

**Osage Operators Environmental Reference Manual Update Process**  
**March Stakeholder Meetings**  
**Osage County Cattlemen's Association**

**March 4, 2014**  
**Osage Casino, Skiatook, Oklahoma**  
**Draft Meeting Summary**

The Osage Minerals Council and the Osage Cattlemen's Association met, along with relevant federal and state agencies, to discuss the first draft of the updated Environmental Reference Manual. The following is a summary of those discussions.

**Introductions and Opening Remarks**

The meeting opened with a prayer. Representatives from the Osage Minerals Council, the Bureau of Indian Affairs, the Environmental Protection Agency, and the Osage County Cattlemen's Association each made opening statements:

- Andrew Yates, Chairman of the Osage Minerals Council thanked all parties for attending the meeting. He noted that many parties worked together to develop the 1997 Manual and handbook and that they have been very useful resources over the past 17 years. Since that time, there have been many updates in operations and understanding around environmental and health issues and that now is the time to update the Manual accordingly.
- Eddie Streater, Deputy Regional Director, BIA Eastern Oklahoma Regional Office, thanked all parties for attending the meeting. He expressed hope that all stakeholder groups could work together to create a useful document.
- Christina Kracher, Tribal Consultation Advisor, EPA Region 6 thanked all parties for coming to the table today and putting in the time and effort to raise these issues. She said that the EPA is looking to create a working document that works for the Cattlemen as well as other stakeholders.
- Jeff Henry, President of the Osage County Cattlemen's Association (OCCA), thanked BIA and EPA for including the OCCA in the Manual revision process. He said that the OCCA is hoping to create a strong working document that includes specific guidance for handling specific situations, such as spills and other adverse events and that can serve as a resource for landowners to help them when they deal with issues.

Other meeting participants also introduced themselves. A full list of individuals in attendance can be found in Appendix A.

## **Review of the Manual Revision Process Guidelines**

Patrick Field, facilitator with the Consensus Building Institute, reviewed the process guidelines governing the Manual revision process. Reading from the guidelines, he stated:

Revision of the Manual is intended to provide guidance on how to comply with current environmental laws and regulations governing oil and gas operations within Osage County. The Manual will also provide clarification on which agencies should be contacted in the event someone has concerns regarding those gas and oil operations. The objective of the Manual is to provide clear, useful guidance and best management practices for daily responsibilities concerning gas and oil operations in Osage County.

Mr. Field also noted that the Manual is not intended to provide legal advice, the Manual revision process is not intended to create new regulations, and that ownership and management of the mineral estate of Osage County is highly unique. He explained that the Manual update process is neither designed nor intended to seek consensus among stakeholders; rather, EPA and BIA are soliciting comment and input from stakeholders and will decide independently on revisions. Mr. Field also reviewed the role of the facilitators to serve as neutral facilitators of the process and to draft meeting summaries, without attribution, of each meeting, which will be sent to representatives of relevant stakeholder groups for review prior to publication. Mr. Field also summarized the timeline and future meetings in the Manual revision process. The process guidelines can be found at the following URL: <http://bia.gov/cs/groups/xregeasternok/documents/text/idc1-025587.pdf>.

## **General Process Concerns from the Cattlemen's Association (OCCA)**

Representatives from the Osage County Cattlemen's Association (OCCA) articulated their overarching concerns and questions around the Manual update process.

- The OCCA expressed concern that the process was out of sequence due to the fact relevant and new regulations under the CFR's will not be available during this revision. In response to the question about when updated regulations governing oil and gas operations in Osage County would be available [as created during the 2013 Negotiated Rulemaking process], a BIA representative explained that the draft regulation are still under internal review by the Department of the Interior, which is hoping to promulgate the new regulations by end of 2014. The BIA representative noted that many of the topic areas that are likely of interest to OCCA were not proposed to be revised during the Negotiated Rulemaking process and so may stay the same between the current and

the proposed regulations. As such, the parties should be able to discuss these areas and the discussions should still be applicable to the revised regulations.

- The OCCA expressed concern about enforcement of any regulations or best practices, given the history of weak enforcement, in their view, in Osage County. A BIA representative explained that, based on the Department of the Interior's legal experience with similar Manuals, much of the content of the Manual would be guidelines and would not be enforceable by government agencies. Ultimately, enforcement responsibility legally lies with the Superintendent of the Osage Agency.
- An OCCA representative stated that the organization is not looking for the Manual to prescribe specific technical rules. It would, however, like the Manual to articulate specific processes that operators should follow in case of adverse events, such as spills. In addition, the OCCA would like to see the remediation documented and quantified. In response, a BIA representative said that the agencies are hoping to come to an agreement on what that process should be such that the Superintendent could determine whether or not the operator followed the appropriate steps.
- OCCA representatives asked for clarification about the Manual revision and stakeholder participation process. In response, a BIA representative explained that, in order to meet the requirements of the Federal Advisory Committee Act (FACA), BIA and EPA are taking comments from stakeholders, which they will then consider in revising the Manual, and are not seeking to reach consensus decisions with the public. The agencies are hoping that the stakeholder groups can reach their own agreements about various provisions and provide joint recommendations to the agencies that the agencies would then, more likely, incorporate into the Manual. The BIA representative added that the agencies are planning to create an updated draft of the Manual by the April public meeting that may respond to some of the suggestions made by stakeholders.
- An OCCA representative explained that the organization is concerned about devoting resources to the Manual update process without certainty as to how its input will be incorporated and asked why the Manual update process is not a FACA process. In response, a BIA representative explained that agencies have a limit on how many FACA committees they can convene simultaneously, and that the costs and timeframe for FACA processes are very extensive. BIA just convened a FACA committee for Osage for the CFR revisions, making it unlikely that the agency would convene another one at this time for a non-regulatory document like the Manual. The representative also explained that White House approval is needed for all FACA committee members and that there was an eight-month delay clearing committee members for the Negotiated Rulemaking, for instance. The Manual revision process would proceed more quickly and efficiently by not creating a FACA, thereby addressing stakeholder concerns more quickly.

- The facilitator, Mr. Field, noted that there will be check-in points as the process proceeds and that, ultimately, the extent of the agencies' commitment to including stakeholder input would be shown by their revisions to the Manual.

### **Purpose and Intent of the Manual**

Representatives from the Osage Minerals Council, the Bureau of Indian Affairs, the Environmental Protection Agency, and the Osage County Cattlemen's Association each explained their organization's perspective on the intent and audience of the Manual as well the revision and update process.

- EPA representatives explained that most of the revisions already proposed in the "February 2014" version of the draft revised Manual are simple logistical updates of phone numbers and other items that have changed since the Manual was first created in 1997. In addition, EPA also added whole new sections on Spill Prevention Control and Countermeasures (SPCC) and on the Clean Air Act, which were not included in the 1997 Manual. They stated that the 1997 Manual was created solely with operators in mind, and that the current revision will add additional content to meet the needs of landowners, headright holders and restricted landowners, and others. Working from the text of the 1997 Manual, as opposed to starting from scratch, will save a lot of time and energy because much of the needed content is already present in the 1997 Manual.
- BIA representatives echoed EPA's comments about the merits of working from the 1997 Manual as opposed to starting from scratch. In addition, they stated support and agreement for the OCCA's goals of specifying processes for handling spills and reporting. The Osage Agency has not had adequate processes in place, and so this process can help to remedy that shortcoming.
- A representative from the Osage Minerals Council stated that the Council's primary interest in the Manual is to provide operators with clear guidelines for those areas that the Manual covers.
- Osage County Cattlemen's Association (OCCA) representatives said that they recognized that the primary audience of the Manual would continue to be operators but that they would like the Manual and Handbook to also be easily understandable by landowners and others without a technical background in minerals development. OCCA representatives also called for the establishment of clear standards and neutral ground rules so that it could be easily determined what operators are supposed to do and when they are out of compliance with those standards. For example, recognized thresholds and standards for salinity levels, and for post-remediation conditions would make it easier to establish whether an operator has met agreed-upon standards for remediation. Established standards of this sort exist in other jurisdictions and adopting

those sorts of standards in Osage County would significantly reduce arguments and disagreement between producers and landowners. As a result, OCCA could move away from constantly playing a “watchdog” role and allow the Osage Agency to impartially make sure that the agreed-upon standards are being met.

### **Sequencing of Manual Topics and Scope of the Manual**

Representatives of the Osage County Cattlemen’s Association (OCCA) suggested that the contents of the revised handbook be ordered to reflect the chronological order of the oil and gas development process. That is, the handbook would progress from landowner notification and inception of drilling through the various stages of well development and would conclude with plugging the well. Ordering the Manual in this way would help landowners better understand the development process and be able to anticipate at each step of the process. OCCA representatives suggested that the sequence followed by the BLM Gold Book, which is the chronological order described above, could also be an appropriate sequence for the revised Osage Operators Environmental Reference Manual.

OCCA representatives also made suggestions to bring the Manual into alignment with the full scope of the oil and gas development process. They commented that the draft revised Manual only seems to cover areas under EPA jurisdiction, not those under BIA jurisdiction. They inquired whether operational areas under BIA jurisdiction, such as the well drilling process, would also be covered in the handbook. OCCA representatives also suggested that there are sections in the BLM Gold Book that could be adopted into the Osage Manual, particularly around operational areas such as drilling a well. If the Manual is intended to be a best-practices guide for producers, landowners, and others in Osage County, then the Manual should cover all aspects of the oil and gas development process and could draw from the best resources currently available, such as the BLM Gold Book, Oklahoma Corporation Commission guidelines, American Petroleum Institute guidelines, etc.

Osage Minerals Council and Bureau of Indian Affairs representatives responded by noting that the Manual update process needs to rely on the regulations that are currently in effect, not the proposed draft regulations that were created during the Negotiated Rulemaking process and that are currently under review by the Department of the Interior. An OCCA representative suggested that the revision of the Manual should probably take place after the new regulations are enacted so that the Manual can incorporate material about landowner notification and regulations governing hydrogen sulfide that are included in the proposed regulations. A BIA representative responded that, because the scope of the Manual is limited to areas such as creating and improving processes for handling spills, and because the relevant language would most likely be carrying over from the current regulations to the proposed regulations, the

Manual revision process should not be hindered by the fact that new regulations may be promulgated.

OCCA representatives also stated that they saw an inextricable linkage between dealing with adverse incidents after the fact and specifying operating procedures and standards (for operational areas such as drilling production wells, setting well casing, etc.) in order to minimize the likelihood of occurrence of adverse events. As such, they called for including operational standards and best practices in the Manual. An OCCA representative suggested that, just as the section on Underground Injection Control wells in the draft Manual is quite technically detailed, similar guidance could be provided for production wells. This sort of guidance could be especially helpful for the smaller operators in Osage County.

In response, BIA representatives explained that production operations such as drilling and casing of wells are governed by the regulations in effect for Osage County. Those regulations specify that operations should be performed according to accepted industry standards and that if landowners are concerned that a producer is not operating in a “prudent, workmanlike manner,” as specified in the regulations, then they have the prerogative to complain to the Osage Agency Superintendent. A BIA representative also explained that federal regulations governing production in Osage County are in place to protect the interests of the United States and its trust responsibility for the Osage mineral estate. The primary purpose of the regulations is to further the government’s fiduciary duty to the headright holders. While the government is willing to consider ideas that could improve operations and outcomes for other parties, including landowners, the government’s primary responsibility is in maximizing the value of the mineral estate while in compliance with applicable laws. BIA and EPA representatives also explained that the reason that the draft Manual has a detailed section on Underground Injection Control wells and not on production wells is because the former type of well falls under EPA jurisdiction under the Safe Drinking Water Act.

While the EPA has laid out detailed guidance around constructing these types of wells, production wells fall under BIA authority and the latter agency simply specifies that producers operate in a “prudent, workmanlike manner.” This phrase effectively means that producers should operate in line with industry standards, as interpreted by the Osage Agency Superintendent. Finally, an EPA official suggested that it may be productive for the OCCA to speak with the Osage Producers Association to see if the two associations could reach a common understanding and agreement on production practices such that EPA and BIA could consider incorporating the substance of such an agreement into the Manual.

## **Joint Review of the Manual**

Meeting participants discussed each section of the draft Manual as they are currently laid out. Detailed comments by section are listed below.

### *Section: I. Important Contact Information*

Meeting participants from the Bureau of Indian Affairs (BIA), Environmental Protection Agency (EPA), Osage Minerals Council (OMC), Osage County Cattleman's Association (OCCA), Oklahoma Department of Environmental Quality (DEQ) discussed how to streamline this section to reduce the number of points of contact provided and reduce confusion about which agencies to call under different circumstances. Agency representatives agreed that current reporting protocols for adverse events, such as spills, are currently unclear and may be unnecessarily duplicative, and agreed to try to simplify the section by minimizing the number of points of contact (hopefully identifying a single point of contact), empowering that contact to sort out jurisdictional issues, and contacting other agencies as needed. Parties also agreed that any spills that impact waterways should be reported. Participants also agreed to include language indicating what procedures should be followed in case of impact on protected species under federal and state law.

### *Section: II. Water Pollution Prevention: The Clean Water Act*

Parties reiterated the conclusion that, due to the complicated and case-specific nature of federal water law, operators should report any spills that affect waterways to the appropriate reporting point (which will be specified), even if the operator is not sure if the waterway in question triggers federal jurisdiction. Such jurisdictional determinations are complex and case-specific.

### *Section: III. Injection Well Requirements*

An EPA representative explained that this section, on injection well requirements, is the most detailed section of the Manual because it follows the process-driven protections enshrined in the Safe Drinking Water Act. He noted that Section III covers reporting of injection well activity, conversion of injection wells to production wells, lease transfer procedures, mechanical integrity testing, and permit procedures and technical requirements for injection wells.

OCCA representatives suggested that the section be organized according to the chronological order in which an injection well is developed. In response to a question, EPA and Minerals Council representatives explained that approximately 90% of injection wells are converted from production wells (and are not purpose-drilled as injection wells). In response to a question from a Minerals Council member, an EPA representative explained that the agency does not conduct testing of drinking water unless specific concerns are reported.

#### *Section: IV. Spill Prevention Control and Countermeasures*

An EPA representative explained that the Spill Prevention Control and Countermeasures (SPCC) guidelines have been in place since the 1970s. The regulations require all operators to have an SPCC Plan on site; the plans are created by certified engineers and are designed to reduce the likelihood of spills occurring and, in the event that a spill does occur, provide a plan to clean it up.

In response to questions from OCCA representatives, an EPA representative explained that operators are not required to submit SPCC plans to SPCC unless an operator has discharged more than 1,000 U.S. gallons (approximately 24 barrels) of oil into navigable waters in a single spill event; or discharged more than 42 U.S. gallons (one barrel) of oil into navigable waters in two reportable spill events within any 12-month period. In addition, EPA does conduct spot inspections of producers to confirm that they have up-to-date SPCC plans on file. In response to requests from OCCA representatives that EPA require that all operators in Osage County submit their SPCC plans to EPA, EPA representatives responded that they neither have the legal authority to require this nor do they have the capacity to inspect SPCC plans from all operators across oil and gas country, partly as the plans are regularly updated by operators and mostly because there are so many. OCCA representatives also suggested that the Manual specify how often producers inspect their flowlines and how promptly they clean up oil discharges. EPA representatives responded that inspection frequency is specified in SPCC plans and are tailored to each operator's facilities and operations. OCCA representatives also inquired whether producers could be required to provide the surface owner(s) on which their operation is located with a copy of their SPCC plans. A BIA representative responded that neither BIA nor EPA have the legal authority to compel operators to do so but could ask about this in the next discussion with the producers.

#### *Section: V. Clean Air Act*

An EPA representative explained that this section is new to the 2014 draft of the Osage Operators Manual and was not included in the 1997 Manual. The section on air pollution functions somewhat differently from the other sections of the Manual since there are very few regulatory requirements placed on oil and gas facilities with regards to controlling pollution. Instead, a general duty clause to operate in an environmentally friendly manner applies to oil and gas production facilities and the EPA has laid out a host of best management practices to help flesh out the general duty clause. If it seems that an operator is generally failing to comply with these best management practices, EPA can take enforcement action, but the agency will not enforce each of these air quality provisions individually. The EPA representative also explained that hydrogen sulfide (H<sub>2</sub>S) is not designated as a hazardous air pollutant under

federal law, thereby precluding EPA from regulating it directly, but that the draft Manual includes a number of best management practices for operators. Finally, the draft Manual does contain references to a few specific regulations where applicable regulations exist, such as in sub-section “D” (on page 47 of the draft Manual), and these regulatory provisions allow EPA to regulate these areas specifically.

In response to questions from an OCCA representative and an Oklahoma Department of Environmental Quality representation about regulatory jurisdiction over air quality, EPA and BIA representatives stated that operators should contact the BIA hotline and that the BIA would coordinate a response among the appropriate agencies. In case hydrogen sulfide is suspected, BIA will contact EPA. In addition, all BIA Osage Agency field staff also have hydrogen sulfide monitors and will accompany EPA staff on the site inspection. The agencies also agreed to work together to clarify roles and responsibilities between them, both for handling air quality issues and also other issues that are likely to arise.

OCCA, BIA, EPA, and Osage Minerals Council representatives also discussed whether the US National Institute for Occupational Safety and Health (NIOSH) has designated the Immediately Dangerous to Life or Health (IDLH) level for hydrogen sulfide at 300 ppm or at 100 ppm and what the implications of such a designation are. EPA representatives agreed to look into this issue. An OCCA representative added that even a 100 ppm level is actually fatal, and so the guidance in the Operators Manual should actually be at the 5 ppm or 10 ppm threshold. An EPA representative noted that the human nose can sense the presence of hydrogen sulfide at very low levels, of less than 0.1 ppm, and that hydrogen sulfide is not found at all drilling sites, only those that penetrate strata with high sulfur content. EPA is very willing to follow up on and inspect hydrogen sulfide complaints.

An OCCA representative inquired as to whether EPA and BIA should assume that Onshore Order 6, which pertains to hydrogen sulfide, will be incorporated into the updated regulations (currently under review by the Department of the Interior) and, if so, whether the draft Operators Manual should include a reference to Onshore Order 6. The OCCA representative also suggested that, if the agencies do not assume that Onshore Order 6 will be included in the updated regulations, whether BIA and EPA can commit to updating the Manual when the regulations are promulgated. Representatives from EPA and BIA responded that any reference to the updated regulations is premature at present but could be updated once applicable regulations are promulgated.

An OCCA representative also requested that EPA and BIA try to clarify the meaning of “populated areas” in §V.F.3 pertaining to the provision of warning devices for hydrogen sulfide.

when production facilities are located in populated areas. EPA and BIA representatives agreed to look into this further.

*Section: VI. Resource Conservation and Recovery Act*

An EPA representative explained that oil and gas exploration and production operations are mostly exempt from the Resource Conservation and Recovery Act (RCRA) and that the language in the draft Manual largely details those exemptions. The language has been slightly updated from the 1997 Manual.

An OCCA representative noted that most areas that are of landowner concern are exempt from RCRA oversight and sought to clarify whether oil field debris and other objects left behind from production operations are exempt or non-exempt from RCRA oversight. An EPA representative responded that fluids are generally non-exempt from RCRA oversight but that empty containers and debris would generally be exempt. The EPA representative agreed to clarify and confirm the exemption status of different types of items with EPA's RCRA department.

An Osage Minerals Council (OMC) representative added that, while the discussion has been focused on the content of the Manual and the text of the regulations, the BIA-Osage Agency is already taking action in a wide variety of areas. The Agency's staff, training, and capacity are growing quickly and the Agency serves as a single point of contact to deal with all kinds of operational issues. The OMC representative suggested that many, if not all, of the operational requirements that the OCCA wants included in the Manual are already included in the jurisdiction of what the Agency is responsible for enforcing and are contained in the BIA's best business practices. In response, an OCCA representative inquired whether the OCCA could receive a written copy of those best management practices and other Osage Agency procedures. OMC and BIA representatives said that, while those policies and practices are not currently written down, the Agency could explore the possibility of extracting relevant text from the Agency's internal documents for a publication.

*Section: VII. Naturally Occurring Radioactive Material*

An EPA representative briefly explained that this section contains recommended practices for protecting employee-health from possible exposure to naturally occurring radioactive material.

An Oklahoma Department of Environmental Quality representative suggested that NORM should be more-accurately referred to as technically enhanced naturally occurring radioactive material (TENORM).

### *Section: VIII. Migratory Birds*

An EPA representative explained that this section of the draft Manual provides information about the coverage of the Federal Migratory Bird Treaty Act and suggestions about practices that operators can employ to comply with the Act.

An OCCA representative suggested that the section be expanded to encompass the Endangered Species Act and any other applicable state and federal law.

### **Additional Process Steps**

An OCCA representative indicated that the organization would like to submit comments in writing. The Consensus Building Institute agreed to receive these comments and route them to EPA and BIA.

### **Public Comment**

Other producers and members of the public were allowed time to comment. The following are comments made.

- Ms. Nona Roach asked whether there are supposed to be footnotes located in the draft Operators Manual and, if so, where these can be found. *In response, an EPA representative said that the draft Manual does have footnotes but that a technical problem precluded them from being printed in the hard copy documents. The EPA representative said that he or she would look into fixing this.*
- Ms. Nona Roach suggested that a phone number for the Oklahoma Department of Environmental Quality be included in the Operators Manual, particularly for situations that are potentially fatal, such as hydrogen sulfide exposure, since routing calls through the BIA hotline could take too long.
- Ms. Nona Roach suggested that the agencies reexamine §IV.4.a to clarify whether dike drains are permitted in Osage County. *BIA representatives agreed to look into this.*
- Mr. Gene Bowline, landowner: I have a flare within 200 feet of my barn. It says here that H<sub>2</sub>S is not classified as a hazardous air pollutant. I would graciously invite all of you to come to my house and have a little sniff.

### **Closing Comments**

- Jeff Henry, President of the Osage County Cattlemen's Association (OCCA), thanked BIA and EPA for including the OCCA in the Manual revision process. He said that he thinks that the parties are on the same page in terms of the scope of the process and that hopefully the OCCA can come into the next meeting organized to provide specific comments on the text of the Manual.

- Eddie Streater, Deputy Regional Director, BIA Eastern Oklahoma Regional Office, and Christina Kracher, Tribal Consultation Advisor, EPA Region 6, both said that the parties made a lot of progress in gaining understanding of what the scope of the process is and the agencies now better understand the surface owners' concerns. They thanked the OCCA for coming to the table.

### **Adjournment**

The meeting was adjourned at 12:35 pm.

## **Action Items**

### *EPA:*

- Look into whether the US National Institute for Occupational Safety and Health (NIOSH) has designated the Immediately Dangerous to Life or Health (IDLH) level for hydrogen sulfide at 300 ppm or at 100 ppm.
- Clarify the meaning of “populated areas” in §V.F.3 pertaining to the provision of warning devices for hydrogen sulfide when production facilities are IOCCAted in populated areas.
- Include footnotes in printed versions of draft Operators Manual.
- Clarify and confirm the exemption status of different types of items with EPA’s RCRA department.

### *BIA:*

- Reexamine §IV.4.a to clarify whether dike drains are permitted in Osage County.

### *All government agencies:*

- Clarify roles and responsibilities between agencies around various issues that are likely to arise.
- Revise the Manual per comments received in this first round of meetings

### *OCCA:*

- Submit written comments to the Consensus Building Institute for routing to EPA and BIA.

### *Consensus Building Institute:*

- Create a meeting summary for review by EPA, BIA, OMC, and OCCA and for finalization under CBI’s auspices.

## Attachment A: Attendance

### FEDERAL AGENCY OFFICIALS AND OTHER STAFF

Last Name	First Name	Organization
Ray-Hodge	Vanessa	Department of Interior, Office of the Solicitor
Daniels	Ben	Bureau of Indian Affairs
Hale	Jeannine	Bureau of Indian Affairs
Loftin	Rhonda	Bureau of Indian Affairs
Streater	Eddie	Bureau of Indian Affairs
Aguinaga	David	Environmental Protection Agency, Region 6
Kracher	Christina	Environmental Protection Agency, Region 6
Lane	Willie	Environmental Protection Agency, Region 6
Ruhl	Chris	Environmental Protection Agency, Region 6
Sanborn	Kent	Environmental Protection Agency, Region 6
Field	Patrick	Consensus Building Institute
Kansal	Tushar	Consensus Building Institute

### OSAGE MINERALS COUNCIL MEMBERS

Last Name	First Name	Organization
Abbott	Sonny	Osage Minerals Council
Bear	Curtis	Osage Minerals Council
Boone	Cynthia	Osage Minerals Council
Core	Melvin	Osage Minerals Council
Crum	Galen	Osage Minerals Council
Red Eagle	Myron	Osage Minerals Council
Whitehorn	Dudley	Osage Minerals Council
Yates	Andrew	Osage Minerals Council

### OSAGE COUNTY CATTLEMEN'S ASSOCIATION REPRESENTATIVES

Last Name	First Name	Organization
Hamilton	Bob	Osage County Cattlemen's Association
Henry	Jeff	Osage County Cattlemen's Association
Hurd Jr.	John	Osage County Cattlemen's Association

**MEMBERS OF THE PUBLIC**

<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>
Allen	Matt	Osage Nation Environmental and Natural Resources (ENR) Department
Austin	Rick	Oklahoma Department of Environmental Quality
Bowline	Gene	Land Shareholder/Owner
Gillman	Kristen	Oklahoma Department of Wildlife Conservation
Jackman	Bob	Producer
Jones	Jann	Osage Nation Environmental and Natural Resources (ENR) Department
Kirk	Lloyd	Oklahoma Department of Environmental Quality
Roach	Nona	Landowner
Walker	Craig	Osage Nation Environmental and Natural Resources (ENR) Department