



United States Department of the Interior

National Park Service
Theodore Roosevelt National Park
Post Office Box 7
Medora, North Dakota 58645



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APR 23 2021

**MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS**

April 20, 2021

Montana Board of Oil and Gas Conservation
2535 St. John's Avenue
Billings, MT 59102

Dear Montana Board of Oil and Gas Conservation:

We appreciate the opportunity to engage the state of Montana Board of Oil and Gas Conservation concerning two applications for permit to drill (APD) submitted by Prima Exploration, Inc. Pursuant to rule 36.22.601 of the Administrative Rules of Montana, the National Park Service (NPS) is requesting the opportunity for a public hearing in regards to both applications for a permit to drill submitted by Prima Exploration, Inc.; surface locations specified as within Section 13, T26N, R59E, M.P.M., Roosevelt County, Montana (2080' FNL, 22' FWL & 2106' FNL, 66' FWL).

It is our understanding that the proposed surface location is on private land near the official Fort Union Trading Post National Historic Site boundary. Additionally, the proposed well location is within the historically significant viewshed of the National Park Service site.

Fort Union Trading Post National Historic Site is a National Historic Landmark and is on the National Register of Historic Places. Additionally, the site is one of many NPS sites that comprise the Lewis and Clark National Historic Trail. The site tells the story of the most preeminent fur trading post on the Upper Missouri River and it remains a symbol of peaceful interaction between native tribes and European colonists. The cultural landscape, including the viewshed, is a fundamental resource of the park. The fort, situated on a high bluff overlooking the confluence of the Yellowstone and Missouri Rivers, is the largest tourism attraction in northwestern North Dakota. One of the most compelling aspects of the fort's history is the fact that several artists including George Catlin, Karl Bodmer, and John James Audubon stayed at the fort and painted the landscape, the river confluence, tribal peoples, and traditional life scenes on the Northern Great Plains. The artists recorded a vast historic viewshed that remains preserved at the fort today. Surface developments and activities can have visual impacts on the park, impact dark night skies, and diminish visitor experience of the historic landscape. Light and flaring can impact dark night skies. Noise can also be an issue as it disrupts the natural quiet that visitors expect to find during their visit to the park.

The NPS does not have regulatory authority concerning adjacent energy development, however, we have a proven track record of working with energy companies to preserve the historic elements, nationally significant landscapes, and natural resources of the nation's most visited sites. The NPS conducted a site visit with Prima Exploration, Inc. representatives on March 23, 2021 where NPS managers expressed concern over the proposed location of the well pad and its proximity to Fort Union Trading Post National Historic Site and its historically significant viewshed.

Two viewshed maps are attached to this letter to inform your understanding of potential visual impacts on the historic site. Based on the proposed surface locations, these proposed developments have the potential

to impact 285-acres of Fort Union Trading Post National Historic Site. As an alternative to the proposed surface location, we propose Prima Exploration, Inc. develop the spacing unit as defined as Sections 1, 12, and 13, T26N, R59E, M.P.M., Roosevelt County, Montana from the north to the south which will minimize proximity and visual impacts to Fort Union Trading Post National Historic Site.

You may contact me at wendy_ross@nps.gov or at 701-623-4466. I am the North Dakota NPS Superintendent and I manage all of the state's NPS sites. Alice Hart is the Superintendent of Fort Union Trading Post National Historic Site and I will be including her in all correspondence concerning this proposal. Thank you for your attention to our concerns to a nationally significant NPS site.

Sincerely,



Wendy Ross
Superintendent

One Attachment

CC:

Prima Exploration, Inc.
250 Fillmore Street
Suite 500
Denver, CO 80206

Pete Brown
Montana State Historic Preservation Officer
PO Box 201202
Helena, MT 59620
pebrown@mt.gov

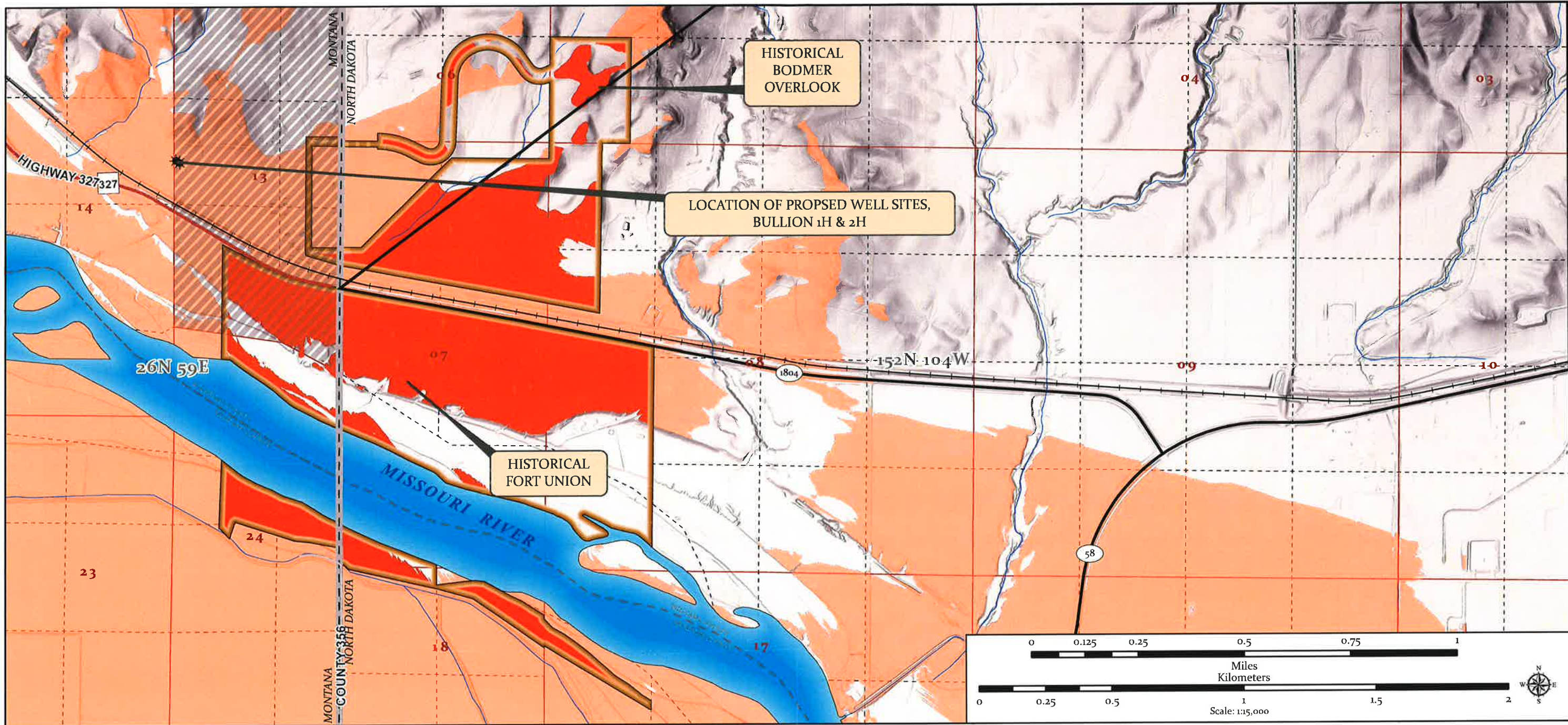
Dr. Bill Peterson
North Dakota State Historic Preservation Officer
612 East Boulevard Avenue
Bismarck, ND 58505
billpeterson@nd.gov

Alice Hart
Superintendent
Fort Union Trading Post National Historic Site
15550 Highway 1804
Williston, ND 58801
alice_hart@nps.gov

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Prima Exploration, Inc. - Proposed Energy Development Production Phase Viewshed (Bullion 1H & 2H)

LEGEND

Viewshed Result

- Overall Viewshed of Proposed Well Sites
- Areas of Potential Visual Impacts within Fort Union Trading Post NHS (285-acres)

- Administrative Boundary Fort Union Trading Post National Historic Site
- Spacing Unit
- Road
- Railroad

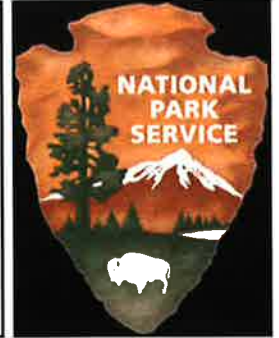
Analysis Description

Visual impacts of two proposed energy developments located within the SW₁/₄ NW₁/₄ of Section 13, T.26N., R.59E. Montana Principal Meridian were evaluated for the Fort Union Trading Post National Historic Site, Montana/North Dakota. Model inputs include a bare earth 1-m digital elevation model (DEM), viewshed parameters of 6-ft observer height and 35-ft structure height, and a distance degradation algorithm. The result of this analysis is portrayed in the map document as color shaded areas, which denote the likelihood of being able to visually identify a typical oil/gas surface development near the Fort Union Trading Post National Historic Site.

Overall, Fort Union Trading Post National Historic Site will potentially have 285-acres visually impacted by the proposed energy development.

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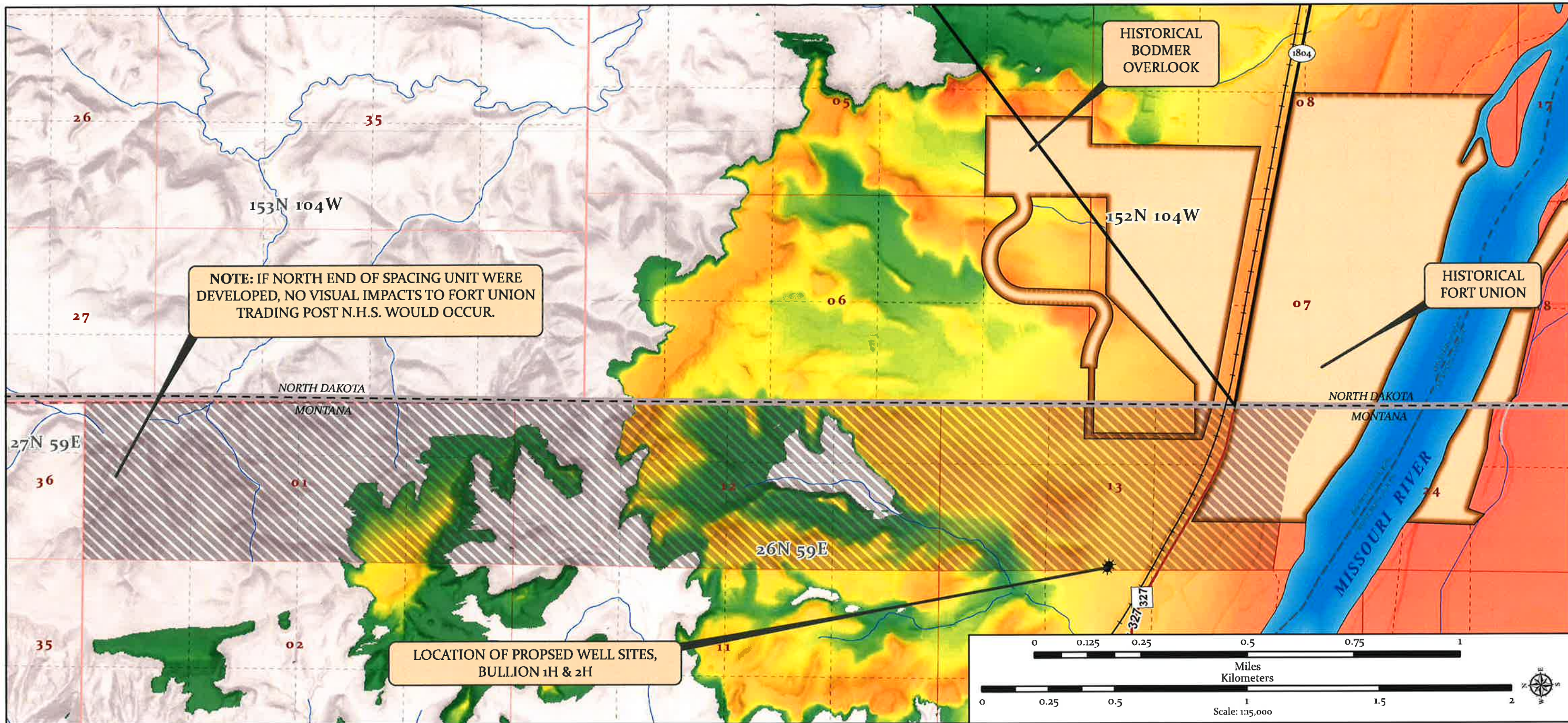
C. L. Sexton
GIS Analyst
Theodore Roosevelt NP

Map Disclaimer: No warranty is made by the National Park Service as to the accuracy, reliability, or completeness of these datasets for individual or aggregate use with other data. Original data was compiled from various sources and may be updated without notification.

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Map Production Date: Tuesday, April 20, 2021

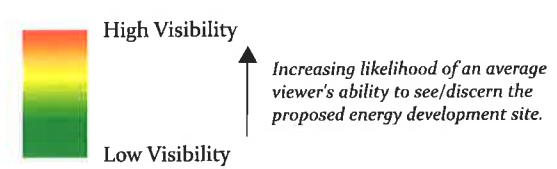
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Prima Exploration, Inc. - Proposed Energy Development Production Phase FOUS Overall Viewshed

LEGEND

Viewshed Result



- Administrative Boundary
- Fort Union Trading Post National Historic Site
- Spacing Unit
- Road
- Railroad

Analysis Description

Visual impacts of two proposed energy developments located within the SW₁/₄ NW₁/₄ of Section 13, T.26N., R.59E. Montana Principal Meridian were evaluated for the Fort Union Trading Post National Historic Site, Montana/North Dakota. Model inputs include a bare earth 1-m digital elevation model (DEM), viewshed parameters of 6-ft observer height and 35-ft structure height, and a distance degradation algorithm. The result of this analysis is portrayed in the map document as color shaded areas, which denote the likelihood of being able to visually identify a typical oil/gas surface development near the Fort Union Trading Post National Historic Site.

For example, if a 35-ft tall structure was developed in an "orange" shaded area there would be a high likelihood the development could visually impact multiple observer points within Fort Union Trading Post National Historic Site. In contrast, if a similar structure was developed in a "white" shaded area there would be no visual impact to Fort Union Trading Post National Historic Site.

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C. L. Sexton
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