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Management of Non-Federal Oil & Gas Rights, 50 CFR 29, Subpart D, OMB Cont. No., 1018-0162

Comment On: FWS-HQ-NWRS-2026-0562-0001

Agency Information Collection Activities; Non-Federal Oil and Gas Operations on National Wildlife Refuge System Lands

Document: FWS-HQ-NWRS-2026-0562-0003

Comment from Murrey, Ashton

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General Comment

See attached file(s)

Attachments

MurreyPublicComment

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4/20/2026

Re: Agency Information Collection Activities; Non-Federal Oil and Gas Operations on National Wildlife Refuge System Lands [Docket No. FWS-HQ-NWRS-2026-0562; OMB Control Number 1018-0162; FXRS12610900000-267-FF09R24000]

Record keeping and the correct filing of information is one of the most crucial aspects of keeping an organization running smoothly. An effective information collecting and filing system is even more necessary in governmental agencies, considering the amount of paperwork that is filed each day and the need to be able to recall any said piece of information and paperwork whenever a situation calls for it. I am compelled to respond to this notice and request for comment because I have worked in many positions with varying methods of record keeping, from writing down and passing information on physical pieces of paper to electronically recording and filing records on designated sheets. Most notably and relevant to the topic at hand, I have worked a position at a Wildlife Refuge in which I have recorded information on gas operations and so I feel as if my input could be beneficial.

Anecdotally, I will give a summary of my experiences working with different forms of information collecting I have gained from working at different positions. Firstly, I used to work at a restaurant in which all of the necessary information including customer names and phone numbers (for over the phone orders), customer orders, customer allergens, etc., were all written on small notecards. These notecards were then handed to the chefs, placed into baskets, or discarded based on the information written on them. Despite the benefits of having information that you could record on-hand relatively fast, this system typically resulted in confusion on a day-to-day basis due to mistakes and errors in the passing of information, with the note cards being handed to the wrong person, ending up in the wrong basket, being accidentally discarded, etc. In my most recent position, I worked as a Camp Counselor in a Conservation Education Summer Camp under USFWS. In this position it was required to submit your worked hours electronically. I would record however many hours I worked on a daily basis and at the end of the week I would go to the given website, type in the appropriate code numbers for my position and type of work I

accomplished (regular hours, holiday, overtime) and fill in my hours in the appropriate subject boxes. Despite the guarantee of information being properly recorded and sorted electronically there were some added challenges such as a relatively confusing electronic format, meticulously being aware that you're putting the correct information in the correct places and needing access to an electronic device and stable internet (increasingly difficult given the outdoor nature of many positions within the USFWS). Finally, in my position working at a Wildlife Refuge, in regard to recording information related to gas operations, all of the employees used a written paper system. I was a part of the Youth Conservation Corps at the time and so the process of taking and transferring all of the collected information was left to the higher-ups. However, whenever our vehicle needed gas, we would write down the code number of the vehicle, the initials of the individual recording the information, how much gas was used, the date, and other relevant information on a sheet attached to a clipboard in the neighboring storage facility beside the gas tank. This system seemed to be efficient although I cannot attest to the ease or discomfort of this process past the actions of recording the information as I mentioned prior that it was not within my responsibilities to pass along the recorded information.

It is stated within the notice that public comments addressing four different factors would be especially noticed:

1. Whether or not the collection of information is necessary for the proper performance of the functions of the agency, including whether or not the information will have practical utility;
2. The accuracy of our estimate of the burden for this collection of information, including the validity of the methodology and assumptions used;
3. Ways to enhance the quality, utility, and clarity of the information to be collected; and
4. How might the agency minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of response.

In attempt to respond to these factors, and to reiterate; record keeping is an integral part of every facet of a governmental agency, it allows for data to be properly managed and stored to be utilized when need be, it helps ensure compliance with laws and regulations, and the information stored can act as a framework for future operations and management

decisions. The implementation of nationwide practices and protocols of collecting information data while being flexible to allow individual wildlife refuges to apply site-specific protocols to meet unique logistics and needs would be the most beneficial in this scenario to prevent any confusion and ensure consistent data results (Falcucci, 2006). In regard to the comparative efficiency in the information collection of physical paperwork or electronic submissions, I would like to highlight that electronic forms of data collection are already being proved effective for implementation in other facets of wildlife refuge operations such as keeping track of visitor count (Winder et al., 2025). However, there is already a set standard of physical paper-based information collection and so older generations or less tech literate individuals may have a hard time adjusting to electronic based systems (Adeyinka, 2015). Therefore, I propose the implementation of a hybrid-based information collection system as it would be the most efficient option available (Hamilton et al., 2003). Data collection and the filling out of documents can be hand-made on physical sheets on wildlife refuges, where it was discussed how specific limiting factors such as an outdoor terrain and potential lack of internet service can limit electronic access, and then at a later point the data could be transferred to an electronic data base for a more efficient filing system and storage. Finally, to monitor the success of any implemented decisions, I propose the adoption of an adaptive management style. Similar to how projects and practices are conducted in the conservation sciences, an adaptive management style in which there is an implementation of a monitoring system that compares the accuracy and efficiency of separate models of record keeping (electronic, paper, or hybrid) can help inform future management decisions (Moore et al., 2011).

Thank you for your time and your consideration of these comments.

Literature Cited:

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