

Supporting Statement for Paperwork Reduction Act Submissions
30 CFR 250, Subpart A, General
Forms MMS-132, MMS-1123, and MMS-1832
OMB Control Number 1010-0114
Current Expiration Date: October 31, 2007

Terms of Clearance: None

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i) (iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When statistical methods are employed, Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Outer Continental Shelf (OCS) Lands Act, as amended (43 U.S.C. 1331 et seq. and 43 U.S.C. 1801 et seq.), authorizes the Secretary of the Interior to prescribe rules and regulations to administer leasing of the OCS. Such rules and regulations will apply to all operations conducted under a lease. Operations on the OCS must preserve, protect, and develop oil and natural gas resources in a manner that is consistent with the need to make such resources available to meet the Nation's energy needs as rapidly as possible; to balance orderly energy resource development with protection of human, marine, and coastal environments; to ensure the public a fair and equitable return on the resources of the OCS; and to preserve and maintain free enterprise competition. Section 1332(6) states that "operations in the [O]uter Continental Shelf should be conducted in a safe manner by well trained personnel using technology, precautions, and other techniques sufficient to prevent or minimize the likelihood of blowouts, loss of well control, fires, spillages, physical obstructions to other users of the waters or subsoil and seabed, or other occurrences which may cause damage to the environment or to property or endanger life or health."

The Independent Offices Appropriations Act (31 U.S.C. 9701), the Omnibus Appropriations Bill (P. L. 104-133, 110 Stat. 1321, April 26, 1996), and Office of Management and Budget (OMB) Circular A-25, authorize Federal agencies to recover the full cost of services that confer special benefits. Under the Department of the Interior's (DOI) implementing policy, the Minerals Management Service (MMS) is required to charge fees for services that provide special benefits or privileges to an identifiable non-Federal recipient above and beyond those which accrue to the public at large.

This information collection (IC) request covers 30 CFR 250, Subpart A, General. This request also covers the related Notices to Lessees and Operators (NTLs) that MMS issues to clarify and provide additional guidance on some aspects of our regulations.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. [Be specific. If this collection is a form or a questionnaire, every question needs to be justified.]

The MMS uses the information collected under the Subpart A regulations to ensure that operations on the OCS are carried out in a safe and pollution-free manner, do not interfere with the rights of other users on the OCS, and balance the protection and development of OCS resources. Specifically, we use the information collected to:

- Review records of formal crane operator training, rigger training, crane operator qualifications, crane inspections, testing, and maintenance to ensure that lessees perform operations in a safe and workmanlike manner and that equipment is maintained in a safe condition. The MMS also uses the information to make certain that all new and existing cranes installed on OCS fixed platforms must be equipped with anti-two block safety devices, and to assure that uniform methods are employed by lessees for load testing of cranes.
- Review welding, burning, and hot tapping plans, procedures, and records to ensure that these activities are conducted in a safe and workmanlike manner by trained and experienced personnel.
- Provide lessees greater flexibility to comply with regulatory requirements through approval of alternative equipment or procedures and departures to regulations if they demonstrate equal or better compliance with the appropriate performance standards.
- Determine the capability of a well to produce oil or gas in paying quantities or to determine the possible need for additional wells resulting in minimum royalty status on a lease. If a well does not yield hydrocarbons in sufficient quantity to warrant continued operation and production, MMS uses the information to verify the claim and to release the lessee from lease obligations. Conversely, the information is used to extend the term of the lease if additional wells will warrant continued operation and production.
- Ensure that injection of gas promotes conservation of natural resources, prevents waste, and that subsurface storage of natural gas does not unduly interfere with development and production operations under existing leases.
- Ensure the appropriateness of reimbursing lessees for costs incurred in reproducing geological and geophysical (G&G) data and information for submission to MMS and processing or reprocessing G&G information in a form and manner other than that normally used in the conduct of a lessee's business, or to determine the proper reimbursement of costs incurred during inspections.
- Record the designation of an operator authorized to act on behalf of the lessee and to fulfill the lessee's obligations under the OCS Lands Act and implementing regulations, or to record the local agent empowered to receive notices and comply with regulatory orders issued (Form MMS-1123). This form requires the respondent to submit general information such as lease number, name, address, company number of designated operator, and signature of the authorized lessee.

- Determine if an application for right-of-use and easement serves the purpose specified in the grant when conducting exploration, development, and production activities or other operations on or off the lease; is maintained for such purposes; and does not unreasonably interfere with the operations of any other lessee.
- Provide for orderly development of leases through the use of information to determine the appropriateness of lessee requests for suspension of operations, including production. For example, MMS needs the information to determine that a suspension is necessary to: (1) ensure proper lease development, (2) allow time to construct or negotiate use of transportation facilities, (3) allow reasonable time to enter into a sales contract, (4) allow for unavoidable situations, (5) avoid continued operations resulting in premature abandonment of a producing well(s) that would be uneconomic, (6) comply with the National Environmental Policy Act or to conduct an environmental analysis, (7) install equipment for safety and environmental protection, (8) allow time for inordinate delays encountered in obtaining required permits or consents, (9) comply with judicial decrees, or (10) avoid activities that pose a threat of serious, irreparable, or immediate harm.
- Improve safety and environmental protection on the OCS through collection and analysis of accident reports to ascertain the cause of the accidents and to determine ways to prevent recurrences.
- Ascertain when the lease ceases production or when the last well ceases production in order to determine the 180th day after the date of completion of the last production. This requirement is expanded in the final rule to include reporting when lease production is initiated, resumes before the end of the 180-day period after production ceased, and when leaseholding operations occur during the referenced 180-day interval. The MMS will use this information to efficiently maintain the lessee/operator lease status.
- Approve requests to cancel leases.
- Be informed when there could be a major disruption in the availability and supply of natural gas and oil due to natural occurrences/hurricanes, to advise the U.S. Coast Guard (USCG) in case of the need to rescue offshore workers in distress, to monitor damage to offshore platforms and drilling rigs, and to advise the news media and interested public entities when production is shut in and when resumed. The OCS operations produce more than one-quarter of the Nation's natural gas and more than one-sixth of its oil, and it is essential to know when production is interrupted. The Gulf of Mexico Region (GOMR) uses a reporting form for respondents to report evacuation statistics when necessary (Form MMS-132, Evacuation Statistics, copy attached). It is sent to respondents at the onset of each "hurricane season" in the GOMR. This form requires the respondent to submit general information such as company name, contact, date, time, telephone number, as well as number of platforms and drilling rigs evacuated and not evacuated. We also require production shut-in statistics for oil (BOPD) and gas (MMSCFD).
- Allow operators who exhibit unacceptable performance an incremental approach to improving their overall performance prior to a final decision to disqualify an operator or to pursue debarment proceedings through the execution of a performance improvement plan (PIP). The Subpart A regulations do not address the actual process that we will follow in pursuing the disqualification of operators under §§ 250.135 and 250.136. However, our internal enforcement procedures include allowing such operators to demonstrate a commitment to acceptable performance by the submission of a PIP.

- Determine that respondents have corrected all Incidents of Non-Compliance (INC)(s) identified during inspections (Form MMS-1832). The MMS issues this form to the operator and the operator then corrects the INC(s), signs and returns the form to the MMS Regional Supervisor no later than 14 days.
- Review records of crane inspection, testing, maintenance, and crane operator qualifications to ensure that lessees perform operations in a safe and workmanlike manner and maintain equipment in a safe condition.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden [and specifically how this collection meets GPEA requirements].

The MMS encourages respondents to use the forms available on the website and submit them electronically. At present, an estimated 50 percent of submittals are being done electronically. This percentage should increase significantly over the next year with the implementation of the e-well project. The MMS Offshore Minerals Management (OMM) program is moving to fully implement the Government Paperwork Elimination Act with re-engineered business processes. Re-engineering the OMM full complement of business processes and related information collection burdens will take place incrementally beginning with the pre-implementation effort in FY 2002 and continuing through FY 2009. The first component was the Public Commenting System implemented in July 2004.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The DOI has several Memoranda of Understanding (MOU) with the USCG that define the responsibilities of each agency with respect to activities in the OCS. These MOU are effective in avoiding duplication of regulations and reporting requirements. The information collected in Subpart A is specific to a lease, an operator, or a particular request for MMS approval and is unique to the site and well operation. Except for accident/incident reporting, we are unaware of any duplication or similar information collected by other Federal agencies.

With respect to accident/incident reporting, MMS believes that it is imperative to upgrade our investigation analysis functions to ensure the continued safety of OCS operations. The USCG currently collects information on incidents onshore and offshore. However, the USCG reports generally are not conducive to in-depth analysis for OCS drilling and production facilities and do not contain the detail necessary to adequately describe accidents/incidents occurring at these facilities.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This collection of information does not have a significant economic effect on a substantial number of small entities. Any direct effects primarily impact the OCS lessees and operators. In general, companies need large technical and financial resources and experience to conduct offshore activities safely. However, 70 percent of the OCS lessees and operators may have less than 500 employees and would be considered small businesses as defined by the Small Business Administration. The hour burden on any small entity subject to these regulations cannot be reduced to accommodate them.

It is likely that a State lessee applying for a right-of-use and easement on the OCS may be a small business; however, the cost is minimal for applying for that benefit. It should be noted that the OCS Lands Act and these implementing regulations (§ 250.196) require us to reimburse respondents for their costs of reproduction and processing of data and information that MMS requests. We also pay respondents if they request reimbursement for food, quarters, or transportation they provide MMS representatives (§ 250.133) during inspections. These reimbursements eliminate a cost burden on both small and large businesses.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If we did not collect the information, MMS would be unable to effectively carry out the mandate of the OCS Lands Act and administer the offshore program with regard to granting suspensions of operations and production, determining well producibility, conserving resources through the injection and subsurface storage of gas, reimbursing certain costs, monitoring accident reports, reviewing crane records or allowing lessees greater flexibility in the manner in which they comply with the requirements of 30 CFR Part 250 through the adoption of performance standards. Information is collected only once for each particular event, except for the daily reporting during a natural disaster discussed in A.7 below. Therefore, less frequent collection of the information is not applicable.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

(a) requiring respondents to report information to the agency more often than quarterly.

In the event of a natural disaster (such as hurricanes or earthquakes) which would make it necessary to evacuate platforms or rigs or to shut in production, § 250.192 requires daily reporting (Form MMS-132, used in the GOMR) during the emergency situation. The reporting requirement would cease when the emergency ended. Quarterly reporting would be completely ineffectual for this situation.

(b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

Also with respect to (a), respondents are required to return copies of Form MMS-1832, Notification of Incidents of Noncompliance (INC), to MMS within 14 days from the date of issuance. The MMS issuing office cannot complete the records for an inspection until MMS receives an acknowledgment of the INCs. Historical records indicate that 14 days is a reasonable time for returning the green copy to the MMS issuing office and correcting most of the INCs cited. In addition, because INCs generally impact the safety of personnel, equipment, or the environment, they need to be corrected in an expeditious manner. Two weeks is a reasonable timeframe to return the rig or facility to compliance.

(c) requiring respondents to submit more than an original and two copies of any document.

Not applicable in this collection.

(d) requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than 3 years.

Section 250.108 clarifies that design and construction records are kept for the life of the crane, including installation records for any anti-two block safety devices. Respondents retain crane operator and rigger qualifications for 4 years at the OCS fixed platform. Retaining this information for the “life of the crane at the fixed offshore platform” is critical to determining its current safety, probable strength, and integrity, based on its history. As equipment ages, access to all aspects of its inspections, design,

maintenance, testing, etc., is necessary to determine whether standards for safety are maintained. The type of information collected is such that it is not unreasonable to expect that respondents would retain it as usual and customary business practice, even if not required in regulations. Crane operators must receive appropriate training every 4 years, and this record retention period allows the records to be available through appropriate refresher training. The requirement is also consistent with the American Petroleum Institute's Recommended Practice 2D, which is a document incorporated by reference in our regulations and specifies this timeframe. Section 250.109 requires respondents to retain information on welding, burning, and hot tapping plans for the life of the facility (platform or drilling rig). These are ongoing activities, and the approved plans must remain available for reference when needed to safely conduct these activities.

(e) in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study.

Not applicable in this collection.

(f) requiring the use of statistical data classification that has been reviewed and approved by OMB.

There are no special circumstances with respect to 5 CFR 1320.5(d)(2)(v) through (viii) as the collection is not a statistical survey and does not use statistical data classification.

(g) that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.

This collection does not include a pledge of confidentiality not supported by statute or regulation.

(h) requiring respondents to submit proprietary trade secrets or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

This collection does not require proprietary, trade secret, or other confidential information not protected by agency procedures.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice [and in response to the PRA statement associated with the collection over the past 3 years] and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. [Please list the names, titles, addresses, and phone numbers of persons contacted.] Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

As required in 5 CFR 1320.8(d), MMS provided a 60-day notice in the Federal Register on December 13, 2006 (71 FR 74937). Also, 30 CFR 250.199 and the Paperwork Reduction Act statement on forms MMS-132, MMS-1123, and MMS-1832 explain that the MMS will accept comments at any time on the information collected and the burden. We display the OMB control number and provide the address for sending comments to MMS. We received one comment in response to the Federal Register notice and it was not germane to the IC.

During the comment period, MMS requested input from several respondents on the burden of collecting this information. The burden estimates in Section A.12 reflect their input. The following respondents were contacted:

Newfield Exploration Company, Sunna Denny, Regulatory Analyst,
(281) 847-6143, 363 N. Sam Houston Parkway E, Suite 2020, Houston, TX 77060

Energy Resource Technology, Inc., Wendy Braddock, Regulatory Manager,
(281) 618-0400, 400 North Sam Houston Parkway East, Houston, TX 77060

Anadarko Petroleum Corporation, Offshore Operations, Gaylene Reier, Sr Regulatory Analyst,
(832) 636-3096, P O Box 1330, Houston, TX 77251-1330

El Paso Exploration and Production, Maria Gomez, Sr Regulatory Analyst,
(713) 420-5038, P O Box 2511, Houston, TX 77252-2571

Shell Offshore, Inc., Philip B. Smith, Permits and Issues Manager, Regulatory Affairs,
(504) 728-6161, P O Box 61933, New Orleans, LA 70161-1933

Arguello Inc., Tom Goeres, Operations Manager,
(805) 567-1604, 17100 Calle Mariposa Road, Goleta, CA 93117

Dos Cuadras Offshore Resources LLC, Robert L. Garcia, Vice President – Operations,
(805) 535-2200, 290 Maple Court, Suite #290, Ventura, CA 93003-3517

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

As explained in section A.5, the OCS Lands Act mandates that we reimburse respondents for their costs of reproduction and processing of certain data and information requested by MMS. The implementing regulations (§ 250.196) comply with the Act and provide for reimbursement payment of G&G information when applicable. We also pay respondents if they request reimbursement for food, quarters, or transportation they provide MMS representatives (§ 250.133) during inspections. We do not provide gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Requests for MMS approval may contain proprietary information related to performance standards or alternative approaches to conducting operations different from those approved and specified in MMS regulations. We will protect this proprietary information according to the Freedom of Information Act,

30 CFR Part 252, and 30 CFR 250.197, “Data and information to be made available to the public or for limited inspection.”

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The collection does not include sensitive or private questions.

12. Provide estimates of the hour burden of the collection of information. The statement should:

(a) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

(b) If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.

(c) Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.

There are approximately 130 Federal and 1 State oil and gas or sulphur lessees. We estimate an annual reporting and recordkeeping burden of 36,239 hours. Based on \$65 per hour, the burden hour cost to respondents is \$2,355,535. Refer to the chart below for a breakdown of the burden hours and fees.

HOUR AND FEE BURDEN BREAKDOWN

Citation 30 CFR 250 Subpart A and Related Forms/NTLs	Reporting or Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
		Fee		
Authority and Definition of Terms				
104; Form MMS-1832	Appeal orders or decisions; appeal INCs.	Exempt under 5 CFR 1320.4(a)(2), (c)		0
Performance Standards				
109(a); 110	Submit welding, burning, and hot tapping plans.	2	133 plans	266
115; 116	Request determination of well producibility; submit data & information; notify MMS of test.	5	90 responses	450
118; 119; 121; 124	Apply for injection or subsurface storage of gas.	10	14 applications	140
Subtotal			237 responses	856
Fees				
125	Service Fees	Fees covered individually throughout subpart.		0

Citation 30 CFR 250 Subpart A and Related Forms/NTLs	Reporting or Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours	Fee
Forms					
130-133; Form MMS-1832	Submit "green" response copy of Form MMS-1832 indicating date violations (INCs) corrected.	2	1,529 forms	3,058	
143; 144; 145; Form MMS-1123	Submit designation of operator (Form MMS-1123 – 15 mins. only); report change of address; notice of termination; submit designation of local agent.	1	1,470 forms	1,470	\$150 fee x 1,470 = \$220,500
192; Form MMS-132	Daily report of evacuation statistics for natural occurrence/hurricane (Form MMS-132 in the GOMR) when circumstances warrant; inform MMS when you resume production.	1	1,800 reports or forms	1,800	
Subtotal			4,799 responses	6,328	\$220,500
Inspection of Operations					
130-133	Request reconsideration from issuance of an INC.	2	178 requests	356	
	Request waiver of 14-day response time.	1	510 waivers	510	
	Notify MMS before returning to operations if shut-in.	.5	976 notices	488	
133	Request reimbursement for food, quarters, and transportation provided to MMS representatives (OCS Lands Act specifies reimbursement; no requests received in many years; minimal burden).	2	12 requests	24	
Subtotal			1,676 responses	1,378	
Disqualification					
135 MMS internal process	Submit PIP under MMS implementing procedures for enforcement actions.	40	4 plans	160	
Special Types of Approval					
140	Request various oral approvals not specifically covered elsewhere in regulatory requirements.	1	360 requests	360	
141	Request approval to use new or alternative procedures, including BAST not specifically covered elsewhere in regulatory requirements.	20	33 requests	660	
142	Request approval of departure from operating requirements not specifically covered elsewhere in regulatory requirements.	3	62 requests	186	
Subtotal			455 responses	1,206	
Naming and Identifying Facilities and Wells (Does Not Include MODUs)					
150; 151; 152; 154(a)	Name and identify facilities, artificial islands, MODUs, etc., with signs.	2	149 new/replace-ment signs	298	
150; 154(b)	Name and identify wells with signs.	1	1,016 new wells	1,016	
Subtotal			1,165 responses	1,314	
Right-of-use and Easement					
160; 161	OCS lessees: Apply for new or modified right-of-use and easement to construct and maintain off-lease platforms, artificial islands, and installations and other devices; including notifications.	10	60 applications	600	
160(c)	Establish a Company File for qualification; submit updated information, submit qualifications for lessee/bidder, request exception.	Burden covered under 1010-0006		0	
165	State lessees: Apply for new or modified right-of-use and easement to construct and maintain off-lease platforms, artificial islands, and installations and other devices.	5	2 application	10	
			\$2,350 state lease fee x 2 = \$4,700		
166	State lessees: Furnish surety bond.	Burden included with 30 CFR 256 (1010-0006).		0	
Subtotal			62 responses	610	\$4,700
Suspensions					
168; 170; 171; 172; 174; 175; 177;	Request suspension of operations or production; submit schedule of work leading to commencement.*	10*	325 requests*	3,250	
			\$1,800 fee x 325 = \$585,000		

Citation 30 CFR 250 Subpart A and Related Forms/NTLs	Reporting or Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
180(b), (d)	Submit progress reports on SOO or SOP as condition of approval.*	3*	1,070 reports*	3,210
177(a)	Conduct site-specific study; submit results. No instances requiring this study in several years--could be necessary if a situation occurred such as severe damage to a platform or structure caused by a hurricane or a vessel collision.	100	1 study/report	100
177(b), (c), (d); 182; 183, 185; 194	Various references to submitting new, revised, or modified exploration plan, development/production plan, or development operations coordination document, and related surveys/reports.	Burden included with 30 CFR 250, Subpart B (1010-0151).		0
Subtotal			1,396 responses	6,560
			\$585,000	
Primary Lease Requirements, Lease Term Extensions, and Lease Cancellations				
180(a), (f), (g), (h), (i), (j)	Notify and submit report on various leaseholding operations and lease production activities.	2	1,400 reports or notices	2,800
180(a), (b), (c)	When requested, submit production data to demonstrate production in paying quantities to maintain lease beyond primary term.	6	70 submissions	420
180(e)	Request more than 180 days to resume operations.	5	5 requests	25
181(d); 182(b), 183(b)(2)	Request termination of suspension and cancellation of lease (no requests in recent years for termination/cancellation of a lease; minimal burden).	20	2 requests	40
184	Request compensation for lease cancellation mandated by the OCS Lands Act (no qualified lease cancellations in many years; minimal burden compared to benefit).	50	1 request	50
Subtotal			1,478 responses	3,335
Information and Reporting Requirements				
186; 187; 188(a); 189; 190(c)	Report to the District Manager immediately via oral communication and written follow-up within 15 calendar days, incidents pertaining to: fatalities; injuries; LoWC; fires; explosions; all collisions resulting in property or equipment damage >\$25K; structural damage to an OCS facility; cranes; incidents that damage or disable safety systems or equipment (including firefighting systems).	Oral .5	1,550	775
		Written 4	1,535	6,140
187(d)	Report all spills of oil or other liquid pollutants.	Burden covered with 30 CFR 254 (1010-0091).		0
188(a)(5)	Report to District Manager hydrogen sulfide (H2S) gas releases immediately by oral communication.	Oral burden covered under 1010-0141.		0
188(b); 190(a), (b)	Provide written report to the District Manager within 15 calendar days after incidents relating to: injuries that result in 1 or more days away from work, on restricted work, or job transfer; gas releases that initiate equipment or process shutdown; property or equipment damage >\$25K; operations personnel to muster for 4 evacuation not related to weather or drills; any additional information required.	4	405	1,620
191	Submit written statement/compensation re: accident investigation.	Exempt under 5 CFR 1320.4(a)(2), (c).		0
193	Report apparent violations or non-compliance.	1.5	3 reports	5 (rounded)
194 NTL exception requests	Request departures from conducting archaeological resources surveys and/or submitting reports in GOMR.	1	95 requests	95
194(c)	Report archaeological discoveries (only one instance in many years; minimal burden).	10	2 reports	20
196	Submit data/information for post-lease G&G activity and request reimbursement.	Burden included with 30 CFR 251 (1010-0048).		0
101-199	General departure or alternative compliance requests not specifically covered elsewhere in Subpart A.	2	21 requests	42
Subtotal			3,611 responses	8,697

Citation 30 CFR 250 Subpart A and Related Forms/NTLs	Reporting or Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
				Fee
Recordkeeping				
108(e)	Retain records of design and construction for life of crane, including installation records for any anti-two block safety devices; all inspection, testing, and maintenance for at least 4 years; crane operator and all rigger personnel qualifications for at least 4 years.	2	2,562 record-keepers	5,124
109(b)	Retain welding, burning, and hot tapping plan and approval for the life of the facility.	.5	822 operations	411
132(b)(3)	During inspections make records available as requested by inspectors.	2	130 lessees/operators	260
Subtotal			3,514 responses	5,795
TOTAL BURDEN			18,397 Responses	36,239 Hours
			\$810,200 Fees	

* Due to the Amber Resources Company v US litigation involving 36 suspended leases, operators in the Pacific Region did not respond to our inquiry because of the sensitivity of the matter.

13. Provide an estimate of the total annual [non-hour] cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

(a) The cost estimate should be split into two components: (1) a total capital and start-up cost component (annualized over its expected useful life) and (2) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information [including filing fees paid]. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

(b) If cost estimates are expected to vary widely, agencies should present ranges of cost burden and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

(c) Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

We have identified three non-hour cost burdens. Section 250.143 requires a fee for a change in designation of operator. Section 250.165 requires a State lessee applying for a right-of use and easement on the OCS to pay a cost recovery application fee. This cost is the same as the fee for a pipeline right-of-way grant specified in 30 CFR 250.1015 and is subject to change based on that

regulation. We estimate receiving only one application per year. Section 250.171 requests a fee for either a Suspension of Operations or Production Request (SOO/SOP). We have not identified any other “non-hour cost” burdens associated with this collection of information, and we estimate a total reporting “non-hour cost” burden of \$810,200. Refer to the chart in Section A.12 of this supporting statement for the specific fee breakdown.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

To analyze and review the information required by Subpart A, we estimate the Government will spend an average of approximately $\frac{3}{4}$ hour for each hour spent by the respondents for a total of 27,179 (rounded) hours. Based on a cost factor of \$55 per hour, the cost to the Government is \$1,494,845 (36,239 hours x .75 = 27,179 hours x \$55 = \$1,494,845). However, this cost is offset by the amount of revenues received from the filing fees discussed in item A.13. Therefore, the total estimated cost to the Government is \$684,645 (\$1,494,845 - \$810,200 = \$684,645).

15. Explain the reasons for any program changes or adjustments.

The currently approved OMB inventory includes 24,741 burden hours. This submission requests 36,239 hours. The adjustment **increase** of 11,498 hours is due to re-estimating the average annual responses and the amount of time required to respond based on consultations.

The currently approved OMB non-hour cost inventory includes \$663,102. This submission requests \$810,200. The adjustment **increase** of \$147,098 is a result of re-estimating the number of annual responses.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The MMS will not tabulate or publish the data.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

MMS will display the OMB approval number and OMB expiration date on Forms MMS-132, MMS-1123, and MMS-1832. The remainder of this collection concerns regulatory requirements.

18. Explain each exception to the certification statement, “Certification for Paperwork Reduction Act Submissions.”

To the extent that the topics apply to this collection of information, we are not making any exceptions to the “Certification for Paperwork Reduction Act Submissions.”

B. Collection of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When employing statistical methods, the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed.

This section is not applicable for this collection. We will not employ statistical methods in this information collection.