

**Supporting Statement for Paperwork Reduction Act Submissions  
(Final Rulemaking)  
Revisions to Subpart A – General; Subpart I – Platforms and Structures; and  
Subpart J – Pipelines and Pipeline Rights-of-Way (ROW)  
Form MMS-143 – Facility/Equipment Damage Report  
Current OMB ICR Reference Number: 200805-1010-002  
Previous ICR Reference Number: 200606-1010-002**

**Terms of Clearance:** Prior to publication of the final rule, the agency must provide to the Office of Management and Budget (OMB) a summary of all the comments related to the information collection and its responses.

### **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 employing statistical data, Section B of the Supporting Statement must be completed. The 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 (Secretary) 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 43 U.S.C. 1356 requires the issuance of “. . . regulations which require that any vessel, rig, platform, or other vehicle or structure . . . (2) which is used for activities pursuant to this subchapter, comply, . . . with such minimum standards of design, construction, alteration, and repair as the Secretary . . . establishes; . . .” Section 43 U.S.C. 1332(6) also states, “operations in the [O]uter Continental Shelf should be conducted in a safe manner . . . to prevent or minimize the likelihood of . . . physical obstruction to other users of the water or subsoil and seabed, or other occurrences which may cause damage to the environment or to property, or endanger life or health.” These authorities and responsibilities are among those delegated to the Minerals Management Service (MMS) to ensure that

operations in the OCS will meet statutory requirements; provide for safety and protection of the environment; and result in diligent exploration, development, and production of OCS leases.

On July 3, 2006 (71 FR 37874), MMS published a notice of proposed rulemaking. The proposed rule added new information collection requirements. The Office of Management and Budget requested that prior to publication of the final rule, the agency must provide to OMB a summary of all the comments related to the information collection and its responses. The MMS is now ready to publish the final rulemaking and this submission requests approval of the revised information collection requirements in the final regulations.

The changes in the final regulations that require this submission include some section numbering changes and reduction of the burden hours almost by half. The final regulations were changed because:

- (1) In § 250.192(a)(3) – the burden hours were inadvertently added into the proposed rulemaking, but the requirement and burden hours have always been covered in existing regulations and the ICR;
- (2) In § 250.919(a), the burden hours for the April plan submission were removed because of comments received and clarifications made in the final regulations. The November report submission of this requirement is still in place.
- (3) The burdens for the reporting requirements in proposed § 250.192(b) were reduced because it was determined that based on comments received, submitting information weekly would be too short a turnaround for accurate reporting information.
- (4) Also, in proposed § 250.920(f) the reporting burden was lowered, based on comments received, from annually to once every 5 years or as directed by the Regional Supervisor with the revised citation changing to § 250.920(e).

When the rulemaking becomes effective, we will merge these burdens into their primary subparts – Subpart A–1010-0114; Subpart I–1010-0149; and Subpart J–1010-0050. In addition, this ICR incorporates the hours and requirements already approved in 1010-0164. When final regulations take effect, we will submit a discontinuation request to OMB for the collection under 1010-0164.

***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.]***

For the information proposed in subpart A, MMS would require lessees, lease operators, and pipeline ROW holders to submit reports to MMS if their facilities are damaged by a hurricane, earthquake, or other natural phenomenon. A new form (Form MMS-143, Facility/Equipment Damage Report) has been developed to assist lessees, lease operators, and pipeline ROW holders when reporting this damage. Adding this requirement to the regulations will allow MMS to request damage information without the delay. This information will allow MMS to rapidly assess damage and project any disruption of oil and gas production from the OCS after a major environmental event.

The MMS would require lessees, lease operators, and pipeline ROW holders to submit damage reports to MMS if their facilities are damaged by natural phenomenon, accident, or sabotage. This information, when submitted, will allow MMS to rapidly assess damage and project any disruption of oil and gas from the OCS after a major environmental occurrence, e.g., Hurricanes Lili, Ivan, and Katrina, earthquakes, etc.

Form MMS-143 (Facility/Equipment Damage Report) is submitted to summarize damage. The MMS uses the information to assess damage and project any disruption of oil and gas production from the OCS after a major environmental event. The form asks for, in either fill in the blanks or check marks:

- general information relating to the company;
- facility name, area, block, and lease;
- damage type, description, and initial assessment;
- production rate at shut-in time;
- cumulative production shut-in; and
- estimated time to return to service (days).

The MMS will use the information collected under subpart I to ensure that lessees, lease operators, and pipeline ROW holders are appropriately assessing their OCS structures to ascertain their fitness for continued use. The MMS is also requesting that special surveys are conducted after a platform is exposed to an extreme environmental event such as an earthquake or hurricane. We are requesting that lessees and lease operators submit a summary of the safety factors utilized when designing their platforms. This requirement was included in previous MMS regulations, but was omitted in the recently published subpart I due to an oversight. This information is necessary to determine that fixed and floating platforms and structures are sound and safe for their intended purpose and the safety of personnel and pollution prevention.

The MMS will use the information collected under subpart J during the permitting process if the lessee, lease operators, and pipeline ROW holders intend to use unbonded flexible pipe or a pipeline riser with a floating platform. This will help ensure that operators are using the latest technology when installing unbonded flexible pipe or pipeline risers. These changes are necessary to give MMS the minimum tools needed to adequately monitor the condition of platforms on the OCS, and to ensure the safety of new pipeline riser installations at floating structures.

Incorporating API RP 2I, "In-Service Inspection of Mooring Hardware for Floating Drilling Units," provides industry with specific standards to address the inspection of mooring chain and wire rope for Mobile Offshore Drilling Units (MODUs), which frequently move from location to location. Making mandatory this now voluntary standard dictates that respondents comply with the requirements in the incorporated documents.

***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].***

Based on prior OMB approved Emergency ICR requests relating to hurricanes (1010-0152, 1010-0159, and 1010-0163), 75 percent of the requested information has been previously submitted using information technology. Once this rulemaking becomes effective, we expect lessees and operators and their Independent Verification Agents (IVAs) or other third-party reviewers of production facilities, to submit the required information 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.***

The information collected is unique to each fixed and floating platform and location. Similar information is not available from other sources. The Departments of the Interior, Transportation, and U.S. Coast Guard have Memoranda of Understanding that define the responsibilities of their agencies with respect to activities in the OCS. These are effective in avoiding duplication of regulations and reporting requirements.

**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. However, approximately 70 percent of the lessees and operators may have less than 500 employees and would be considered small businesses. The burden on any small entity subject to these regulations cannot be reduced to accommodate them without sacrificing safe operations and pollution prevention.

**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.***

The OCS Lands Act (OCSLA) mandates that operations in the OCS should be conducted in a safe manner. If we did not collect the information, we would be unable to comply with the OCSLA to determine if fixed and floating platforms are structurally sound and safe. Design, and reassessment information is only collected once or as changing conditions necessitate. Therefore, frequency is not applicable. Inspection information is collected annually. Less frequent collection will not permit us to monitor the safety of platforms and structures. Damage reports are submitted monthly until the structure/equipment is returned to service.

**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.***

The collection of information pertaining to amending and/or updating Form MMS-143 is submitted monthly after completing the initial Facility/Equipment Damage Report within 48 hours, and should, on the final report, include the date item returned to service. This will allow MMS to rapidly assess damage repairs being done to previously disrupted structures, pipelines, etc. Design and reassessment information is only collected once or as changing conditions necessitate.

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

Not applicable in this collection.

***(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.***

The rule retains the requirement for respondents to compile, retain, and make available to MMS for the functional life of the platform, the as-built structural drawings, the design assumptions and analyses, a

summary of the nondestructive examination records, and the inspection results from platform inspections. The OCSLA requires the Secretary to issue regulations on the minimum standards of design, construction, alteration, and repair of structures in the OCS. Retaining this information for the “functional life of the platform” is critical as the history of a structure has a substantial effect on determining its current safety, probable strength, and integrity. As platforms and structures age, we must have access to the initial structural properties and inspection results to determine whether necessary 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.

***(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 1320.11, MMS provided the 60-day review and comment process in the preamble of the proposed rulemaking (71 FR 37874). We received four comments and the comments received are

addressed, including those on information collection, in the preamble of the final rulemaking. Because of the comments received, MMS reduced the burden by almost half, either by eliminating the requirement or by reducing how often the respondent needs to submit the requirement (weekly vs monthly), see A.1 and A.15. The respondents who submitted comments were: Offshore Operators Committee and Texas Oil & Gas Association, which are trade organizations that represent numerous oil and gas companies, North Slope Borough, and Marathon Pipe Line, LLC.

- We received two comments that questioned whether submitting Form MMS-143 was required in addition to reports required by Notices to Lessees (NTL) such as NTL 2005-G20, "Damage Caused by Hurricanes Katrina and Rita." These reports are separate. The evacuation and production curtailment statistics required by the form are general status reports. The reports required by NTLs are detailed reports on the findings of any surveys, inspections, and damage assessments as well as remediation plans. There were no changes to the IC.

- One commenter felt that the requirement at proposed § 250.192(b)(1), that operators submit an initial damage report within 48 hours using Form MMS-143, Facility / Equipment Damage Report, gave operators too little time to check into repair availability. With inadequate time to check on repair and equipment availability, the operator contended that the form could not be completed. The commenter also proposed that subsequent reports should be submitted only when new information is available or the status changes. We partially agree and have changed both the final rule and Form MMS-143. Both the rule and the form now make clear that the portion of the form requiring an operator to estimate the time needed to return the facility / equipment to service need not be completed until the availability of hardware and repair capability has been established. Operators must however, provide this information to the best of their availability within 30 days of submitting their initial damage report. Subsequent reports were also changed from weekly to monthly and when new information is available. These changes resulted in -300 burden hours.

- Two commenters requested that proposed § 250.919 concerning in-service inspections be rewritten to clearly exclude pipelines. The section was not changed. The current wording specifies that the in-service inspections apply to the above- and below-water structure of all platforms, as well as pertinent components of the mooring system for floating platforms. There were no changes to the IC.

- Commenters questioned the rationale for requiring a complete list of all the platforms (and supporting data) to be submitted annually, when in many cases the data does not change from year to year. One commenter also felt that it was overly burdensome to require an annual plan to be submitted in April and a report on the results of the plan to be submitted in November, as required currently by § 250.919(b). The MMS agrees with these comments and has deleted the requirement and its burden hours for the April annual inspection plan. A slightly revised inspection report will still be required annually on November 1. These changes resulted in -32,500 burden hours.

- One commenter was confused by MMS requirements in proposed § 250.920 for assessment of platforms. The commenter noted that the requirements as proposed should only apply to fixed platforms and further noted a lack of direction for operators wishing to obtain approval for assessing their platform to either the medium (A-2) or low (A-3) consequence-of-failure exposure category. The MMS agrees with these comments and has modified the final rule

accordingly. Under the final rule, § 250.920 has been retitled and now refers only to fixed platforms. Changes were also made to the section to more closely track the wording of API RP 2A-WSD. This change resulted in making the requirement from annually in the proposed rule to every 5 years or as directed by the Regional Supervisor in the final rule for -4,160 burden hours.

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

The MMS will not provide payment or gifts to respondents in this collection.

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

We protect proprietary information according to the Freedom of Information Act (5 U.S.C. 552) and its implementing regulations (43 CFR 2), 30 CFR 250.197, “Data and information to be made available to the public or for limited inspection,” and 30 CFR part 252, “OCS Oil and Gas Information Program.”

**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.**

Potential respondents are approximately 130 Federal OCS lessees, operators, and their IVAs or other third-party reviewers of production facilities, as well as 207 pipeline right-of-way holders. The frequency of response is on occasion. We estimate the annual burden is 50,287 reporting and recordkeeping hours. Refer to the chart below for a breakdown of the burden.

**BURDEN TABLE**

Citation 30 CFR 250 Rule and NTL(s)	Reporting and Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
<b>Subpart A</b>				
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.	Burden approved under collection 1010-0114.		0
192(b)	Use Form MMS-143 to submit an initial damage evaluation report to the Regional Supervisor.	4	100	400
192(b)	Use Form MMS-143 to submit subsequent damage reports on a monthly basis until damaged structure or equipment is returned to service; immediately upon information in previous reports change; include date item returned to service in final report.	1	100	100
<b>Subpart I</b>				
900(c)	Notify MMS with a written report listing damage and emergency repairs; request approval of repairs; notify USCG when appropriate.	Burden approved under collection 1010-0149.		0
900(e)	Re/Submit platform installation date and the final as-built location to the Regional Supervisor within 45 days after platform installation.	.5	140	70
905(i)	Provide a summary of safety factors utilized in the design of the platform.	.25	331	83
911; 916; 917; 918	Submit complete schedule of all phases of design, fabrication, and installation with required information; also submit Gantt Chart with required information.	40	15	600
916(c)	Submit interim and final CVA reports and recommendations on design phase.	Burden approved under collection 1010-0149.		0
917(a), (c)	Submit interim and final CVA reports and recommendations on fabrication phase, including notice of fabrication procedure changes or design specification modifications.	Burden approved under collection 1010-0149.		0
918(c)	Submit interim and final CVA reports and recommendations on installation phase.	Burden approved under collection 1010-0149.		0
919	Submit annual (November 1 of each year) report on inspection of platforms or floating production facilities, including summary of testing results.	Burden approved under collection 1010-0149.		0
919(b) NTL	After an environmental event, submit to Regional Supervisor initial report followed by updates and supporting information.	12 (initial)	150	1,800
		12 (update)	90	1,080
919(c) NTL	Submit results of inspections; obtain MMS approval before making major repairs.	120	200	24,000
920(a)	Demonstrate platform is able to withstand environmental loadings for appropriate exposure category.	20	400	8,000
920(c)	Submit application and obtain approval from the Regional Supervisor for mitigation actions (includes operational procedures).	40	200	8,000
920(e)	Submit a list of all platforms you operate, and appropriate supporting data, every 5 years or directed by the Regional Supervisor.	40	130 operators / 5 years = 26 per year	1,040



<b>Citation 30 CFR 250 Rule and NTL(s)</b>	<b>Reporting and Recordkeeping Requirement</b>	<b>Hour Burden</b>	<b>Average No. of Annual Responses</b>	<b>Annual Burden Hours</b>
920(f)	Obtain approval from the Regional Supervisor for any change in the platform.	40	100	4,000
<b>Subpart J</b>				
1007(a)(4) (i)(A); (B); (C)	Provide specified information in your pipeline application if using unbonded flexible pipe.	4	6	24
1007(a)(4) (i)(D)	Provide results of third party IVA review in your pipeline application if using unbonded flexible pipe.	40	1	40
1007(a)(4) (ii)	Provide specified information in your pipeline application.	30	35	1,050
<b>TOTAL BURDEN</b>			<b>1,894 responses</b>	<b>50,287 hours</b>

*(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.*

The average respondent cost is \$74/hour (rounded). This cost is broken out in the below table using the Bureau of Labor Statistics\* data for the Houston, TX area. See BLS website: <http://www.bls.gov/bls/wages.htm>.

<b>Position</b>	<b>Level</b>	<b>Hourly Pay rate (\$/hour estimate)</b>	<b>Hourly rate including benefits (1.4** x \$/hour)</b>	<b>Percent of time spent on collection</b>	<b>Weighted Average (\$/hour)</b>
General Office Clerk	7	\$20	\$28	10%	\$3
Petroleum Engineer	12	\$55	\$77	80%	\$62
Supv. Petroleum Engineer	15	\$66	\$92	10%	\$9
<b>Weighted Average (\$/hour)</b>					<b>\$74</b>

\* Please note that this BLS source reflects their last update from July 2004.

\*\* A multiplier of 1.4 (as implied by BLS news release USDL 07-1883, December 11, 2007) was added for benefits.

Based on a cost factor of \$74 per hour, we estimate the total annual cost to industry is \$3,721,238 (\$74 x 50,287 hours = \$3,721,238).

**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 no paperwork non-hour cost burdens for this collection of 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 average Federal cost is \$58/hour (rounded). This cost is broken out in the below table using the 2008 Office of Personnel Management pay schedule for the New Orleans, LA area.

<b>Position</b>	<b>Grade</b>	<b>Hourly Pay rate (\$/hour estimate)</b>	<b>Hourly rate including benefits (1.5* x \$/hour)</b>	<b>Percent of time spent on collection</b>	<b>Weighted Average (\$/hour)</b>
Clerical	GS-7/5	\$18	\$27	5%	\$1
Petroleum Engineer	GS-13/5	\$37	\$56	80%	\$45
Supv. Petroleum Engineer	GS-15/5	\$52	\$78	15%	\$12
<b>Weighted Average (\$/hour)</b>					<b>\$58</b>

\* A multiplier of 1.5 (as implied by BLS news release USDL 07-1883, December 11, 2007) was added for benefits.

To analyze and review the information required by the rulemaking, we estimate the Government will spend an average of 1 hour for each hour spent by respondents for a total of 50,287 hours. Based on a cost factor of \$58 per hour, the total annualized cost to the Government is \$2,916,646 (50,287 x \$58 = \$2,916,646).

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

This submission requests a program increase of 50,287 hours. It reflects the revised section numbers that changed from the proposed to final regulations. The difference in the burden hours from proposed to final rule is a result of:

- removing duplicate reporting burden in proposed § 250.192(a)(3) – 100 hours
- removing the April reporting burden under proposed § 250.919(a).  
The November report submission remains. – 32,500 hours
- reducing the weekly burden in § 250.192(b) to monthly – 300 hours
- reducing the burden in § 250.920(e) from annually  
to once every 5 years – 4,160 hours

As stated in item A.I, when final regulations take effect, we will ultimately merge these burdens into their primary subparts – Subpart A – 1010-0114; Subpart I – 1010-0149; and Subpart J – 1010-0050, and submit a discontinuation request for the collection under 1010-0164.

***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.***

Not applicable, as this collection of information concerns requirements in regulations.

***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.”