

Supporting Statement for Paperwork Reduction Act Submissions
30 CFR 250, Subpart A, General
Forms MMS-132, MMS-143, MMS-1123, and MMS-1832
OMB Control Number 1010-0114
Current Expiration Date: November 30, 2010

Terms of Clearance

Upon approval of this Information Collection Request (ICR) please discontinue OMB control number 1010-0168. Response: The paperwork burden hours associated with 1010-0168, that was due to a multiple part rulemaking, were consolidated into their primary subparts. Therefore, the Office of Management and Budget (OMB) approved the discontinuation of 1010-0168 with a Notice of Action on July 31, 2009.

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. 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 to prescribe rules and regulations to manage the mineral resources of the OCS. Such rules and regulations will apply to all operations conducted under a lease, right-of-use and easement, or pipeline right-of-way. 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."

Section 1352 further requires that certain costs be reimbursed to the parties submitting required geological and geophysical (G&G) information and data. Under the Act, permittees are to be reimbursed for the costs of reproducing any G&G data required to be submitted. Permittees are to be

reimbursed also for the reasonable cost of processing geophysical information required to be submitted when processing is in a form or manner required by the Director and is not used in the normal conduct of the business of the permittee.

The Independent Offices Appropriations Act (31 U.S.C. 9701), the Omnibus Appropriations Bill (Pub. L. 104-133, 110 Stat. 1321, April 26, 1996), and 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 implementing policy, BOEMRE 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. Several requests for approval required in subpart A are subject to cost recovery, and Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE) regulations specify service fees for these requests.

This ICR covers 30 CFR 250, subpart A, General. This request also covers the related Notices to Lessees and Operators (NTLs) that BOEMRE 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 BOEMRE 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 and rigger training, crane operator qualifications, crane inspections, testing, and maintenance to ensure that lessees/operators perform operations in a safe and workmanlike manner and that equipment is maintained in a safe condition. The BOEMRE 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 plans, procedures, and records to ensure that welding is conducted in a safe and workmanlike manner by trained and experienced personnel.
- Provide lessees/operators 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, BOEMRE 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.
- 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 complies with the OCS Lands Act, other applicable laws, and BOEMRE regulations; 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/operator requests for suspension of operations, including production.
- 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. The BOEMRE 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 Gulf of Mexico OCS Region (GOMR) uses a reporting form, MMS-132, Evacuation Statistics, for respondents to report evacuation statistics when necessary. 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).
- Form MMS-143, Facility/Equipment Damage Report, assists lessees, lease operators, and pipeline right-of-way holders when reporting damage by a hurricane, earthquake, or other natural phenomenon. They are required to submit an initial damage report to the Regional Supervisor within 48 hours after completing the initial evaluation of the damage and then, subsequent reports, monthly and immediately, whenever information changes until the damaged structure or equipment is returned to service.
- Allow lessees/operators who exhibit unacceptable performance an incremental approach to improving their overall performance prior to a final decision to disqualify a lessee/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), Form MMS-1832, identified during inspections. The BOEMRE issues this form to the operator and the operator then corrects the INC(s), signs and returns the form to the BOEMRE Regional Supervisor within 14 days of issuance.

During the final rulemaking (71 FR 16033, March 30, 2006), the requirement for submitting a confidentiality agreement when required under § 250.197(c) was inadvertently not included. As a result, the requirement is being added to this ICR for a program increase (+1 burden hour).

Also, we separated out § 250.186 to stand on its own, since we felt that the regulatory requirement did not pertain only to incident reporting requirements for a program increase (+2,000 burden hours).

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 BOEMRE encourages respondents to use the forms available on the website and submit them electronically. At present, an estimated 90 percent of submittals pertaining to this collection are being 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.

The DOI has several Memoranda of Understanding (MOU) 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, a lessee/operator, or a particular request for BOEMRE 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, BOEMRE believes that it is imperative to upgrade our investigation analysis functions to ensure 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 may have an economic effect on a number of small entities. Any direct effects primarily impact the OCS lessees and operators. Many of these OCS lessees and operators have less than 500 employees and are considered small businesses as defined by the Small Business Administration. Regulations require safe work practices and protection of the environmental resources;

therefore, the hour burden on any small entity subject to these regulations and associated collections of information 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 (§ 250.197) require us to reimburse respondents for their costs of reproduction and processing of data and information that BOEMRE requests. We also pay respondents if they request reimbursement for food, quarters, or transportation they provide BOEMRE 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, BOEMRE 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 regulations under 30 CFR 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.

Two forms need to be filled out and submitted more often than quarterly in the event of a natural disaster (such as hurricanes or earthquakes) based on the requirements in § 250.192: (a) the storm which would make it necessary to evacuate platforms or rigs or to shut in production, requires daily reporting (Form MMS-132, used in the GOMR) during the emergency situation. The reporting requirement would cease when the emergency ended; (b) Form MMS-143 (Facility/Equipment Damage Report) requires an initial report within 48 hours after the respondent has evaluated the initial damage; then monthly reports until the item is returned to service. 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 BOEMRE within 14 days from the date of issuance. The BOEMRE issuing office cannot complete the records for an inspection until BOEMRE receives an acknowledgment of the INCs. Historical records indicate that 14 days is a reasonable time for returning the green copy to the BOEMRE 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 plans at the site where welding occurs. 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), BOEMRE provided a 60-day notice in the Federal Register on March 22, 2010 (75 FR 13563). Also, 30 CFR 250.199 and the Paperwork Reduction Act statement on forms MMS-132, MMS-143, MMS-1123, and MMS-1832 explain that the BOEMRE 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 BOEMRE. We received no comments in response to the Federal Register notice.

During the comment period, BOEMRE requested input from several respondents as to the availability of data, frequency of collection, clarity of instructions, and elements being collected. The burden estimates in Section A.12 reflect their input. The following respondents that commented were:

Hess Corporation, Keith Dupuis, Senior EHS Specialist,
(713) 609-5926, One Allen Center, 500 Dallas Street, Houston, Texas 77002

Eni US Operating Co. Inc., Kathy Gowland, Sr. Regulatory Specialist,
(504) 593-7152, 1250 Poydras St., Suite # 2000, New Orleans, Louisiana 70113

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 BOEMRE. 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 BOEMRE 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 BOEMRE approval may contain proprietary information related to performance standards or alternative approaches to conducting operations different from those approved and specified in BOEMRE regulations. We will protect this proprietary information according to the Freedom of Information Act, (5 U.S.C. 552), its implementing regulations (43 CFR 2), 30 CFR 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.

Potential respondents comprise Federal and State oil and gas or sulphur lessees/operators. It should be noted that not all of the potential respondents will submit information in any given year and some may submit multiple times. The burden estimates include the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. We estimate an annual reporting and recordkeeping burden of 44,413 hours. Refer to the burden table for a breakdown of the hour and non-hour cost burdens.

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
		Non-Hour Cost Burdens		
Authority and Definition of Terms				
104; 181; Form MMS-1832	Appeal orders or decisions; appeal INCs; request hearing due to cancellation of lease.	Exempt under 5 CFR 1320.4(a)(2), (c).		0
Performance Standards				
109(a); 110	Submit welding, burning, and hot tapping plans.	2	54 plans.	108
115; 116	Request determination of well producibility; make available or submit data and information; notify BOEMRE of test.	5	90 responses.	450
118; 119; 121; 124	Apply for injection or subsurface storage of gas; sign storage agreement.	10	7 applications.	70
Subtotal			151 responses	628 hours
Cost Recovery Fees				
125; 126	Cost Recovery Fees; confirmation receipt etc; verbal approvals pertaining to fees.	Cost Recovery Fees and related items are covered individually throughout this subpart.		0
Forms				
130-133; Form MMS-1832	Submit "green" response copy of Form MMS-1832 indicating date violations (INC)s corrected.	2	931 forms.	1,862
143	Report change of address; submit designation of local agent.	Not considered information collection under 5 CFR 1320.3(h)(1).		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
		Non-Hour Cost Burdens		
143; 144; 145; Form MMS-1123	Submit designation of operator (Form MMS-1123 – form takes 15 minutes); report change of address; notice of termination; submit designation of local agent; include pay.gov confirmation receipt.	1	840 forms.	840
		\$164 fee x 840 = \$137,760*		
186(a)(3); NTL	Apply to receive administrative entitlements to eWell (electronic/digital form submittals).	Not considered information collection under 5 CFR 1320.3(h)(1).		0
192; Form MMS-132	Daily report of evacuation statistics for natural occurrence/hurricane (Form MMS-132 (form takes 1 hour) in the GOMR) when circumstances warrant; inform BOEMRE when you resume production.	1.5	1,950 reports or forms.	2,925
192(b)	Use Form MMS-143 to submit an initial damage report to the Regional Supervisor.	3	133 forms.	399
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 when information changes; date item returned to service must be in final report.	1	133 forms.	133
Subtotal			3,987 responses	6,159 hours
			\$137,760 non-hour cost burden	
Inspection of Operations				
130-133	Request reconsideration from issuance of an INC.	2	178 requests.	356
	Request waiver of 14-day response time.	1	274 waivers.	274
	Notify BOEMRE before returning to operations if shut-in.	1	698 notices.	698
133	Request reimbursement for food, quarters, and transportation provided to BOEMRE representatives (no requests received in many years; minimal burden).	1.5	15 requests.	23 (rounded)
Subtotal			1,165 responses	1,351 hours
Disqualification				
135 BOEMRE internal process	Submit PIP under BOEMRE implementing procedures for enforcement actions.	40	4 plans.	160
Subtotal			4 responses	160 hours
Special Types of Approval				
140	Request various oral approvals not specifically covered elsewhere in regulatory requirements.	1	360 requests.	360
140(c)	Submit letter when stopping approved flaring with required information.	Burden covered under 1010-0041.		0
141; 198	Request approval to use new or alternative procedures, including BAST not specifically covered elsewhere in regulatory requirements.	20	590 requests.	11,800
142; 198	Request approval of departure from operating requirements not specifically covered elsewhere in regulatory requirements.	2.5	1,052 requests.	2,630
Subtotal			2,002 responses	14,790 hours
Naming and Identifying Facilities and Wells (Does Not Include MODUs)				
150; 151; 152; 154(a)	Name and identify facilities, artificial islands, MODUs, helo landing facilities etc., with signs.	3	585 new/replace-ment signs.	1,755
150; 154(b)	Name and identify wells with signs.	2	188 new wells.	376
Subtotal			773 responses	2,131 hours
Right-of-use and Easement				

Citation 30 CFR 250 Subpart A and Related Forms/NTLs	Reporting or Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
		Non-Hour Cost Burdens		
160; 161; 123	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; include notifications.	9	26 applications.	234
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; 123	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; include pay.gov confirmation.	5	1 application.	5
		\$2,569 state lease fee x 1 = \$2,569		
166	State lessees: Furnish surety bond; additional security if required.	Burden covered under 30 CFR 256 (1010-0006).		0
Subtotal			27 responses	239 hours
			\$2,569 non-hour cost burden	
Suspensions				
168; 170; 171; 172; 174; 175; 177; 180(b), (d)	Request suspension of operation or production; submit schedule of work leading to commencement; supporting information; include pay.gov confirmation receipt.	10	595 requests	5,950
	Submit progress reports on SOO or SOP as condition of approval.	3	703 reports	2,109
		\$1,968 fee x 595 = \$1,170,960*		
172(b); 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 covered under 1010-0151.		0
Subtotal			1,299 responses	8,159 hours
			\$1,170,960 non-hour cost burden	
Primary Lease Requirements, Lease Term Extensions, and Lease Cancellations				
180(a), (h), (i),	Notify and submit report on various leaseholding operations and lease production activities.	2	53 reports or notices	106
180(f), (g), (h), (i)	Submit various operations and production data to demonstrate production in paying quantities to maintain lease beyond primary term; notify BOEMRE when you begin conducting operations beyond its primary term.	2	404 submissions/notifications	808
		.5		202
180(e), (j)	Request more than 180 days to resume operations; notify BOEMRE if operations do not begin within 180 days.	4	88 requests/notifications	352
		.5		44
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	1 request	20
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			547 responses	1,582 hours
Information and Reporting Requirements				
186; NTL	Submit information and reports as BOEMRE requires.	10	200	2,000

Citation 30 CFR 250 Subpart A and Related Forms/NTLs	Reporting or Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
		Non-Hour Cost Burdens		
187; 188(a-b); 189; 190(a-c); 192; NTL	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); include hurricane reports such as platform/rig evacuation, rig damage, P/L damage, and platform damage; operations personnel to muster for evacuation not related to weather or drills; any additional information required. If requested, submit copy marked as public information.	Oral .5	898	449
		Written 2.5	950	2,375
187(d)	Report all spills of oil or other liquid pollutants.	Burden covered under 30 CFR 254 (1010-0091).		0
188(a)(5)	Report to District Manager hydrogen sulfide (H2S) gas releases immediately by oral communication.	Burden covered under 1010-0141.		0
191	Submit written statement/Request compensation mileage and services for testimony re: accident investigation.	Exempt under 5 CFR 1320.4(a)(2), (c).		0
193	Report apparent violations or non-compliance.	1.5	6 reports	9
194; NTL	Request departures from conducting archaeological resources surveys and/or submitting reports in GOMR.	1	2 requests	2
194(c)	Report archaeological discoveries.	2	12 reports	24
195	Notify District Manager within 5 workdays of putting well in production status (usually oral). Follow-up with either fax/email within same 5 day period (burden includes oral and written).	1	188 notifications	188
196	Submit data/information for post-lease G&G activity and request reimbursement.	Burden covered under 30 CFR 251 (1010-0048).		0
197(c)	Submit confidentiality agreement.	1	1	1
101-199	General departure or alternative compliance requests not specifically covered elsewhere in Subpart A.	2	21 requests	42
Subtotal			2,278 responses	5,090 hours
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.	1.5	2,151 record-keepers	3,227 (rounded)
109(b); 113(c)	Retain welding plan and drawings of safe-welding areas at site; designated person advises in writing that it is safe to weld.	1	637 operations	637
132(b)(3)	During inspections make records available as requested by inspectors.	2	130 lessees/operators	260
Subtotal			2,918 responses	4,124 hours
TOTAL BURDEN			15,151 Responses	44,413 Hours
			\$1,311,289 Non-Hour Cost Burdens	

* Cost recovery monies collected are based on actual submittals through Pay.gov for FY 2009.

(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 \$80/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>.

Position	Level	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.4** x \$/hour)	Percent of time spent on collection	Weighted Average (\$/hour)
Secretaries and Administrative assistants	6	\$21	29	25%	\$7
Petroleum Engineers, Geologists	All workers	\$69	\$97	65%	\$63
Supv. Engineer	15	\$69	\$97	10%	\$10
Weighted Average (\$/hour)					\$80

* Note that this BLS source reflects their last update from December 2008.

** A multiplier of 1.4 (as implied by BLS news release USDL 10-0774, June 9, 2010, (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

Based on a cost factor of \$80 per hour, we estimate the total annual cost to industry is \$3,553,040 (\$80 x 44,413 hours = \$3,553,040).

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 respondents to pay a cost recovery 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 § 250.1015 and is subject to change based on that regulation. We estimate receiving only one application per year. Section 250.171 requests a cost recovery 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. We estimate a total reporting non-hour cost burden of \$1,311,289. Refer to the table in Section A.12 of this supporting statement for the specific non-hour paperwork cost burden 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 ¾ hour for each hour spent by the respondents for a total of 33,310 (rounded) hours.

The average government cost is \$61/hour. This cost is broken out in the below table using the current Office of Personnel Management salary data for the REST OF THE UNITED STATES (<http://www.opm.gov/oca/10tables/>).

Position	Grade	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.5* x \$/hour)	Percent of time spent on collection	Weighted Average (\$/hour)
Clerical	GS-5/5	\$17	\$26	4%	\$1
Technician(s)	GS-11/5	\$31	\$47	25%	\$12
Engineer(s)	GS-13/5	\$44	\$66	65%	\$43
Supervisory	GS-14/5	\$53	\$80	6%	\$5
Weighted Average (\$/hour)					\$61

*A multiplier of 1.5 (as implied by BLS news release USDL 09-1501, June 9, 2010 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

Based on a cost factor of \$61 per hour, the cost to the government would be \$2,031,910 (44,413 hours x 0.75 = 33,310 hours x \$61 = \$2,031,910).

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

The currently approved OMB paperwork burden is 36,739 burden hours for this collection of information. This submission requests 44,413 hours with both program increases as well as adjustment increases.

(a) The program increase of 2,001 hours is due to:

(i) the requirement for submitting a confidentiality agreement when required under § 250.197(c) was inadvertently not included in final rulemaking (71 FR 16033, March 30, 2006) (+1 burden hour);

(ii) we separated out the IC for § 250.186 to stand on its own, since we felt that the regulatory requirement did not only pertain to incident reporting requirements for a program increase (+2,000 burden hours).

(b) The adjustment increase of 5,673 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 burden is \$810,200 for this collection of information. This submission requests \$1,311,289. The net adjustment increase of \$501,089 is a result of re-estimating the number of annual responses that have associated cost recovery fees.

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 BOEMRE 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.

The BOEMRE will display the OMB approval number and OMB expiration date on Forms MMS-132, MMS-143, MMS-1123, and MMS-1832.

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.”