

Supporting Statement A

Measurement of Gas

OMB Control Number 1004-XXXX

Terms of Clearance: None. This is a new collection of information.

General Instructions

A completed Supporting Statement A 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 below. If an item is not applicable, provide a brief explanation. When the question “Does this ICR contain surveys, censuses, or employ statistical methods?” is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The Bureau of Land Management (BLM) is proposing a rule that would replace Onshore Oil and Gas Order Number 5, Measurement of Gas (Order 5) with new regulations that would be codified in the Code of Federal Regulations (CFR). The proposed rule includes provisions addressing the accurate measurement and proper reporting of all gas removed or sold from Federal and Indian leases, units, unit participating areas, and areas subject to communitization agreements, by providing a system for production accountability by operators, lessees, purchasers, and transporters.

The Secretary of the Interior has the authority under various Federal and Indian mineral leasing laws to manage oil and gas operations on Federal and Indian (except Osage Tribe) lands, including:

- The Mineral Leasing Act, 30 U.S.C. 181 et seq.;
- The Mineral Leasing Act for Acquired Lands, 30 U.S.C. 351 et seq.;
- The Indian Mineral Leasing Act, 25 U.S.C. 396a et seq.;
- The Act of March 3, 1909, 25 U.S.C. 396; and
- The Indian Mineral Development Act, 25 U.S.C. 2101 et seq.

- 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.**

All collections in this proposed rule would be new.

A. Documentation to be Reviewed by the PMT

Some of the information collection activities in the proposed rule would involve review of documentation by the BLM Production Measurement Team (PMT), made up of measurement experts from the BLM. The PMT would act as a central BLM advisory body for reviewing and approving devices and software not specifically addressed in the proposed regulations. The documentation would consist of test reports generated by a testing facility that compares the performance of hardware and software used or proposed for use at BLM Facility/Measurement Points (FMP) with reference standards maintained by the testing facility. The reports would also include descriptions of the test set-up and procedures, qualifications of the test facility, and uncertainty analyses. The documentation submitted to the PMT would assist the BLM in ensuring that the hardware and software used in gas measurement are in compliance with performance standards proposed in this rule.

Flow Conditioner Testing Report

Proposed section 3175.46 would provide for the listing of an approved make and model of isolating flow conditioner at www.blm.gov, and would provide a procedure for seeking approval of other makes and models. That procedure would involve preparing a report that would have to show the results of testing required by proposed section 3175.46. Upon review of the report, the PMT would make a recommendation to the BLM to approve use of the device, disapprove use of the device, or approve it with conditions for its use. The BLM would add any approved device to a list of approved flow conditioners at www.blm.gov. The burden of performing these tests and submitting the test reports to the BLM are shown in Table 12-2. The burden for the PMT and the BLM to review the data and post the device to the website is shown in Table 14-2.

These burdens are not included in the proposed rule's Economic Analysis because these burdens would be incurred only occasionally, when or if operators propose new flow conditioners for use at FMPs.

Differential Primary Devices Other than Flange-Tapped Orifice Plates

Proposed section 3175.47 would authorize operators to seek approval to use a particular make and model of a differential primary device (other than those one listed at www.blm.gov) by collecting all test data required under API 22.2 (incorporated by reference, see § 3175.31) and reporting it to the PMT. The PMT would review the test data to ensure that the primary device meets the relevant requirements and make a recommendation to the BLM to approve use of the

device, disapprove use of the device, or approve its use with conditions. The burden of performing these tests and submitting the test reports to the BLM are shown in Table 12-2. The burden for the PMT and the BLM to review the data and post the device to the website is shown in Table 14-2.

These burdens are not included in the proposed rule's Economic Analysis because these burdens would be incurred only occasionally, when or if operators propose new differential devices for use at FMPs.

Linear Measurement Device Testing Report

Proposed section 3175.48 would require submission of a report showing the results of each test required by the PMT. This report would be reviewed by the PMT, and would be a pre-requisite for BLM approval of a linear type of meter in lieu of an approved type of differential meter. This requirement would assist the BLM in ensuring that meters used in gas measurement are in compliance with performance standards. The burden of performing these tests and submitting the test reports to the BLM are shown in Table 12-2. The burden for the PMT and the BLM to review the data and post the device to the website is shown in Table 14-2.

These burdens are not included in the proposed rule's Economic Analysis because these burdens would be incurred only occasionally, when or if operators propose linear devices for use at FMPs.

Transducer Testing Report

Proposed section 3175.134 would require submission of a report showing the results of each test required by proposed sections 3175.131 through 3175.135, including all data points recorded. This report would be reviewed by the PMT, and would be a pre-requisite for BLM approval of a particular make and model of transducer for use in an electronic gas metering (EGM) system. This requirement would assist the BLM in ensuring that transducers used in gas measurement are in compliance with performance standards. The burden of performing these tests and submitting the test reports to the BLM are shown in Table 12-2. The burden for the PMT and the BLM to review the data and post the device to the website is shown in Table 14-2.

Flow-Computer and Software Version Testing Report

Proposed section 3175.144 would require submission of a report showing the results of each test required by proposed sections 3175.141 through 3175.143, including all data points recorded. This report would be reviewed by the PMT, and would be a pre-requisite for BLM approval of software for use in an EGM system. This requirement would assist the BLM in ensuring that software used in gas measurement is in compliance with performance standards. The burden of performing these tests and submitting the test reports to the BLM are shown in Table 12-2. The burden for the PMT and the BLM to review the data and post the device to the website is shown in Table 14-2.

B. Other Proposed Information Collection Activities

The information required in this section is needed to verify that gas removed or sold from Federal and Indian leases is accounted for, accurately measured, and properly reported for royalty determination purposes. The information collection activities under this section are, to some degree, already performed by industry in order to comply with gas sales contracts and industry standards. Proposed subpart 3175 would change the frequency at which some of these activities are performed, would require submission of reports to the BLM, and would specify the minimum amount of information that each report must contain.

Unless otherwise noted below, industry's burden for reporting the information to the BLM is included in the Paperwork Reduction Act analysis that the BLM prepared for proposed rule 43 CFR parts 3160 and 3170, Onshore Oil and Gas Operations; Federal and Indian Oil and Gas Leases; Site Security, which published in the Federal Register on July 13, 2015 (80 FR 40768). The reporting burdens, which are usually incurred during production audits, are listed in Supporting Statement A, Table 12-2, under "Records Submission Requirements." Therefore, some of the burdens shown in Table 12-2 in this Supporting Statement include only the burdens associated with collecting the required information.

Nearly all of the BLM's costs related to reviewing and analyzing data submitted under the information collection activities listed below are included in the Paperwork Reduction Act analysis that the BLM prepared for proposed rule 43 CFR parts 3160 and 3170, Onshore Oil and Gas Operations; Federal and Indian Oil and Gas Leases; Site Security (80 FR 40768, July 13, 2015). Usually the BLM would incur these costs during production audits and are listed in Supporting Statement A, Table 14-2, under "Records Submission Requirements." The only exception, noted below, is Retention of Test Equipment Recertification.

Orifice Plate Inspection Report

Proposed section 3175.80(e) would require operators to retain, and submit to the BLM upon request, usually during production audits, documentation for every orifice plate inspection and include that documentation as part of the verification report required at proposed section 3175.92(d) (where the operator uses mechanical recorders) or proposed section 3175.102(e) (where the operator uses EGM systems). Virtually all gas sales contracts involving orifice meters contain a provision requiring periodic removal and inspection of the orifice plate. For the purpose of this analysis, the BLM assumed that semi-annual inspections represent standard industry practice. Normally, operators include the documentation with the verification reports. Proposed section 3175.80(c) and (d) would generally increase the frequency at which operators must inspect orifice plates. The burdens shown in Table 12-2 represent the increase in burdens to collect and record the information that would be required in the proposed rule, compared to burdens currently assumed to be incurred by industry based on usual and customary practices.

The proposed rule would also add a new requirement that the documentation must include:

- The information required in proposed section 3170.7(g) (i.e., the FMP number and the name of the company that created the record);
- Plate orientation (bevel upstream or downstream);
- Measured orifice bore diameter;
- Confirmation that the plate condition complies with the applicable API standard;
- The presence of oil, grease, paraffin, scale, or other contaminants found on the plate;
- Time and date of inspection; and
- Whether or not the plate was replaced.

Meter-Tube Inspection Report

Proposed section 3175.80(j) would require operators to retain, and submit to the BLM upon request, documentation demonstrating that the meter tube complies with applicable API standards and showing completion of all required measurements. Upon request, the operator would also be required to provide the information required in proposed section 3170.7(g) (i.e., the FMP number and the name of the company that created the record). For the purpose of this analysis, the BLM assumed that this is not a customary and usual business practice, although some sales contracts do include a provision requiring periodic inspection of the meter tube. Therefore, the burdens in Table 12-2 represent the total burden of the inspections proposed in the rule.

Proposed section 3175.80(h) and (i) would establish the frequency at which operators must inspect meter tubes and would require the operator or purchaser to maintain documentation of the inspection and to submit the documentation of meter tube inspections to the BLM on request, usually during production audits.

The proposed rule does not specify a format for this documentation, but it would generally require the following information:

- The roughness of the inside surface of the meter tube;
- Any irregularities such as grooves, scoring, ridges, seams, or offsets;
- Presence of dirt, ice, grit, grease, oil, free liquid, or other extraneous material;
- Measurements of internal diameter;
- Verification that the inside diameter of the orifice meter matches the inside diameter of the meter tube, is aligned with the meter tube, and that any welds have been ground down; and
- Verification that the pressure tap holes meet industry standards.

Verification for Mechanical Recorders

Proposed section 3175.92(d) would require operators to retain, and submit to the BLM upon request, usually during production audits, documentation of each verification of a mechanical recorder. Virtually all gas sales contracts involving orifice meters contain a provision requiring

periodic verification of mechanical recorders. For the purpose of this analysis, the BLM assumed that quarterly verifications represent standard contract requirements. It is also standard industry practice to document the findings of those verifications and retain that documentation.

The proposed rule would reduce the verification frequency from what is typically required in sales contracts for those FMPs measuring less than 15 Mcf/day and would maintain the typical verification frequency for those FMPs measuring between 15 Mcf/day and 100 Mcf/day. Because the proposed rule would reduce or maintain what is considered usual and customary business practice, there would be no increased burden associated with the collection and maintenance of this information. In addition, any request by the BLM for the information retained in accordance with proposed section 3175.92(d) would be made under the authority of the proposed rule to which OMB has assigned control number 1004-0207. Therefore, no burdens are designated for this information collection activity in Table 12-2.

The proposed rule would require the following information to be included in the reports:

- The information required in proposed section 3170.7(g) (i.e., the FMP number and the name of the company that created the record);
- The time and date of the verification and the prior verification date;
- Primary-device data (meter-tube inside diameter and differential-device size and beta or area ratio);
- The type and location of taps (flange or pipe, upstream or downstream static tap);
- Atmospheric pressure used to offset the static-pressure pen, if applicable;
- Mechanical recorder data (make, model, and differential pressure, static pressure, and temperature element ranges);
- The normal operating points for differential pressure, static pressure, and flowing temperature;
- Verification points (as-found and applied) for each element;
- Verification points (as-left and applied) for each element, if a calibration was performed;
- Names, contact information, and affiliations of the person performing the verification and any witness, if applicable; and
- Remarks, if any.

Retention of Test Equipment Recertification On-Site

Proposed section 3175.92(g) would require operators to certify the test equipment used to verify or calibrate the static pressure, differential pressure, and temperature elements/transducers at an FMP at least every two years. Many gas sales contracts involving orifice meters contain a provision requiring recertification of test equipment used to verify both mechanical recorders and EGMs. For the purpose of this analysis, the BLM assumed that two-year certification represents standard contract requirements. It is also usual and customary industry practice to document the findings of those verifications and retain that documentation.

Because the burden of retaining this information on site would normally be part of a verification

inspection and not a production audit, the burden estimates in Table 12-2 only include the burden to retain this information on-site. Table 14-2 includes the burdens for the BLM to inspect the certification documentation on site, usually during the witnessing of a mechanical recorder or EGM verification. The documentation would require:

- Test equipment serial number, make, and model;
- The date on which the recertification took place;
- The test equipment measurement range; and
- The uncertainty determined or verified as part of the recertification.

Mechanical Recorder Integration Statement

Proposed section 3175.93 would require operators to retain and submit to the BLM upon request, usually during production audits, mechanical recorder integration statements. Operators that use mechanical chart recorders generate these statements during the normal course of business. This proposed rule would not require operators to generate any additional statements beyond what they generate now and there would be no additional burdens for operators to comply with this new requirement. Virtually all charts used in conjunction with mechanical recorders are sent to a third party integration service in order to determine how much gas volume is represented by that chart. The proposed rule sets standards for the equations that must be used in the integration process and for the information that the integration statement must contain. It clarifies and simplifies the format operators would follow when submitting the information during production audits. Operators, for the most part, already provide this information on their integration statements, or have easy access to it; therefore, there is no significant reporting burden as a result of this proposed requirement. Because there is no additional burden associated with this requirement, no burdens are assigned for this activity in Table 12-2.

Under the proposed rule, the integration statement must contain the following information:

- The information required in proposed section 3170.7(g) (i.e., the FMP number and the name of the company that created the record);
- The name of the company performing the integration;
- The month and year for which the integration statement applies;
- Meter-tube inside diameter (inches);
- Information of the primary device;
- Relative density (specific gravity);
- CO₂ content (mole percent);
- N₂ content (mole percent);
- Heating value calculated under section 3175.125 (Btu/standard cubic feet);
- Atmospheric pressure or elevation at the FMP;
- Pressure base;
- Temperature base;
- Static pressure tap location (upstream or downstream);
- Chart rotation (hours or days);

- Differential pressure bellows range (inches of water);
- Static pressure element range (psi); and
- For each chart or day integrated, the time and date on and time and date off, average differential pressure (inches of water), average static pressure, static pressure units of measure (psia or psig), average temperature (° F), integrator counts or extension, hours of flow, and volume (Mcf).

Routine Verification for EGMs

Proposed section 3175.102(e) would require operators to retain documentation of each verification of an EGM and submit it to the BLM upon request, usually during production audits. Virtually all gas sales contracts involving orifice meters contain a provision requiring periodic verification of EGMs. For the purpose of this analysis, the BLM assumed that quarterly verifications represent standard contract requirements. It is also usual and customary industry practice to document the findings of those verifications and retain that documentation.

The proposed rule would reduce the verification frequency from what is typically required in sales contracts for those FMPs measuring 100 Mcf/day or less, would maintain the typical verification frequency for those FMPs measuring between 100 Mcf/day and 1,000 Mcf/day, and would increase the typical verification frequency for those FMPs measuring more than 1,000 Mcf/day. The BLM estimates that only 1.3 percent of FMPs measure more than 1,000 Mcf/day.

Because the proposed rule would generally reduce or maintain what is considered usual and customary business practice, there would be no increased burden associated with the collection and maintenance of this information. Therefore, no burdens are assigned to this activity included in Table 12-2.

The proposed rule would specify the information that must be recorded and would include:

- The information required in proposed section 3170.7(g) (i.e., the FMP number and the name of the company that created the record);
- The time and date of the verification and the last verification date;
- Primary device data (meter-tube inside diameter and differential-device size, beta or area ratio);
- The type and location of taps (flange or pipe, upstream or downstream static tap);
- The flow computer make and model;
- The make and model number for each transducer, for component-type EGM systems;
- Transducer data (make, model, differential, static, temperature URL, and upper calibrated limit);
- The normal operating points for differential pressure, static pressure, and flowing temperature;
- Atmospheric pressure;
- Verification points (as-found and applied) for each transducer;

- Verification points (as-left and applied) for each transducer, if calibration was performed;
- The differential device inspection date and condition (e.g., clean, sharp edge, or surface condition);
- Verification of equipment make, model, range, accuracy, and last certification date;
- The name, contact information, and affiliation of the person performing the verification and any witness, if applicable; and
- Remarks, if any.

Redundancy Verification Check for EGMs

Proposed 43 CFR 3175.102(e)(2) would allow redundancy verification in lieu of routine verification. If an operator opts to use redundancy verification, the proposed rule would establish standards for the information that must be retained and submitted to the BLM on request, usually during production audits that would be conducted in accordance with the proposed rule for which OMB has assigned control number 1004-0207. The use of redundancy verification is not currently a common practice in the United States, and the BLM anticipates that it would only be used on 10 percent of FMPs classified as very-high volume. Table 12-2 shows the projected burden of collecting the information proposed in this rule.

These information requirements are based on industry standards (API 21.1). The following would be the required information for redundancy verification checks:

- The information required in proposed section 3170.7(g) (i.e., the FMP number and the name of the company that created the record);
- The month and year for which the redundancy check applies;
- The makes, models, upper range limits, and upper calibrated limits of the primary set of transducers;
- The makes, models, upper range limits, and upper calibrated limits of the check set of transducers;
- The information required in API 21.1, Annex I, which includes comparisons of volume, energy, differential pressure, static pressure, and temperature both in tabular form (average values) and graphical form (instantaneous values).
- The tolerance for differential pressure, static pressure, and temperature as calculated under proposed 43 CFR 3175.102(d)(2) of this section; and
- Whether or not each transducer required verification under paragraph (c) of this section.

Quantity Transaction Record

Proposed section 3175.104(a) would require operators to retain the original, unaltered, unprocessed, and unedited daily and hourly quantity transaction records (QTR) and submit them to the BLM upon request, usually during production audits that would be conducted in accordance with the proposed rule for which OMB has assigned control number 1004-0207. The generation and retention of this data is required by virtually all gas sales contracts involving

orifice plates and EGMs. It is also required by industry standards (API 21.1). The proposed rule would require the QTR to contain the information identified in API 21.1.5.2 (date and time identifier, quantity (volume, mass and/or energy), flow time, integral value/average extension, differential pressure average, static pressure average, temperature average, and relative density, energy content, composition, and/or density averages shall be included if they are live inputs), with the following additions and clarifications:

- The information required in proposed section 3170.7(g) (i.e., the FMP number and the name of the company that created the record);
- The volume, flow time, integral value or average extension, and the average differential pressure, static pressure, and temperature as calculated in proposed section 3175.103(c), reported to at least 5 significant digits; and
- A statement of whether the operator has submitted the integral value or average extension.

Many operators currently use a third-party software package to reduce the burden of reporting quantity transaction records to the BLM. The proposed rule would generally prohibit the use of third-party software packages, therefore the burdens in Table 12-2 also include the extra time to collect the raw data generated by the EGM system.

Configuration Log

Proposed 43 CFR 3175.104(b) would require operators to retain, and submit to the BLM upon request, usually during production audits, the original, unaltered, unprocessed, and unedited configuration log. The BLM would conduct production audits in accordance with the proposed rule to which OMB has assigned control number 1004-0207.

The generation and retention of this data is required by virtually all gas sales contracts involving orifice meters and EGMs. It is also required by industry standards (API 21.1). The proposed rule would require the configuration log to contain the information under API 21.1.5.4 (meter identifier, date and time collected, contract hour, atmospheric pressure for sites with gauge pressure transmitters, pressure base, temperature base, timestamp definition, calibrated or user defined span for differential pressure, no flow cutoff, calibrated or user defined span for static pressure, static pressure type [absolute or gauge], calibrated or user defined operating range for temperature or fixed temperature if not live, gas composition [if not live], relative density [if not live], compressibility [if not live], energy content [if not live], meter tube reference inside diameter, meter tube material, meter tube reference temperature, meter tube static pressure tap location [upstream/downstream], orifice plate reference bore size, orifice plate material, orifice plate reference temperature, discharge coefficient calculation method/reference, gas expansion factor method/reference, compressibility calculation method/reference, quantity calculation period, sampling rate, variables included in the integral value, base compressibility of air, absolute viscosity [cP], ratio of specific heats, meter elevation or contract value of atmospheric pressure, other factors used to determine flow rate, alarm set points [differential pressure low, differential pressure high, static pressure low, static pressure high, flowing temperature low,

flowing temperature high]. For primary devices other than an orifice plate, the primary device type, material, reference temperature, size, Beta/area ratio, discharge coefficient, and factors necessary to calculate discharge coefficient), with the following additions and clarifications:

- The information required in proposed section 3170.7(g) (i.e., the FMP number and the name of the company that created the record);
- Software/firmware identifiers that comply with applicable API standards;
- The fixed temperature, if not live (°F);
- The static-pressure tap location (upstream or downstream); and
- The flow computer snapshot report in API 21.1.5.4.2 and API 21.1, Annex G.

The burdens in Table 12-2 include the burden to operators to provide the additional information proposed in this rule for those configuration logs that the BLM requests during a production audit. In addition, many operators currently use a third-party software package to reduce the burden of reporting quantity transaction records to the BLM. The proposed rule would generally prohibit the use of third-party software packages, therefore the burdens in Table 12-2 also include the extra time to collect the raw data generated by the EGM system.

Event Log

Proposed section 3175.104(c) would require operators to retain the original, unaltered, unprocessed, and unedited event log and submit it to the BLM upon request, usually during production audits. The collection and retention of this data is required by virtually all gas sales contracts involving orifice meters and EGMs. It is also required by industry standards (API 21.1), and would not impose any additional burdens on operators. The proposed rule would require the event log to contain the information required in API 21.1.5.5 (the chronological listing of the date and time of any change to a constant flow parameter that can affect the quantity transaction record, along with the old and new value), with the following additions and clarifications:

- The event log must record all power outages (including the length of the outage) that inhibit the meter's ability to collect and store new data; and
- The event log must have sufficient capacity and must be retrieved and stored at intervals frequent enough to maintain a continuous record of events as required under proposed section 3170.7, or the life of the FMP, whichever is shorter.

The BLM believes that the additional requirements proposed in this rule would not impose any significant burden for operators over usual and customary business practice; therefore, no burdens are included for this activity in Table 12-2.

Gas Chromatograph Verification

Proposed 3175.117(c) and (d) would require operators to retain the manufacturer's specifications and installation and operational recommendations for on-line gas chromatographs, and the

results of all verifications of on-line gas chromatographs and submit the information to the BLM upon request, usually during production audits. The collection and retention of the verification of on-line gas chromatographs is required by most gas sales contracts involving the use of on-line gas chromatographs, is required by industry standards (Gas Processer's Association standard 2261-00), and would not impose any additional burdens on operators. Therefore, no burdens are included for this activity in Table 12-2.

The proposed rule (3175.118(i)) would require the gas chromatograph verification to contain:

- The components analyzed;
- The response factor for each component;
- The peak area for each component;
- The mole percent of each component as determined by the GC;
- The mole percent of each component in the gas used for verification;
- The difference between the mole percents determined in paragraphs (i)(4) and (i)(5) of this section, expressed in relative percent;
- Documentation that the gas used for verification meets the requirements of GPA 2198-03 (incorporated by reference, see § 3175.31), including a unique identification number of the calibration gas used and the name of the supplier of the calibration gas;
- The time and date the verification was performed; and
- The name and affiliation of the person performing the verification.

Gas Analysis Report

Proposed section 3175.120 would list information that operators would be required to include in gas analysis reports. This information would be required to be entered into the BLM GARVS database within 5 days of the due date for the sample as specified in proposed section 3175.115. Paragraph (a) would provide that, unless otherwise required under paragraph (b), spot samples for all FMPs would be required to be taken and analyzed at the frequency specified at Table 4 of proposed section 3175.110.

Paragraph (b) would provide that the BLM could change the required sampling frequency for high-volume and very-high-volume FMPs if the BLM determines that the sampling frequency required in Table 4 is not sufficient to achieve the heating value certainty levels required in proposed section 3175.30(b). Table 5 at paragraph (c) would limit the amount of time that would be allowed between any 2 samples.

Virtually all gas sales contracts require gas samples to be taken at least annually and have that sample analyzed to determine the molecular components in that gas. Heating value and relative density are calculated from the gas composition. The proposed rule would set the minimum required frequency for obtaining gas samples, would establish standards for obtaining and analyzing gas samples, and would establish standards for reporting the heating value. Table 12-2 includes the burdens of the proposed increase in sampling frequency over the usual and customary annual sampling frequency and the burdens of entering all gas analyses into the BLM

database. Table 12-2 also includes the burdens of performing extended analyses for those samples containing more than 0.25 mole-percent of hexane+ and for providing heat tracing during the sampling process. The BLM believes that the cost of cleaning the sample cylinders prior to taking a sample is a usual and customary expense and, therefore, is not included in Table 12-2. The BLM would usually analyze the reports during production audits.

There would also be some non-hour cost burden for those high- and very-high volume FMPs where the heating value uncertainty standards proposed in 3175.30(b) cannot be met with spot sampling. In these instances, the operator would have to purchase and install a composite sampling system or an on-line gas chromatograph. Because both methods could achieve the proposed uncertainty standards and composite sampling systems are much less expensive than on-line gas chromatographs, the non-hour cost burden in Table 12-2 assumes operators would install composite sampling systems.

Proposed 3175.120 would require gas analysis reports to contain the following information:

- The information required in proposed section 3170.7(g) (i.e., the FMP number and the name of the company that created the record);
- The date and time that the sample for spot samples was taken or, for composite samples, the date the cylinder was installed and the date the cylinder was removed;
- The date and time of the analysis;
- For spot samples, the effective date, if other than the date of sampling;
- For composite samples, the effective start and end date;
- The name of the laboratory where the analysis was performed;
- The device used for analysis (i.e., GC, calorimeter, or mass spectrometer);
- The make and model of analyzer;
- The date of last calibration or verification of the analyzer;
- The flowing temperature at the time of sampling;
- The flowing pressure at the time of sampling, including units of measure (psia or psig);
- The flow rate at the time of the sampling;
- The ambient air temperature at the time the sample was taken;
- Whether or not heat trace or any other method of heating was used;
- The type of sample (i.e., spot-cylinder, spot-portable GC, composite);
- The sampling method if spot-cylinder (e.g., fill and empty, helium pop);
- A list of the components of the gas tested;
- The un-normalized mole percentages of the components tested, including a summation of those mole percents;
- The normalized mole percent of each component tested, including a summation of those mole percents;
- The ideal heating value (Btu/scf);
- The real heating value (Btu/scf), dry basis;
- The pressure base and temperature base;
- The relative density; and
- The name of the company obtaining the gas sample.

Components that are listed on the analysis report, but not tested, would be required to be annotated as such.

Quantity Transaction Record Edits

Proposed section 3175.126(c)(2) would require operators to identify and verifiably justify all values on daily and hourly QTRs that have been changed or edited as a result of measurement errors stemming from an equipment malfunction causing discrepancies in the calculated volume or heating value of the gas. The documentation would be submitted to the BLM on request, usually during production audits. The retention of QTR edits is required by most gas sales contracts and would not impose an additional burden on operators. Therefore, no burdens are included for this activity in Table 12-2.

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.

Flow Conditioner Testing Report: Generated by the testing facility and submitted to the BLM through mail or email.

Differential primary devices other than flange-tapped orifice plates; API 22.2 report: Generated by the testing facility and submitted to the BLM through mail or email.

Linear measurement device testing report: Generated by the testing facility and submitted to the BLM through mail or email.

Transducer testing report: Generated by the testing facility and submitted to the BLM through mail or email.

Flow-computer and software testing report: Generated by the testing facility and submitted to the BLM through mail or email.

Orifice plate inspection report: Filled out by hand or key-entered into a computer and submitted (in accordance with the proposed rule to which OMB has assigned control number 1004-0207) to the BLM through email or regular mail.

Meter-tube inspection report: Filled out by hand or key-entered into a computer and submitted (in accordance with the proposed rule to which OMB has assigned control number 1004-0207) to the BLM through email or regular mail.

Verification for mechanical recorders: Generally filled out by hand and submitted to the BLM by email or regular mail.

Retention of test equipment recertification on-site: The report would be generated by a testing facility and a hard copy would generally be shown to the BLM on-site.

Mechanical recorder integration statement: Typically, these are generated using a combination of a mechanical planimeter and software that records the output of the planimeter. The statements would be submitted to the BLM either through email or regular mail.

Routine verification for EGMs: Either filled out by hand or automatically generated by the EGM software. They would be submitted to the BLM either through email or regular mail.

Redundancy verification checks for EGMs: Typically, these would be generated automatically through the EGM software and submitted (in accordance with the proposed rule to which OMB has assigned control number 1004-0207) to the BLM through email or regular mail.

Quantity transaction record: Generated automatically by the EGM software and would be submitted to the BLM either through email or regular mail.

Configuration log: Generated automatically by the EGM software and would be submitted (in accordance with the proposed rule to which OMB has assigned control number 1004-0207) to the BLM either through email or regular mail.

Event log: Generated automatically by the EGM software and would be submitted to the BLM either through email or regular mail.

Gas chromatograph verification: Generated manually or through an automated system. They would be submitted to the BLM through email or regular mail.

Gas analysis report: Proposed section 3175.120(f) would require operators to submit all gas analysis reports electronically using the BLM's Gas Analysis Reporting and Verifications System (GARVS) that the BLM is developing. The GARVS would be implemented before the effective date of the final rule. Operators would be required to submit all gas analyses electronically unless a variance is granted to allow paper submission. The variance would only be granted in extreme cases where the operator could demonstrate that it is a small business, as defined by the U.S. Small Business Administration, and does not have access to the Internet.

Quantity transaction record edits: Manual corrections to records generated automatically by EGM software that would be submitted to the BLM either through email or regular mail.

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 in the information that would be collected. The information that would be collected under the proposed rule is unique to each respondent and lease and would not be available from any other data source. No similar information is available or able to be modified.

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

A preponderance of firms involved in developing oil and gas resources are small entities as defined by the Small Business Administration. All respondents, regardless of size, would be required to comply with the proposed information collection requirements. The information we would require from all respondents is limited to the minimum necessary to authorize and regulate gas measurement activities.

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, or collected it less frequently, oil and gas operations could not occur on Federal or Indian trust leases in compliance with pertinent statutes. In addition, the BLM would not be able to ensure that gas removed or sold from Federal and Indian leases was accurately measured and properly reported for royalty determination purposes.

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.**

Proposed sections 3175.115 and 3175.120 would require submission of gas analysis reports to the BLM from spot samples taken at high- and very-high-volume FMPs at least every 3 months and every month, respectively, unless the BLM determines that more frequent analysis is required under section 3175.115(c).

There are several information collection activities that would require a response in fewer than 30 days upon receipt of the request:

- The reporting of gas analyses for all FMPs would be required within 5 days of receiving that analysis.
- The request for audit information generally requires a response within 2 weeks.
- An operator would have to produce proof of test equipment recertification immediately when a BLM inspector is present to witness the verification of a mechanical record or EGM system.

- 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.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three 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 preamble to the proposed rule solicits public comments on the information collection.

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

We would not provide payments or gifts to the respondents.

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

The proposed rule would provide no assurance of confidentiality to respondents.

- 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 would not require respondents to answer 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.

The frequency of response for each of the information collections is “on occasion,” with the following exception:

Proposed section 3175.120 would require submission of gas analysis reports to the BLM within 5 days of the following due dates for the sample as specified in proposed section 3175.115:

- (a) Gas samples at low-volume FMPs would be required least every 6 months;
- (b) Gas samples at marginal-volume FMPs would be required at least annually; and
- (c) Spot samples at high- and very-high-volume FMPs would be required at least every 3 months and every month, respectively, unless the BLM determines that more frequent analysis is required under section 3175.115(c).

The following table shows the BLM’s estimate of the hourly cost burdens for respondents. The mean hourly wages were determined using national Bureau of Labor Statistics data at: http://www.bls.gov/oes/current/oes_nat.htm. The benefits multiplier of 1.4 is supported by information at <http://www.bls.gov/news.r/ecec.nr0.htm>.

**Table 12-1
Estimated Weighted Average Hourly Costs**

A. Position	B. Mean Hourly Pay Rate	C. Hourly Rate with Benefits (Column B x 1.4)	D. Percent of Collection Time	E. Weighted Average Hourly Cost (Column C x Column D)
General Office Clerk (43-9061)	\$14.82	\$20.75	10%	\$2.08

A. Position	B. Mean Hourly Pay Rate	C. Hourly Rate with Benefits (Column B x 1.4)	D. Percent of Collection Time	E. Weighted Average Hourly Cost (Column C x Column D)
Engineer (17-2199)	\$46.32	\$64.85	80%	\$51.88
Engineering Manager (11-9041)	\$66.69	\$93.37	10%	\$9.34
Totals			100%	\$63.30

Hour and cost burdens to respondents include time spent for researching, preparing, and submitting information. The weighted average hourly wage associated with these information collections is shown at Table 12-1, above.

Table 12-2 itemizes the estimated hour and cost burdens for the proposed information collection activities.

Table 12-2
Estimates of Hour and Cost Burdens for Proposed Information Collection Activities

A. Type of Response	B. Number of Responses	C. Hours Per Response	D. Total Hours	E. Total Wage Cost (Column D x \$63.30)
Flow Conditioner Testing Report (43 CFR 3175.46)	1	400	400	\$25,320 ¹
Differential Primary Devices Other than Flange-Tapped Orifice Plates Report (43 CFR 3175.47)	1	400	400	\$25,320 ¹
Linear Measurement Device Testing Report (43 CFR 3175.48)	1	200	200	\$12,660 ¹
Verification for Mechanical Recorders (43 CFR 3175.92(d)) <i>Usual and customary, within the meaning of 5 CFR 1320.3(b)(2)</i>	0	0	0	0

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¹This cost includes work performed by independent testing facilities.

A. Type of Response	B. Number of Responses	C. Hours Per Response	D. Total Hours	E. Total Wage Cost (Column D x \$63.30)
Mechanical Recorder Integration Statement (43 CFR 3175.93) <i>Usual and customary, within the meaning of 5 CFR 1320.3(b)(2)</i>	0	0	0	0
Routine Verification for EGMs (43 CFR 3175.102(e)) <i>Usual and customary, within the meaning of 5 CFR 1320.3(b)(2)</i>	0	0	0	0
Event Log (43 CFR 3175.104(c)) <i>Usual and customary, within the meaning of 5 CFR 1320.3(b)(2)</i>	0	0	0	0
Transducer Testing Report (43 CFR 3175.134)	20	395	7,900	\$500,070 ¹
Flow-Computer and Software Version Testing Report (43 CFR 3175.144)	20	395	7,900	\$500,070 ¹
Orifice Plate Inspection Report (43 CFR 3175.80(e)) <i>Recordkeeping requirement</i>	28,436	1	28,436	\$1,799,999
Meter-Tube Inspection Report (43 CFR 3175.80(j)) <i>Recordkeeping requirement</i>	16,160	4.35	70,296	\$4,449,737
Retention of Test Equipment Recertification On-Site (43 CFR 3175.92(g))	2,000	0.1	200	\$12,600
Redundancy Verification Check for EGMs (43 CFR 3175.102(e)(2)) <i>Recordkeeping requirement</i>	1,000	0.5	500	\$31,650
Quantity Transaction Record (43 CFR 3175.104(a)) <i>Recordkeeping requirement</i>	3,185	3	9,555	\$604,831

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A. Type of Response	B. Number of Responses	C. Hours Per Response	D. Total Hours	E. Total Wage Cost (Column D x \$63.30)
Configuration Log (43 CFR 3175.104(b)) <i>Recordkeeping requirement</i>	3,185	3	9,555	\$604,831
Gas Analysis Report (43 CFR 3175.120)	219,199	1.53	335,374	\$21,229,204
Quantity Transaction Record Edits (43 CFR 3175.126(c)(2)) <i>Usual and customary, within the meaning of 5 CFR 3120.3(b)(2)</i>	0	0	0	0
Totals	273,208		470,716	\$29,796,292

The information collection activities that appear in the above table with the notation, “Usual and customary, within the meaning of 5 CFR 1320.3(b)(2)” are standard industry practices and will not result in collection burdens for industry in addition to those incurred in the ordinary course of their business. For reasons documented in the descriptions of the proposed information collection requirements, the BLM believes the burdens of these proposals are exempt from the PRA in accordance with 5 CFR 1320.3(b)(2). That is why no burdens are indicated for those activities.

The information collection activities that appear in the above table with the notation, “Recordkeeping requirement” are included in this PRA analysis because this proposed rule would require respondents to collect and retain certain information. However, any requirement to submit the information to the BLM (usually during a production audit) would be in accordance with the BLM’s proposed rule on site security, which was published on July 13, 2015 (80 FR 40768). OMB has assigned control number 1004-0207 to that proposed rule, but has not yet authorized the BLM to begin collecting information under that control number.

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 already reflected in item 12.)

- * 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 for form processing). 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.**

No filing fees are associated with the proposed rule.

There are some non-hour cost burdens associated with the proposed rule that are listed below:

1. To ensure the gas analysis report is accurate, the BLM estimates that operators of approximately 790 high-volume and very-high-volume FMPs would have to install composite sampling systems or on-line gas chromatographs in order to meet the heating value uncertainty requirements proposed in the rule. This would have a total cost of about \$3.69 million;
2. Also to ensure the gas analysis report is accurate, the proposed rule would require design and placement standards for gas sampling probes that would cost approximately \$8.81 million;
3. In order to provide volumes on the quantity transaction record (QTR) that would meet the stricter uncertainty requirements proposed in the rule, operators would have to replace some orifice plates and transducers at very high-volume FMPs for a cost of about \$100,000;
4. In order to provide volumes on the QTR that would meet the uncertainty standards in the proposed rule, mechanical recorders at high- and very high-volume FMPs would have to be replaced with EGM systems for a cost of \$5.20 million;
5. In order to provide volumes on the QTR that would meet the uncertainty standards in the proposed rule, a number of modifications to meter tubes and thermometer wells would have to be made at a cost of \$9.50 million;
6. In order for the BLM to verify the volumes reported on the QTR, the proposed rule would require on-site data at mechanical recorders that would cost about \$270,000;
7. In order to provide volumes on the QTR that would meet the uncertainty standards in the proposed rule, numerous manifolds and gauge lines would have to be modified under the proposed rule at a cost of \$670,000;

8. In order for the BLM to verify the volumes reported on the QTR, new requirements for the verification of EGM systems proposed in the new rule would cost \$210,000; and,
9. In order for the BLM to verify the volumes reported on the QTR, new calculation and audit trail requirements for EGM systems would be implemented under the proposed rule would at a cost \$3.47 million.

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.

The following table shows the BLM’s estimate of the hourly cost burdens to the Federal government. The hourly cost to the Federal Government is based on the U.S. Office of Personnel Management Salary Table 2015-RUS at http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/15Tables/html/RUS_h.aspx. The benefits multiplier of 1.5 is implied by information at <http://www.bls.gov/news.release/ecec.nr0.htm>.

**Table 14-1
Estimated Federal Hourly Cost**

A. Position	B. Pay Grade	C. Hourly Pay Rate (\$/hour)	D. Hourly Rate with Benefits (Column C x 1.5)	E. Percent of the Information Collection Completed by Each Occupation	F. Weighted Avg. (\$/hour) (Column D x Column E)
Clerical	GS-5, step 5	\$17.35	\$26.03	10%	\$2.60
Professional	GS-9, step 5	\$26.28	\$39.42	80%	\$31.54
Managerial	GS-13, step 5	\$45.33	\$68.00	10%	\$6.80
Weighted Average Hourly Pay Rate (\$/hour): \$40.94					

Please note that the recordkeeping requirements listed in Table 12-2 would be subject to subsequent audit procedures in accordance with the proposed rule for site security that was published on July 13, 2015 (80 FR 40767). In addition, please note that the requirements labeled as usual and customary in Table 12-2 are exempt from analysis of burdens under 5 CFR 1320.3(b)(2). Table 14-2, below, shows the estimated Federal hours and costs for the collection activities that would be processed in accordance with this proposed rule, and that are subject to

analysis of burdens under OMB regulations.

**Table 14-2
Estimated Annual Cost to the Government**

A. Type of Response	B. Number of Responses	C. Hours per Response	D. Total Hours (Column B x Column C)	E. Total Wage Cost (Column D x \$40.94)
Flow Conditioner Testing Report (43 CFR 3175.46)	1	40	40	\$1,638
Differential Primary Devices Other than Flange-Tapped Orifice Plates (43 CFR 3175.47)	1	40	40	\$1,638
Linear Measurement Device Testing Report (43 CFR 3175.48)	1	40	40	\$1,638
Transducer Testing Report (43 CFR 3175.134)	20	20	400	\$16,376
Flow-Computer and Software Version Testing Report (43 CFR 3175.144)	20	20	400	\$16,376
Retention of Test Equipment Recertification On-Site (43 CFR 3175.92(g))	2,000	0.1	200	\$12,660
Totals	2,0434		1,120	\$50,326

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

The proposed rule would result in program changes that are necessary to authorize and regulate gas measurement information collection activities.

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 BLM would not publish the results of this 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.

The BLM would display the expiration date of the OMB approval.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.