

Exhibit 1

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

TGS; WesternGeco, LLC; CGG Services)	
(U.S.), Inc.; Spectrum Geo, Inc.; MultiKlient)	IBLA No.: 2017-135 (consolidated)
Invest AS; and International Association of)	IBLA No.: 2017-140
Geophysical Contractors,)	
)	
Appellants (Nos. 2017-135 to -139))	Offshore Oil & Gas Exploration Permit
)	Denials
)	
Ion/GX Technology Corp.,)	
)	
Appellant (No. 2017-140),)	
)	
v.)	
)	
Bureau of Ocean Energy Management,)	
)	
Respondent,)	
)	
and)	
)	
Surfrider Foundation,)	
)	
Proposed Intervenor-Respondent.)	

DECLARATION OF PETER STAUFFER

I, Peter Stauffer, do hereby declare:

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

2. I am a long-standing active member of Surfrider Foundation (“Surfrider”), which is a Proposed Intervenor-Respondent in this case. I am also a staff member and the Environmental Director for Surfrider. Surfrider Foundation is a non-profit organization whose mission includes the protection and enjoyment of oceans, waves and beaches through

a powerful network. Surfrider Foundation now maintains over 500,000 supporters, activists and members, with more than 80 volunteer-led chapters and 60 clubs in the United States, and more than 400 victories protecting our coasts. I submit this declaration in support of intervention.

3. I am currently a resident of Southern California, and I have been a staff member of Surfrider for the past 11 years, since 2006. I have also been a member of Surfrider for the past 14 years, since 2003.

4. I have enjoyed recreational activities on the Atlantic Coast for decades, visiting approximately three times every year. I travel to the East Coast for both professional and personal reasons, including family visits to relatives who reside on the East Coast. I regularly enjoy surfing and beach going in places like Florida and Virginia. The recreational enjoyment I derive from these activities is directly linked to a healthy and vibrant marine ecosystem whether it is passive observations as a beachgoer and waterman or active through surfing in the perfect waves created by the natural marine environment. As the Environmental Director of Surfrider Foundation, I am very cognizant of the numerous threats facing our ocean, including those posed by oil and gas exploration and development. I plan to continue both my enjoyment of coastal recreational resources and my activities to protect such resources for the foreseeable future.

5. I believe that whales and other marine life are a very important part of our natural resources and that they should be protected from needless harmful activity.

6. I have been informed and am aware of the environmental harms that would be caused by seismic testing in the Atlantic. I have concerns that the activity is known for harming and disorienting marine mammals and other marine life. I am also aware that the

noise from this activity can lead to permanent physical injury and even to the beaching of whales and dolphins whose ability to generate, hear, and process sounds has been impaired. This impairment could affect their ability to look for food, interact in groups, protect themselves from predators or other threats, and may result in driving these animals from productive habitats and interfering with essential behaviors, like communication and hunting. I am concerned that these impacts will make it more difficult for me and other Surfrider members to enjoy these animals and other ocean resources, including the aesthetic enjoyment of watching healthy dolphins, turtles, and other marine life thrive in their natural environment.

7. I am also concerned about the potential impacts of seismic oil and gas exploration to the coastal economy, which is dependent upon the health of the ocean and marine wildlife. Businesses that rely upon a healthy and inviting ocean and coastal experience may be adversely affected through the proposed seismic testing activity and its impacts on the marine mammals and other ocean wildlife that these businesses rely upon.

8. Surfrider has a long-standing interest in the conservation of the Atlantic Ocean, its wildlife and habitat. Surfrider maintains 27 grassroots chapters on the East Coast of the United States, run by volunteer members who are committed to upholding Surfrider's mission, including the priority initiative of ocean protection. Surfrider members seek to protect and enjoy marine wildlife, coastal recreation, coastal aesthetics, and other ocean resources.

9. The permits that are at issue in this appeal are relevant to Surfrider's work to protect ocean resources, including marine species and habitat. Since 2015, Surfrider Foundation's chapter network has worked with partners to help pass over 120 local

government resolutions against offshore drilling and seismic exploration in the Atlantic Ocean. In February 2016, Surfrider and a delegation of coastal recreation industry leaders met with White House staff and Abigail Hopper, Director of the Bureau of Ocean Energy Management, to deliver over 1,000 signatures from coastal businesses in opposition to offshore drilling in the Atlantic.

10. My and other Surfrider's members' recreational, aesthetic, and conservation interests in the Atlantic Coast, as described above, are directly affected and harmed by proposed seismic testing. The seismic testing activities, if allowed to proceed, would adversely affect my interests, as well as those of Surfrider, and its staff, members and supporters.

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

Executed this 5th day of May, 2017 in Portland, Oregon.

A handwritten signature in black ink that reads "Pete Stauffer". The signature is written in a cursive style with a horizontal line underneath the name.

Pete Stauffer