

**SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION  
FOR 43 CFR PARTS 3100, 3120, AND 3150, AND SUBPART 3162  
FOR OIL AND GAS EXPLORATION, LEASING, AND DRAINAGE OPERATIONS  
OMB CONTROL NUMBER 1004-0185  
Previous Terms of Clearance: None**

**Note:** In this Supporting Statement:

- (1) The word “lessee” means a person holding record title of, or owning operating rights in, a lease under a Federal mineral leasing law that authorizes exploration for, extraction of, or removal of oil or gas.
- (2) The term “operating rights owner” means a person or entity holding operating rights in a lease issued by the United States or by an Indian (except Osage Tribe) lessor. A lessee may also be an operating rights owner if the operating rights in a lease or portion thereof have not been severed from record title.
- (3) The word “operator” means a person or entity, including but not limited to the lessee or operating rights owner, who has stated in writing to the authorized office that he/she is responsible under the terms of the lease for the operations conducted on the leased lands or a portion thereof.

#### **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 Bureau of Land Management (BLM) has various authorities to process information to determine whether applicants are qualified to conduct oil and gas exploration and leasing activities and whether oil and gas leases are protected from drainage. The Mineral Leasing Act (MLA) of 1920 (30 U.S.C. 181 *et seq.*) gives the Secretary of the Interior responsibility for oil and gas leasing on approximately 570 million acres of public lands and national forests, and private lands where the mineral rights are reserved by the United States. Federal and Indian (except Osage) oil and gas lessees, operators, and operating rights owners are required to retain and provide data so that the BLM may approve and monitor proposed oil and gas leasing and operations. The regulations at 43 CFR parts 3100, 3120, and 3150, and the Federal Oil and Gas Royalty Management Act of 1982 (FOGRMA) (30 U.S.C. 1701 *et seq.*) require oil and gas applicants to maintain records and provide nonform information to the BLM. The regulations at 43 CFR part 3100 and subpart 3162 specify that oil and gas lessees must ensure that their leases are protected from drainage.

The following statutes and regulations necessitate the information collections covered in this request:

- (a) Mineral Leasing Act of 1920, as amended (30 U.S.C. 181 et seq.);
- (b) Mineral Leasing Act for Acquired Lands of 1947, as amended (30 U.S.C. 351-359);
- (c) Various Indian leasing acts;
- (d) Section 1008 of the Alaska National Interest Lands Conservation Act, (16 U.S.C. 3148);
- (e) National Environmental Policy Act of 1969, as amended (42 U.S.C. 4321 et seq.);
- (f) Federal Oil and Gas Royalty Management Act (30 U.S.C. 1701-1758); and
- (g) Regulations under 43 CFR parts 3100, 3120, and 3150, and subpart 3162.

**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 information collections in this request enable the BLM to determine whether applicants are qualified to lease, explore for, and produce oil and gas, and enable the agency to fulfill its responsibilities to manage leases. Information is submitted in person or by mail to the proper BLM office or the Minerals Management Service. Respondents are businesses.

We require applicants to certify that they are citizens of the United States and do not own or control in excess of 246,080 acres in public domain and acquired lands of Federal oil and gas leases in a particular State, as required by law under 30 U.S.C. 184(d)(1) and under the regulations at 43 CFR 3101.2 and 3102. Legal descriptions of lands are required to determine where the involved Federal lands are located. Name and address are needed to identify the applicant and to allow the BLM to ensure that the applicant meets the requirements of the law. An attorney-in-fact or agent signature is needed only if an attorney or agent is filing the information required on behalf of an applicant or lessee. The information on the statements, petitions, offers, and applications is needed for BLM to process oil and gas leases and to comply with the terms and conditions of the statutes. BLM also needs the information to determine whether an entity is qualified to hold a lease and thereby obtain a benefit. We require applicants to certify they are complying with the regulations concerning parties of interest and qualifications, subject to criminal sanctions under 18 U.S.C. 1001. If the BLM does not collect the information contained on the applications, statements, petitions and offers, the leasing of oil and gas could not occur, and the Federal Government and some States would lose millions of dollars in revenues.

Information items contained in the regulations at 43 CFR part 3100 that do not require a form are listed below. We note items under the citation as they appear in the regulations. The collection occurs once prior to beginning each activity unless we state otherwise.

3100.3-1 - Option Enforceability. A notice of option holdings is required by the MLA (30 U.S.C. 184(d)(2)). BLM uses the information to determine acreage chargeability. The applicant must submit copies of the notice of options to BLM.

3100.3-3 - Option Statement. An option statement is required by the MLA. The holder of the option must submit a statement twice a year to BLM. We use the information to certify compliance with the regulations with respect to acreage chargeability.

3101.2-4(a) - Excess Acreage. The applicant must file a request with the BLM for additional time to divest excess acreage. BLM uses the information to determine whether to grant additional time.

3101.2-6 - Showing Required. We require statements showing date, acreage, and State in which each oil and gas lease is located. We do not routinely require such information; when requested, however, we need the information to determine that the lessee is in compliance with the law with respect to acreage limitation (30 U.S.C. 184(d)(2)).

3101.3-1 - Joinder Evidence Required. We require a statement as to whether or not a prospective oil and gas lessee has joined in a unit agreement if the lease is for lands within an approved unit.

3103.4-1 - Waiver, Suspension or Reduction of Rental, Royalty, or Minimum Royalty. We require an application or petition for such benefit. The MLA and the regulations require the information, and we need it to determine that development cannot be promoted or that the terms of the lease cannot be successfully met if the rental or royalty were not waived, suspended, or reduced.

3105.2 - Communitization or Drilling Agreements. The applicant must submit the agreement in order to obtain permission to join in oil and gas development with other lands. We use the information to determine that the lease, or portion thereof, may be subject to drainage by an off-lease well, and that it is in the public interest to combine operation efforts.

3105.3 - Operating, Drilling or Development Contracts. We require a statement showing any interest held by a contractor, and a copy of the contract. Operators must submit copies of contracts to obtain approval to enter into contracts with a number of lessees sufficient to justify operations on a large scale.

3105.4 - Combination for Joint Operations or for Transportation of Oil. Lessees or operators must file an application in order to seek approval to combine their interests in leases for the purpose of constructing and carrying on the business of a refinery or of establishing and constructing as a common carrier a pipeline or lines or railroads to be operated and used by them jointly in the transportation of oil or gas from their wells or from the wells of other lessees.

3105.5 - Subsurface Storage of Oil and Gas. Any interested party who wants to obtain authorization to store oil and gas underground on Federal lands must file an application. The information we require is necessary to authorize subsurface storage. Subsurface storage avoids waste and promotes conservation of the natural resources.

3106.8-1 - Heirs and devisee. In case of the death of an offeror, applicant, lessee, or transferee, we require a statement that heirs and devisee are qualified to hold a lease interest.

3106.8-2 - Change of Name. A change of name of the lessee should be reported to the proper BLM office. The notice of name change must include a list of serial numbers of the leases affected. This information is necessary for acreage chargeability purposes.

3106.8-3 - Corporate Merger. We require that the lessee notify us of a corporate merger along with a list of affected leases, which we use to determine acreage accountability.

3107.8 - Renewal Leases. We require an application for lease renewal, but no specific form. The applicant may use Form 3100-11 to submit the required information.

3108.1 - Relinquishments. A lessee may relinquish a lease only after filing a written relinquishment of a lease or subdivision; there is no specific form.

3108.2-2, 3108.2-3, and 3108.2-4 - Reinstatements. We require petitions of reinstatement showing that failure to pay rental or timely file required instruments was inadvertent, justifiable, or not due to the lack of reasonable diligence on the part of the lessee. FOGRMA requires the information, and we use it to determine whether the petitioner is eligible for Class I, II, or III reinstatements.

3109.1 - Leasing Under Rights-of-Way. We require an application, but no specific form, to lease certain lands within of rights-of-way for the underlying oil and gas. Form 3100-11 is optional. BLM needs the information under the Act of May 21, 1930, which authorizes the leasing of, or the entering into a compensatory royalty agreement for, oil and gas deposits under railroads and certain other types of rights-of-way.

3120.1-1(e) - Lands available for competitive leasing. We collect information from parties who want specific lands placed for competitive oil and gas lease sale. The entity must describe the lands with enough specificity that BLM can determine what the entity is requesting.

3120.1-3 - Protests and appeals. If a party disagrees with BLM placing certain lands for competitive oil and gas lease sale, it must provide BLM with justification.

3152.1 - Application for Oil and Gas Exploration Permit in Alaska. We require the information under this section for any person wishing to conduct oil and gas geophysical exploration operations in Alaska under the Section 1008 of the Alaska National Interest Lands Conservation Act (16 U.S.C. 3148). BLM needs the information to determine that the applicant complies with the terms and conditions of the law.

3152.6 - Collection and Submission of data. Once an exploration permit has been granted, the BLM requires the information under this section to enable us to determine what actions and operations the exploration permittee intends, and to determine whether the permittee complies with the terms and conditions of the exploration permit.

3152.7 - Completion of Operations. We require a completion report containing a description of the work, dates of exploration, maps showing the exploration area, and a statement that all terms and conditions of the permit were complied with, or outline the corrective measures that will be taken to rehabilitate the lands. We need the information to determine that the operations are complete.

3162.2-9 — Drainage Protection Reports — Preliminary, Detailed, and Additional. Drainage occurs when a well is drilled close enough to the boundary of an adjacent parcel that oil or gas migrates from that parcel to the well. These information collections assist the BLM in meeting its responsibility to protect the public, and Indian lessors, from drainage that could result in reduced royalties for their oil and gas resources.

While the lessee has the primary responsibility to protect lessors from drainage, the BLM routinely monitors drilling activities to determine whether appropriate steps are being taken to ensure that Federal and Indian leases are not being drained. Based on knowledge of reservoir conditions that vary from basin to basin, the BLM has determined that approximately 1,000 of the leases it administers are located close enough to other wells to warrant further inquiries to determine if drainage is occurring. The BLM requires holders of those leases to submit a preliminary drainage protection report each year. That report is based on publicly available information such as well completion reports, sundry notices, and production reports.

In addition to reviewing preliminary drainage protection reports, the BLM also conducts an administrative review of those 1,000 leases each year. Approximately 100 are determined annually to have the potential for creating drainage situations. The BLM sends the affected lessees/operating rights owners an initial contact letter, and in response, they are required to submit a detailed drainage protection report. The content of the report varies depending on the circumstances. The usual response indicates that a review of each drainage situation has been completed, and action is being taken that will sufficiently protect the BLM-administered lease from drainage.

In a typical year, the BLM sends a demand letter that requires an additional drainage protection report from about 10 of the 100 lessees/operating rights owners. Demand letters are sent when the BLM believes that lessees and operating rights owners did not gather sufficient data to determine whether drainage is occurring or has not occurred, or did not analyze the data properly to determine that a protective well would be uneconomic. In the response, the lessee or operating rights owner notifies the BLM of plans for drainage protection and analysis and, if requested by BLM, discloses the drainage area of the ultimate recovery of the offending well, the amount of oil and gas resources drained from the lease, and whether a protective well would be economic to drill.

**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.]**

Over the next few years, the BLM will continue to computerize data to better assist the public in accessing information it needs to complete statements, applications, and permits. The BLM's website for electronic forms is <https://www.blm.gov/FormsCentral/show-home.do>. This particular collection is nonform. And while the use of Form 3100-11, Offer to Lease and Lease for Oil and Gas, is optional, it is available electronically in fillable .pdf format. We estimate that about 10% of the information will be submitted electronically.

**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.**

No duplication of information occurs on the information we collect. The requested information is nonrecurring, occasional, and unique to each applicant/operator and to each specific oil and gas activity and is not available from any other data source. No similar information is available or able to be modified. The information is supplied by the respondents, which are entities conducting oil and gas exploration and leasing activities. The information is required to receive a benefit. Each BLM State Office has jurisdiction over specific lands, so no duplication occurs with respect to processing a respondent's application or information.

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

There is not a significant impact on small businesses or other small entities from the information we request. The required information is the minimum necessary to allow the BLM to process an applicant's information about oil and gas activities and drainage protection and to comply with provisions of the applicable laws and regulations.

**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.**

An individual or entity uses applications and statements to submit information regarding oil and gas offers and leases on public domain and acquired lands. If the information is not provided, lands cannot be leased, explored or developed, which would prevent the individual or entity from obtaining the benefit of an oil and gas lease.

Failure to collect the requested information would mean that the BLM would lack the necessary information to approve proposed oil and gas leasing and operations activities or to monitor compliance with granted approvals and applicable laws; and, the BLM would lack the necessary information to ensure lessees/operating rights owners are fulfilling their obligations to determine whether any producing wells on adjacent or nearby land may be draining the oil and gas under their leases.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
- \* requiring respondents to report information to the agency more often than quarterly;
  - \* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
  - \* requiring respondents to submit more than an original and two copies of any document;
  - \* requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
  - \* 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;
  - \* requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
  - \* 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; or
  - \* 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.

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 43 CFR 1320.5.

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 three 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.

The required 60-day notice was published in the **Federal Register** on November 20, 2008 (73 FR 70363), and the comment period closed January 20, 2009. The BLM did not receive any comments.

We consulted with the following respondents to solicit comments on the burden hour and cost estimates, frequency of collection, clarity of instructions, reporting format and data elements. The burden estimates in Item 12, below, reflect the responses. Also, BLM field offices interact on a regular basis with oil and gas industry customers when information is processed to note whether there are complaints, difficulties, or problems encountered by respondents in providing and completed required information. No difficulties were reported.

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2597 East Bridger Blvd.  
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(801) 942-0525

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

We do not provide payments or gifts to respondents.

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

We protect the respondent's confidentiality to the extent consistent with the Freedom of Information Act (5 U.S.C. 552).

Under the privacy provisions of the E-Government Act of 2002, individuals/respondents are informed as to whether or not providing the information is mandatory to obtain a benefit. The



BLM has firewalls to protect web site access, strong security and password protection, and other security measures to protect electronic information.

**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.**

We do not ask respondents questions of a sensitive nature.

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

**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.**

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

**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.**

These estimates are based on past and current experience with processing information in this collection. Respondents providing information are businesses which are, generally, familiar with the requirements. We estimate that it will take an average of slightly more than 1 hour to about 1.5 hours to complete each of the various applications, petitions, offers, and statements required. The applicants have access to records, plats, and maps necessary for providing legal land descriptions. The type of information necessary is outlined in the regulations, and the respondents already maintain it for their own recordkeeping purposes. It needs only to be compiled in a reasonable format. The estimate also includes the time required for assembling the information and the time of clerical personnel, if needed.

It is estimated that approximately 1,770 applications, offers, petitions, or statements will be filed annually for a total of 2,235 reporting hours. Respondents are businesses. The table below itemizes and summarizes the burden hours.

***Table 12-1 – Hourly Cost Calculations:*** The hourly mean wage in Table 12-1, below, is based on data for full-time, private-industry .“Professional and related,” on page 21, Table 11 of Bureau of Labor Statistics News Release USDL: 09-0634 (“Employer Costs for Employee Compensation — March 2009” (dated June 10, 2009), at <http://www.bls.gov/news.release/pdf/ecec.pdf>. The benefits multiplier is based on data in the table titled, “Relative Importance of Employer Costs for Employee Compensation, March 2009,” on page 4 of the same News Release.

<b>Mean hourly wage</b>	<b>Benefits multiplier</b>	<b>Total mean hourly wage (including benefits)</b>
\$33.61	1.4	\$47.05

**Table 12-2 – Estimates of Hour and Cost Burdens:** The burden estimates in Table 12-2, below, are based on the number of responses received annually in the last 3 years, information obtained from respondents, and the BLM's experience with the information collections. **The frequency of response for each of the information collections is one per year.**

Hour and cost burdens to respondents include time spent for researching, preparing, and submitting information. There are no capital and startup costs involved because the information requested is either available in the BLM public reading rooms or maintained by the lessees, applicants, and operators for their own use (for example, maps, reports, and lease files). The landsman/attorney/clerical personnel compile and complete the applications, permits, statements, and petitions from information already on hand. Their estimated per-hour costs are shown at Table 12-1, above. Respondents submitting the applications and statements are businesses which are familiar with oil and gas regulatory requirements.

A. Information Collection (43 CFR)	B. # of Response s Annually	C. Annual Hour Burden (# of Responses x Hours per Response)	D. Annual Cost Burden (C x Total Mean Hourly Wage)
Notice of option holdings, § 3100.3-1	30	30 x 1 = 30	\$1,411.50
Option statement, § 3100.3-3	50	50 x 1 = 50	\$2,352.50
Excess acreage petition, § 3101.2-4(a)	10	10 x 1 = 10	\$470.50
Showings statement, § 3101.2-6	10	10 x 1.5 = 15	\$705.75
Joinder evidence statement, § 3101.3-1	50	50 x 1 = 50	\$2,352.50
Waiver, suspension, reduction of rental, etc., § 3103.4-1	20	20 x 2 = 40	\$1,882.00
Communitization or drilling agreement, § 3105.2	150	150 x 2 = 300	\$14,115.00
Operating, drilling, or development contracts interest statement, § 3105.3	50	50 x 2 = 100	\$4,705.00
Joint operations, transportation of oil application, § 3105.4	20	20 x 1 = 20	\$941.00
Subsurface storage application, § 3105.5	50	50 x 1 = 50	\$2,352.50
Heirs and devisee statement, § 3106.8-1	40	40 x 1 = 40	\$1,882.00
Change of name report, § 3106.8-2	60	60 x 1 = 60	\$2,823.00
Corporate merger notice, § 3106.8-3	100	100 x 2 = 200	\$9,410.00
Lease renewal application, § 3107.8	30	30 x 1 = 30	\$1,411.50
Relinquishment, § 3108.1	150	150 x 0.5 = 75	\$3,528.75
<b>A.</b>	<b>B.</b>	<b>C.</b>	<b>D.</b>

<b>Information Collection (43 CFR)</b>	<b># of Responses Annually</b>	<b>Annual Hour Burden (# of Responses x Hours per Response)</b>	<b>Annual Cost Burden (C x \$47.05)</b>
Reinstatement petition, §§ 3108.2-2, 3108.2-3, and 3108.2-4	500	500 x 0.5 = 250	\$11,762.50
Leasing under right-of-way application, § 3109.1	20	20 x 1 = 20	\$941.00
Lands available for leasing, § 3120.1-1(e)	280	280 x 2.5 = 700	\$32,935.00
Protests and appeals, § 3120.1-3	90	90 x 1.5 = 135	\$6,351.75
Application for exploration in Alaska, § 3152.1	20	20 x 1 = 20	\$941.00
Data collection, § 3152.6	20	20 x 1 = 20	\$941.00
Completion of operations report, § 3152.7	20	20 x 1 = 20	\$941.00
Preliminary drainage protection report, § 3162.2-9	1,000	1,000 x 2 = 2,000	\$94,100
Detailed drainage protection report, § 3162.2-9	100	100 x 24 = 2400	\$112,920
Additional drainage protection report, § 3162.2-9	10	10 x 20 = 200	\$9,410
<b>Totals</b>	<b>2,880</b>	<b>6,835</b>	<b>\$321,586.75</b>

**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).**

- \* **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) 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.**
- \* **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens 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.

- \* 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.

Respondents are not required to purchase additional computer software or hardware to comply with this information collection. There are no filing fees for filing this information.

**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.**

The cost to the Federal Government to process the various applications, permits, petitions, and statements and for staff time to evaluate drainage analyses is shown below. We estimate drainage cases at 8 hours for each of 110 analyses.

We estimate the total annual cost to the Federal Government to process the responses for this information collection is \$72,055.60 based on the salary/benefit amounts shown below:

Position	Grade	Hourly pay rate*	Hourly rate including benefits (1.5 x hourly rate)*	Number of hours worked	Cost per year
Supervisor	GS-13, Step 1	\$33.84	\$50.76	100	\$5,076.00
Geologist or Petroleum Engineer	GS-12, Step 1	28.45	\$42.67	880	37,549.60
Adjudicator	GS-9, Step 1	\$19.62	\$29.43	1000	\$29,430
<b>Total</b>					<b>\$72,055.60</b>

\*Hourly pay rate based on the Office of Personnel Management 2009 General Schedule (Base) Salary Table, effective January 2009. The benefits multiplier is based on data in the table titled, "Relative Importance of Employer Costs for Employee Compensation, March 2009," on page 4 of Bureau of Labor Statistics News Release USDL: 09-0634 ("Employer Costs for Employee Compensation — March 2009" (dated June 10, 2009)), at

<http://www.bls.gov/news.release/pdf/ecec.pdf>.

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

There are no program changes or adjustments.

**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.**

We will not publish results of this information collection.

**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.**

BLM will display the expiration date of this OMB approval.

**18. Explain each exception to the certification statement.**

There are no exceptions to the certification statement.