the natural surroundings, while others involve cutting-edge monitoring and production technologies. All are based on the idea that the "footprint" of energy development should be as small and as light as possible.

We refer you to the BLM Gold Book, Chapter 5, Visual/Scenic Resources to include paint color; aesthetic siting of roads, well locations and production facilities. Ultimately, the private surface owner may identify ways to mitigate visual and scenic resource issues through the surface use agreement that the lessee negotiates prior to development.

The Gold Book can be found at the following website:

[http://www.blm.gov/wo/st/en/prog/energy/oil\\_and\\_gas/best\\_management\\_practices/gold\\_book.html](http://www.blm.gov/wo/st/en/prog/energy/oil_and_gas/best_management_practices/gold_book.html)

As stated earlier, when and if an APD is received by the BLM, the surface owner will be invited to an onsite inspection which occurs before BLM completes the review of an APD.

**I. The Protestor states their belief that the lease sale should be deferred to allow adequate time to provide and accommodate Native American concerns and the concerns of the private land owners.**

BLM Response: This subject was included in the Protestor's comments on the EA and the BiFO addressed this comment on Page 99 of the EA. Native American coordination and consultation is an ongoing process which does not end with the conclusion of this EA; rather it runs along a parallel track. Tribes with affinity to this area have been contacted. Interested local Tribes are evaluating the information that has been provided to them and deciding if they have a need for additional information or if they have any concerns to bring forward. Private land owners have been afforded the opportunity to voice their concerns through the NEPA process.

**J. The Protestor calls attention to the lack of information in the EA regarding residences and businesses in proximity to parcels 10-12-01(MTM 102757-WD) and 10-12-02 (MTM 102757-WE).**

BLM Response: This subject was included in the Protestor's comments on the EA and the BiFO addressed this comment on Page 99 of the EA. The BLM does not possess a complete listing of all infrastructure and improvements on private land. It is assumed that the private surface owner will resolve these issues with the eventual lessee when they negotiate a surface

use agreement. The indirect effects of eventual development on residences are disclosed in a programmatic manner of page 85 of the EA. Site specific impacts to businesses and residences would be analyzed once a site specific proposal for exploration or development is received. There are no known residences or businesses on any of the lease parcels subject to this protest.

**K. The Protestor calls attention to the lack of analysis of access to the proposed parcels with roads that would accommodate commercial and emergency vehicles.**

BLM Response: This subject was included in the Protestor's comments on the EA and the BiFO addressed this comment on Page 99 of the EA. Issuance of a Federal oil and gas lease only guarantees the lessee the right of access on the leased area itself; in split estate situations the specific manner and location of the access is negotiated with the private surface owner. The physical properties of the lease parcels have been reviewed and lease stipulations have been applied where necessary (particularly for steep slope areas). Issues related to accessing the leased area, where crossing private property, are subject to negotiations between the lessee and the adjoining land owners. A review of the area indicates a developed road network in proximity to the subject lease parcels and access opportunities that would only require the use of existing trails or new access construction for short distances from the developed road network. The BLM would consider the impacts of access in a site specific environmental analysis, regardless of the ownership involved with access routes, if and when an APD is proposed to develop the lease.

**L. The Protestor calls attention to the lack of analysis of the effect on agricultural areas from future oil and gas development.**

BLM Response: This subject was included in the Protestor's comments on the EA and the BiFO addressed this comment on Page 100 of the EA. As noted in table 1 on page 10 of the EA, there are no prime or unique farm lands within the lease parcel area. It is unknown if there will be impacts to agricultural areas until such time that an APD has been filed. Assumed levels of impacts are expected to occur based upon the reasonably foreseeable development scenario found in Appendix C. It is possible that some of these impacts may occur in agricultural areas; however, the portions of the subject parcels that will be offered for lease do not exhibit any cultivated or sub irrigated lands.

**M. The Protestor requests a No Surface Occupancy (NSO) stipulation be placed on the parcels if the lease sale proceeds as scheduled, or any future lease sales.**

BLM Response: This comment was not raised by the public or other parties during the EA process. The stipulations described in the EA, and Appendix A and B adequately protect the environment. Furthermore, the Protestor has not provided any rationale to justify applying an NSO lease stipulation on the entire lease parcel area subject to this protest.

#### IV. CONCLUSION

In conclusion, the Protestor requested that the BLM defer inclusion of two (2) parcels identified as 10-12-01 (MTM 102757-WD) and 10-12-02 (MTM 102757-WE) in the October 23, 2012 Competitive Oil and Gas Lease Sale pending completion of an EIS and revision of the RMP. The Protestor suggested that there has not been proper analysis of soil reclamation suitability, impacts to wildlife, agriculture, visual resources, Native Americans, and the local public.

**For the reasons stated above, the BLM Dismisses In Part and Affirms In Part this protest. The outcome of this Decision on the specific areas subject to this protest is identified below.**

The BLM, in accordance with existing regulations and policies, will issue leases for all the lands receiving competitive bids or noncompetitive offers included on the October 23, 2012 Competitive Oil and Gas Lease Sale Notice.

##### MTM 102757-WD

###### **Defer:**

T. 5 S, R. 16 E, PMM, MT  
SEC. 12 S2SW, W2SE;  
SEC. 14 NWNE, S2NE  
STILLWATER COUNTY;  
280.00 AC  
PD

###### **Offer:**

T. 5 S, R. 16 E, PMM, MT  
SEC. 12 SENW, N2SW  
STILLWATER COUNTY  
120.00 AC  
PD

##### MTM 102757-WE

###### **Defer:**

T. 5 S, R. 17 E, PMM, MT  
SEC. 7 NESW, N2SE;  
SEC. 17 NWNE, E2NW, NESW;  
STILLWATER COUNTY  
280.00 AC  
PD

###### **Offer:**

T. 5 S, R. 17 E, PMM, MT  
SEC. 17 NENE, S2NE  
STILLWATER COUNTY  
120.00 AC  
PD

## **Administrative Review and Appeal**

This Decision may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations contained in 43 CFR Part 4 (Enclosure 3) and the enclosed Form 1842-1 (Enclosure 4). If an appeal is taken, the Notice of Appeal must be filed in the Montana State Office at the above address within 30 days from receipt of this Decision. The appellant has the burden of showing that the decision appealed from is in error.

If you wish to file a petition for a stay pursuant to 43 CFR Part 4, Subpart B § 4.21, during the time that your appeal is being reviewed by the Board, the petition for a stay must accompany your notice of appeal. A petition for a stay must show sufficient justification based on the standards listed below. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

### Standards for Obtaining a Stay

Except as otherwise provided by law or other pertinent regulations, a petition for a stay of a decision pending appeal shall be evaluated based on the following standards:

1. The relative harm to the parties if the stay is granted or denied;
2. The likelihood of the appellant's success on the merits;
3. The likelihood of immediate and irreparable harm if the stay is not granted; and
4. Whether the public interest favors granting the stay.

/s/ Jamie E. Connell

Jamie E. Connell  
State Director

### 4 Enclosures

- 1-Protest Letter Dated August 23, 2012 (8 pp)
- 2-Public Comment Letter dated June 19, 2012 (3 pp)
- 3-43 CFR 4.21(a) (2 pp)
- 4-Form 1842-1 (1 p)