

**Supporting Statement for Paperwork Reduction Act Submissions**  
**30 CFR 250, Subpart I, Platforms and Structures**  
**OMB Control Number 1010-0149**  
**Current Expiration Date: June 30, 2011**

**Terms of Clearance:** Upon approval of this Information Collection Request (ICR), please discontinue OMB control number 1010-0168.

**Response:** The Office of Management and Budget (OMB) approved the request for discontinuation, July 31, 2009, with a Notice of Action.

### **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. 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.***

The Outer Continental Shelf (OCS) Lands Act, as amended (43 U.S.C. 1331 *et seq.* and 43 U.S.C. 1801 *et seq.*), authorizes the Secretary of the Interior (Secretary) to prescribe rules and regulations to manage the mineral resources of the OCS. Such rules and regulations 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 43 U.S.C. 1356 requires the issuance of ". . . regulations which require that any vessel, rig, platform, or other vehicle or structure . . . (2) which is used for activities pursuant to this subchapter, comply . . . with such minimum standards of design, construction, alteration, and repair as the Secretary . . . establishes . . . ." Section 43 U.S.C. 1332(6) also states "operations in the [O]uter Continental Shelf should be conducted in a safe manner . . . to prevent or minimize the likelihood of . . . physical obstruction to other users of the water or subsoil and seabed, or other occurrences which may cause damage to the environment or to property, or endanger life or health."

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, the Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE) is required to charge fees for services that provide special benefits or privileges to an

identifiable non-Federal recipient above and beyond those that accrue to the public at large. Platform applications are subject to cost recovery, and BOEMRE regulations specify service fees for these requests.

These authorities and responsibilities are among those delegated to BOEMRE to ensure that operations in the OCS will meet statutory requirements; provide for safety and protection of the environment; and result in diligent exploration, development, and production of OCS leases. This ICR addresses the regulations at 30 CFR 250, Subpart I, Platforms and Structures, and the associated supplementary notices to lessees and operators (NTLs) intended to provide clarification, description, or explanation of these regulations.

It should be noted that over the past several months various regulations and/or NTLs regarding safety and operations on the OCS have been initiated as a result of investigations, recommendations, and reports on the Deepwater Horizon event. None of the safety measures put into effect via these revised and/or new documents have affected this ICR or the regulations requiring this collection of information at the time of this submission.

***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.***

BOEMRE uses the information submitted under Subpart I to determine the structural integrity of all OCS platforms and floating production facilities and to ensure that such integrity will be maintained throughout the useful life of these structures. We use the information to ascertain, on a case-by-case basis, that the fixed and floating platforms and structures are structurally sound and safe for their intended use to ensure safety of personnel and prevent pollution. More specifically, we use the information to:

- Review data concerning damage to a platform to assess the adequacy of proposed repairs.
- Review applications for platform construction (construction is divided into three phases—design, fabrication, and installation) to ensure the structural integrity of the platform.
- Review verification plans and third-party reports for unique platforms to ensure that all nonstandard situations are given proper consideration during the platform design, fabrication, and installation.
- Review platform design, fabrication, and installation records to ensure that the platform is constructed according to approved applications.
- Review inspection reports to ensure that platform integrity is maintained for the life of the platform.

***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.***

Currently, 90 percent of all information is submitted electronically in GOMR. The Pacific Region does not collect information electronically.

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

The Department of the Interior has several Memoranda of Understanding (MOU) with other Federal agencies that define the responsibilities of each with respect to activities in the OCS. These MOU are effective in avoiding duplication of regulations and reporting requirements. In most cases, the information collected is unique and site specific to each platform or structure. It is not available from other sources.

**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 a significant economic effect on a substantial number of small entities. Any direct effects primarily impact the OCS lessees and operators. Approximately 70 percent of the OCS lessees and operators have less than 500 employees and are considered small businesses as defined by the Small Business Administration. The hour burden on any small entity subject to these regulations cannot be reduced to accommodate them without sacrificing safe operations and pollution prevention.

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

If we did not collect the information, BOEMRE could not carry out the mandate of the OCS Lands Act to determine if fixed and floating platforms and structures are structurally sound and safe. Inspection information is collected annually. Less frequent collection will not permit us to monitor the integrity of platforms and structures. Design and reassessment information is only collected once or as changing conditions necessitate. Respondents generally submit reports as a result of situations encountered and not at any fixed or prescribed interval. Therefore, frequency 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.**

For any other information not mentioned in A.6, respondents generally submit reports as a result of situations encountered and not at any fixed or prescribed interval.

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

Not applicable in this collection.

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

The Platform Approval Program requires that respondents submit one complete copy and three abbreviated copies of the environmental and structural information if the facility is subject to the Platform Verification Program. The complete copy is reviewed and retained by the Office of Structural and Technical Support (OSTS) special platform verification file. Of the three abbreviated copies, one is

sent to the appropriate District Office for their review and comment; one is retained by OSTs in a platform file; and the last one is sent to the official lease file.

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

The regulations in Subpart I require lessees to “. . . compile, retain, and make available . . . for the functional life of all platforms, the as-built structural drawings, the design assumptions and analyses, a summary of the nondestructive examination records, and the inspection results from platform inspections . . . .” The OCS Lands Act requires the Secretary to issue regulations on the minimum standards of design, construction, alteration, and repair of structures in the OCS. Retaining this information for the “functional life of all platforms” is critical as the history of a structure has a substantial effect on determining its current safety, probable strength, and integrity. As platforms and structures age, we must have access to the initial structural properties and inspection results to determine whether necessary standards for safety are maintained. The type of information collected is such that it is not unreasonable to expect that respondents would retain it as usual and customary business practice, even if not required in regulations.

***(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.***

Not applicable in this collection.

***(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; or***

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.***

***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 November 9, 2010 (75 FR 68814). Also, 30 CFR 250.199 and the Paperwork Reduction Act explain that 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 one comment in response to the Federal Register notice or unsolicited comments from respondents covered under these regulations. The comment received was from another government agency and it did not affect the paperwork burden, but was in support of the collection of such information.

During the comment period, BOEMRE requested input from several respondents on the input 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:

ANKOR Energy, LLC, Deborah R. Malbrough, Regulatory Manager,  
(504) 596-3688, 1615 Poydras Street, Suite 1100, New Orleans, LA 70112

Chevron U.S.A., Inc., Edward J. Welsch, Facilities Engineer – Structural,  
(985) 773-6385, 100 Northpark Blvd., Room N3290B, Covington, LA 70433

Dynamic Offshore Resources, Annalisa Taylor, Regulatory Manager,  
(713) 423-8053, 1301 McKinney Street, Suite 900, Houston, TX 77010

ExxonMobil Production Company, Wil Porche, Sr. Regulatory Specialist,  
(281) 654-1004, P.O. Box 4358, Houston, TX 77210-4358

Plains Exploration & Production Company, Thomas B. Goeres, Operations Manager,  
(805) 934-8221, 201 S. Broadway, Orcutt, CA 93455-4606

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

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

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

BOEMRE will protect information considered proprietary under the Freedom of Information Act (5 U.S.C. 552) and its implementing regulations (43 CFR 2), 30 CFR 250.197, “Data and information to be made available to the public or for limited inspection,” and 30 CFR Part 252, “Outer Continental Shelf (OCS) Oil and Gas Information Program.”

***11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the***

*specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.*

The collection does not include sensitive or private questions.

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

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

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

Potential respondents include Federal oil and gas OCS lessees and their Certified Verification Agents and/or other third-party reviewers of production facilities. 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. The frequency of responses submitted is usually on occasion, as a result of situations encountered, and are mandatory or required to obtain or retain a benefit. We estimate the total annual burden is 116,341 reporting and recordkeeping hours. Refer to the chart for a breakdown of the burden.

**BURDEN BREAKDOWN**

Citation 30 CFR 250 Subpart I and related NTLs	Reporting and/or Recordkeeping Requirement	Hour Burden	Average No. of Annual Reponses	Annual Burden Hours
		Non-Hour Cost Burdens*		
<b>General Requirements for Platforms</b>				
900(b), (c), (e); 905; 906; 910(c), (d); 911(c), (g); 912; 913; 919; NTL(s)	Submit application, along with reports/surveys and relevant data, to install new platform or floating production facility or significant changes to approved applications, including use of alternative codes, rules, or standards; CVA changes; and Platform Verification Program (PVP) plan for design, fabrication and installation of new, fixed, bottom-founded, pile-supported, or concrete-gravity platforms and new floating platforms. Consult as required with BOEMRE and/or USCG. Re/Submit application for major modification(s)/repairs to any platform; and related requirements.	102	105 applications	10,710
		\$21,075 x 1 PVP = \$21,075		
		\$3,018 x 15 fixed structure = \$45,270		
		\$1,536 x 27 Caisson/Well Protector = \$41,472		
		\$3,601 x 62 modifications/repairs = \$223,262		
900(b)(4)	Submit application for approval to convert an existing platform to a new purpose.	60	5 applications	300
900(b)(5)	Submit application for conversion of the use of an existing mobile offshore drilling unit.	120	2 applications	240
900(c)	Notify BOEMRE within 24 hours of damage and	4	12 notices/ requests;	48

Citation 30 CFR 250 Subpart I and related NTLs	Reporting and/or Recordkeeping Requirement	Hour Burden	Average No. of Annual Reponses	Annual Burden Hours
		Non-Hour Cost Burdens*		
	emergency repairs and request approval of repairs. Submit written completion report within 1 week upon completion of repairs.	20	reports	240
900(e)	Submit platform installation date and the final as-built location data to the Regional Supervisor within 45 days after platform installation.	20	140 submittals	2,800
900(e)	Resubmit an application for approval to install a platform if it was not installed within 1 year after approval (or other date specified by BOEMRE).	50	5 applications	250
903	Record original and relevant material test results of all primary structural materials; retain records during all stages of construction. Compile, retain, and provide location/make available to BOEMRE for the functional life of platform, the as-built drawings, design assumptions/analyses, summary of nondestructive examination records, inspection results, and records of repair not covered elsewhere.	160	130 lessees	20,800
903(c); 905(k)	Submit certification statement [a certification statement is not considered information collection under 5 CFR 1320.3(h)(1); the burden is for the insertion of the location of the records on the statement and the submittal to BOEMRE].	This statement is submitted with the application.		0
905(i)	Provide a summary of safety factors utilized in the design of the platform.	.25	331 summaries	83 (rounded)
<b>Subtotal</b>			<b>730 responses</b>	<b>35,471 hours</b>
			<b>\$331,079 non-hour cost burdens</b>	
<b>Platform Verification Program</b>				
911(c-e); 912(a-c); 914;	Submit complete schedule of all phases of design, fabrication, and installation with required information; also submit Gantt Chart with required information and required nomination/documentation for CVA.	130	5 schedules	650
912(a)	Submit design verification plans with your DPP or DOCD.	Burden covered under 1010-0151.		0
913(a)	Resubmit a changed design, fabrication, or installation verification plan for approval.	60	2 plans	120
916(c)	Submit interim and final CVA reports and recommendations on design phase.	250	10 reports	2,500
917(a), (c)	Submit interim and final CVA reports and recommendations on fabrication phase, including notices to BOEMRE and operator/lessee of fabrication procedure changes or design specification modifications.	150	10 reports	1,500
918(c)	Submit interim and final CVA reports and recommendations on installation phase.	130	10 reports	1,300
<b>Subtotal</b>			<b>37 responses</b>	<b>6,070 hours</b>
<b>Inspection, Maintenance, and Assessment of Platforms</b>				

Citation 30 CFR 250 Subpart I and related NTLs	Reporting and/or Recordkeeping Requirement	Hour Burden	Average No. of Annual Reponses	Annual Burden Hours
		Non-Hour Cost Burdens*		
919(a)	Develop in-service inspection plan and keep on file. Submit annual (November 1 of each year) report on inspection of platforms or floating production facilities, including summary of testing results.	130	130 lessees	16,900
919(b) NTL	After an environmental event, submit to Regional Supervisor initial report followed by updates and supporting information.	25 (initial)	150 reports	3,750
		15 (update)	90 reports	1,350
919(c) NTL	Submit results of inspections.	150	200 results	30,000
920(a)	Demonstrate platform is able to withstand environmental loadings for appropriate exposure category.	30	400 occurrences	12,000
920(c)	Submit application and obtain approval from the Regional Supervisor for mitigation actions (includes operational procedures).	40	200 submittals	8,000
920(e)	Submit a list of all platforms you operate, and appropriate supporting data, every 5 years or as directed by the Regional Supervisor.	100	130 operators / 5 years = 26 per year	2,600
920(f)	Obtain approval from the Regional Supervisor for any change in the platform.	50	2	100
<b>Subtotal</b>			<b>1,198 responses</b>	<b>74,700 hours</b>
<b>General Departure</b>				
900 thru 921	General departure and alternative compliance requests not specifically covered elsewhere in Subpart I regulations.	10	10 requests	100 hours
<b>TOTAL BURDEN</b>			<b>1,975 Responses</b>	<b>116,341 Hours</b>
			<b>\$331,079 Non-Hour Cost Burdens</b>	

\* The non-hour cost burdens associated with this ICR relate to cost recovery fees. These fees are based on actual monies received in FY2010 thru the Pay.gov system.

*(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 under “Annual Cost to the Federal Government.”*

The average respondent cost is \$90/hour. This cost is broken out in the following 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)/rounded
Secretary/ Administrative Assistant	6	\$21	\$29	15%	\$4
Petroleum Engineer	All	\$68	\$95	65%	\$62



	Workers				
Management	14	\$84	\$118	20%	\$24
<b>Weighted Average (\$/hour)</b>					<b>\$90</b>

\* Please note that this BLS source reflects their last update from December 2009.

\*\* A multiplier of 1.4 (as implied by BLS news release USDL-10-1687, December 8, 2010 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

Based on a cost factor of \$90 per hour, we estimate the total annual cost to industry is \$10,470,690 (\$90 x 116,341 hours = \$10,470,690).

**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 four non-hour cost burdens for various platform applications/installations. The platform fees are as follows: \$21,075 for installation under the Platform Verification Program; \$3,018 for installation of fixed structures under the Platform Approval Program; \$1,536 for installation of Caisson/Well Protectors; and \$3,601 for modifications and/or repairs (see § 250.125). We have not identified any other non-hour cost burdens associated with this collection of information, and we estimate a total reporting non-hour cost burden of \$331,079. Refer to the chart in Section A.12 of this supporting statement for the specific fee breakdown.

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

The average Federal cost is \$68/hour. This cost is broken out in the following table using the current Office of Personnel Management salary data for the REST OF THE UNITED STATES (<http://www.opm.gov/oca/11tables/>).

Position	Grade	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.5 x \$/hour /rounded)*	Percent of time spent on collection	Weighted Average (\$/hour)
Clerical	GS-7/5	\$21	\$32	15%	\$5
Petroleum Engineer	GS-13/5	\$45	\$68	65%	\$44
Supv. Petroleum Engineer	GS-15/5	\$63	\$95	20%	\$19
<b>Weighted Average (\$/hour)</b>					<b>\$68</b>

\* A multiplier of 1.5 (as implied by BLS news release USDL-10-1687, December 8, 2010 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

To analyze and review the information required by 30 CFR Part 250, Subpart I, we estimate the Government will spend an average of 6.3 hours for every response submitted to BOEMRE for a total of 12,443 (rounded) hours. Based on a cost factor of \$68 per hour, the total gross annualized cost to the Government is \$846,124 (6.3 hours x 1,975 annual responses = 12,443 rounded hours x \$68/hour = \$846,124).

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

The currently approved OMB inventory includes 108,933 burden hours for this collection. This submission requests 116,341 burden hours. The adjustment increase of 7,408 hours is due to re-estimating the average amount of time required to respond and the number of annual responses for the based on consultations.

The currently approved OMB non-hour cost inventory includes \$926,150. This submission requests \$331,079. The adjustment decrease of \$595,071 is a result of receiving less applications in FY10; this figure is based on the actual number of cost recovery fees collected through Pay.gov.

**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.**

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.**

BOEMRE will display the OMB Control Number and expiration date.

**18. Explain each exception to the topics of the certification statement identified in, “Certification for Paperwork Reduction Act Submission.”**

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.”