

Supporting Statement A for Paperwork Reduction Act Submissions
30 CFR 551, Geological and Geophysical (G&G) Explorations of the Outer Continental Shelf
Form BOEM-0327
OMB Control Number 1010-0048
Current Expiration Date August 31, 2012

Terms of Clearance: Prior to resubmission of this information collection, the agency should validate and/or revise estimates of burden to reflect respondent experience and changes in the number of responses after the 2008 rule. *Response:* For this renewal, BOEM has contacted respondents and revised burden estimates and number of responses, as appropriate, to reflect the implementation of the 2008 rulemaking (1010-AD41).

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 information collection request (ICR) contain surveys, censuses, or employ statistical methods?" is checked "Yes," then a Supporting Statement B must be completed. The Office of Management and Budget (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 to prescribe rules and regulations to administer leasing of mineral resources on the OCS.

The OCS Lands Act (43 U.S.C. 1340) also states that "any person authorized by the Secretary may conduct geological and geophysical explorations in the [O]uter Continental Shelf, which do not interfere with or endanger actual operations under any lease maintained or granted pursuant to this OCS Lands Act, and which are not unduly harmful to aquatic life in such area." The section further requires that permits to conduct such activities may only be issued if it is determined that the applicant is qualified; the activities are not polluting, hazardous, or unsafe; they do not interfere with other users of the area; and they do not disturb a site, structure, or object of historical or archaeological significance. Applicants for permits are required to submit form BOEM-0327 to provide the information necessary to evaluate their qualifications. Upon approval, respondents are issued a permit. In this collection, the form is being modified to clarify for potential permittees existing requirements in light of new technologies. In particular, BOEM-0327 clarifies the type(s) of information and maps submitted as identified in Attachment 1, sections A, General Information, B & C Geological and Geophysical Exploration for Minerals and Scientific Research, and primarily D, Proprietary Information. These modifications reflect information and technology currently used and developed by industry.

The OCS Lands Act (43 U.S.C. 1352) further requires that certain costs be reimbursed to the parties submitting required G&G information and data. Under the OCS Lands Act, permittees are to be reimbursed for the costs of reproducing any G&G data required to be submitted. Permittees are to be reimbursed also for the reasonable cost of processing geophysical information required to be submitted when processing is in a form or manner required by the Director, BOEM, and is not used in the normal conduct of the business of the permittee.

The Independent Offices Appropriations Act (31 U.S.C. 9701), the Omnibus Appropriations Bill (Pub. L. 104-133, 110 Stat. 1321, April 26, 1996), and the OMB Circular A-25, authorize Federal agencies to recover the full cost of services that confer special benefits. All G & G permits are subject to cost recovery, and BOEM regulations specify service fees for these requests.

Effective October 1, 2011, the Department's responsibilities for leasing, exploration, and development of the nation's offshore resources became the responsibility of the Bureau of Ocean Energy Management (BOEM), per Secretarial Order 3299. Regulations to carry out these responsibilities are contained in 30 CFR 551 (previously assigned under 30 CFR 251). This request is a revision of the currently approved information collection (IC) because we are revising form BOEM-0327 to adapt to new advances in technology.

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.

BOEM uses the information to ensure there is no environmental degradation, personal harm or unsafe operations and conditions, damage to historical or archaeological sites, or interference with other uses; to analyze and evaluate preliminary or planned drilling activities; to monitor progress and activities in the OCS; to acquire G&G data and information collected under a Federal permit offshore; and to determine eligibility for reimbursement from the government for certain costs. BOEM uses information collected to understand the G&G characteristics of oil- and gas-bearing physiographic regions of the OCS. It aids the Secretary in obtaining a proper balance among the potentials for environmental damage, the discovery of oil and gas, and adverse impacts on affected coastal states. Information from permittees is necessary to determine the propriety and amount of reimbursement.

Form BOEM-0327 is submitted under this subpart to determine if permittees have the necessary qualifications pertinent to G&G explorations or scientific research. This ICR also clarifies the type(s) of information and maps submitted as identified in Attachment 1, sections A, General Information, B & C Geological and Geophysical Exploration for Minerals and Scientific Research, and primarily D, Proprietary Information of the form. These clarifications reflect information and technology currently used and developed by industry, in areas such as energy sources, navigation and location, maps, and charts, etc. This information can also be used to satisfy other environmental compliance requirements and is completed by industry in their normal course of business and does not represent any new or additional burden hours.

BOEM-0327 -- Requirements for Geological and Geophysical Explorations or Scientific Research on the Outer Continental Shelf – Application for Permit to Conduct Geological or Geophysical Exploration for Mineral Resources or Scientific Research on the Outer Continental Shelf (Attachment 1) – Nonexclusive Use Agreement for Scientific Research (Attachment 2).

This form consists of the requirements for G&G activities requiring Permits and Notices along with the application that the respondent submits to BOEM for approval, as well as a nonexclusive use agreement for scientific research, if applicable. The requirements portion of the form lets the respondents know the authority, requirements, along with other relevant information for the permit.

Attachment 1 of the form, Application for Permit to Conduct Geological or Geophysical Exploration for Mineral Resources or Scientific Research on the Outer Continental Shelf, requires the respondent to fill in pertinent information relating to the company and the type of activity that will be conducted, along with all relevant information.

Attachment 2 of the form, Nonexclusive Use Agreement for Scientific Research on the Outer Continental Shelf, consists of information pertaining to which data and information resulted from the proposed activity will be made available to the public for inspection; applicant agreement that information obtained will not be sold or withheld for exclusive use; and applicant signs and submits to BOEM for approval.

Upon approval, respondents are issued a permit on either Form BOEM-0328 or BOEM-0329 depending on whether they are conducting scientific research for geological or geophysical mineral resources.

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, 10 percent of all information is submitted electronically.

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

There is no duplication. The DOI is the agency with specific statutory authority. Respondents are applying for individual permits, and each notice for processing of G&G data is unique, as are requests for reimbursement. There is no similar information available. To the extent that identical information or data were available from prior permits or other sources, BOEM would not require respondents to resubmit such information or data.

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

This regulation could involve small businesses or other small entities if they desire to perform G&G exploration offshore. However, the majority of entities conducting offshore activities are not considered small because of the technical and financial resources needed to carry out such activities. BOEM needs the delineated information to evaluate all applications and notices, regardless of the size of the respondent. There is no method to minimize the burden. The OCS Lands Act and these implementing regulations (§ 551.13) require us to reimburse respondents for their costs of reproduction and processing of data and information that BOEM requests. We also pay respondents if they request reimbursement for food, quarters, or transportation they provide BOEM representatives (§ 551.8(a)) during inspections. These reimbursements eliminate a cost burden on both small and large businesses.

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

Except for status reports, the information is on occasion or as specified in the permits. Therefore, less frequent reporting would not be possible. The frequency of status reports varies according to the permit specifications. The reports are necessary for resource evaluation and ecological consequences. If BOEM did not collect the information, the Secretary could not meet the obligations of the OCS Lands Act in a timely manner, possibly resulting in economic losses to the Federal Government.

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;

Not applicable in this collection.

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

Section 551.14(c) and the permit form states that BOEM will provide a notice of intent to disclose data or information to an independent contractor or agent or to an adjacent state. The notice will afford the permittee a period of not less than 5 working days in which to submit comments on the intended action. Industry is aware through the regulations and the permits, that BOEM may have a contractor reproduce, process, etc., data for a sale evaluation. BOEM may only have 90 days in which to conduct the entire sale. Therefore, if there were any special circumstances, the permittee would need to notify BOEM immediately, which would allow for a longer response time if feasible.

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

Respondents must submit four copies of form BOEM-0327. After BOEM approval, one signed copy is needed for the OCS region, the permittee, the permittee's contractor, and the public. The copy for the public, however, will not include some information in item D that is determined to be proprietary data and not subject to release.

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

The permit forms specify that at any time within 10 years after receiving notification of the completion of the acquisition activities conducted under the permit, BOEM may request that the permittee submit for inspection and possible retention all or part of the G&G data and/or information. As a normal business practice, respondents will generally retain acquired G&G data and/or information for very long periods of time, beyond even the 10-year requirement in the permit forms. This is not an unreasonable retention period for valuable resources data and/or information that BOEM may need at a future date if it conducts a strategic sale or requires data to conduct a national or regional resource assessment.

(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), BOEM provided a 60-day notice in the Federal Register on June 30, 2011 (76 FR 38412). Also, both 30 CFR 551.15 and the Paperwork Reduction Act statement on BOEM Form 0327 explain that BOEM 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 BOEM. We received two comments in response to the Federal Register notice. The first commenter, the Marine Mammal Commission stated that it was in support of our submission to OMB. The second commenter, Center for Regulatory Effectiveness, requested two actions. One, that we should state that we are not submitting any ICR for seismic regulations that is more stringent than current regulations, including NTL 2007-G02. Response: For the renewal of this ICR, we are not requesting anything more stringent than in current 30 CFR 551 regulations; NTL 2007-G02 is covered under OMB Control Number 1010-0151. Second, that we wait to submit the ICR to OMB. There is current on-going litigation pertaining to seismic regulations (BOEM vs environmental plaintiff(s)). Response: This particular ICR renewal pertains mostly to revising the form currently in use due to new developments in technology; we are not requesting any new requirements. If the lawsuit settlement or decree requires changes to the form and/or DOI regulations, information collection coordination and OMB approval will occur before the form is reissued or regulations are promulgated.

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

Peter Seidel, TGS NOPEC Geophysical Company, Project Manager,
(713) 202-3580, City West Boulevard, Suite #200, Houston, TX 77042

Paul Bourgeois, Fairfield Industries, Permit and Data Acquisition Division,
(281) 275-7550, 1111 Gillingham Lane, Sugar Land, Texas 77478

Lyndon Findley, Western-Geco USA (Alaska), Manager,
(713) 689-6816, 10001 Richmond Avenue, Houston, TX 77252

Jack Butcher, CGGVeritas, Project Supervisor,
(832) 351-8428, 10300 Town Park Drive, Houston, TX 77072

W. Kerry Behrens, Fugro Geoservices, Inc., Senior Geosciences Manager,
(337) 237-2636, 200 Dulles Drive, Lafayette, Louisiana 70506

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

The OCS Lands Act mandates that we reimburse respondents for their reproduction and processing costs of certain data and information that BOEM requests. These implementing regulations and permit forms comply with the OCS Lands Act and provide for reimbursement payment of the G&G data and information when applicable. We also pay respondents if they request reimbursement for food, quarters, or transportation they provide BOEM representatives during inspections. We do not provide gifts to respondents.

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

We protect proprietary information according to the Freedom of Information Act (5 U.S.C. 552) and its implementing regulations (43 CFR part 2), and under regulations at 30 CFR 551.

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 OCS oil, gas, and sulphur lessees and holders of pipeline rights-of-way. 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. Submissions are generally on occasion, weekly, monthly, semi-annually, annually, and varies by section. We estimate the total annual burden is 1,033 hours. Refer to the following table for a breakdown of the burdens.

Burden Table

Citation 30 CFR 551	Reporting and Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
		Non-Hour Cost Burden*		
30 CFR 551.1 through 551.6				
551.4(a), (b); 551.5(a), (b), (d); 551.6; 551.7	Apply for permits (form BOEM-0327) to conduct G&G exploration, including deep stratigraphic tests/revisions when necessary.	3	74 Applications	222
		74 applications X \$2,012 = \$148,888		
551.4(b); 551.5(c), (d); 551.6	File notices to conduct scientific research activities, including notice to BOEM prior to beginning and after concluding activities.	1	3 Notices	3
551.6(b) 551.7(b) (5)	Notify BOEM if specific actions should occur; report archaeological resources (no instances reported since 1982).	1	1 Notice	1
Subtotal			78 responses	226 hours
			\$148,888 non-hour cost burden	
30 CFR 551.7 through 551.9				
551.7	Submit information on test drilling activities under a permit.	Burden included under BSEE regulations at 30 CFR 250, subpart D.		0
551.7(c)	Enter into agreement for group participation in test drilling, including publishing summary statement; provide BOEM copy of notice/list of participants (no agreements submitted since 1989).	1	1 Agreement	1
551.7(d)	Submit bond(s) on deep stratigraphic test.	Burden included under 30 CFR part 556 (1010-0006).		0
551.8(a)	Request reimbursement for certain costs associated with BOEM inspections (no requests in many years).	1	1 Request	1
551.8(b), (c)	Submit modifications to, and status/final reports on, activities conducted under a permit.	2	55 Respondents x 3 Reports = 165	330
551.9(c)	Notify BOEM to relinquish a permit.	1/2	2 Notices	1
Subtotal			169 responses	333 hours
30 CFR 551.10 through 551.13				
551.10(c)	File appeals.	Exempt under 5 CFR 1320.4(a)(2), (c).		0
551.11; 551.12	Notify BOEM and submit G&G data and/or information collected under a permit and/or processed by permittees or 3 rd parties, including reports, logs or charts, results, analyses, descriptions, etc.	4	40 Submissions	160
551.13	Request reimbursement for certain costs associated with reproducing data/information.	2	40 Submissions	80

Citation 30 CFR 551	Reporting and Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
		Non-Hour Cost Burden*		
Subtotal			80 responses	240 hours
30 CFR 551.14				
551.14(a), (b)	Submit comments on BOEM intent to disclose data and/or information to the public.	1	1 Comment	1
551.14(c)(2)	Submit comments on BOEM intent to disclose data and/or information to an independent contractor /agent.	1	1 Comment	1
551.14(c)(4)	Contractor/agent submits written commitment not to sell, trade, license, or disclose data and/or information without BOEM consent.	1	1 Commitment	1
551.1 - 551.14	General departure and alternative compliance requests not specifically covered elsewhere in part 551 regulations.	1	1 Request	1
Subtotal			4 responses	4 hours
Extension for Permit Form & Recordkeeping				
BOEM-0327; 551.14(b)	Request extension of permit time period.	1	100 Extensions	100
	Retain G&G data/information for 10 years and make available to BOEM upon request.	1	130 Recordkeepers	130
Subtotal			230 responses	230 hours
Total Burden			561 Responses	1,033 Hours
			\$148,888 Non-Hour Cost Burden	

* The non-hour cost burdens that are associated with cost recovery monies collected are based on actual submittals through Pay.gov for FY 2010.

(c) Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under “annual Cost to the Federal Government.”

The average respondent cost is \$42/hour (rounded). This cost is broken out in the below table using the Bureau of Labor Statistics data for the Houston, TX area*. See BLS website:

<http://www.bls.gov/bls/wages.htm>.

Position	Level	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.4** x \$/hour)	Percent of time spent on collection	Weighted Average (\$/hour)
Secretary/Administrative	6	\$21	\$29	65%	\$19
Cartographer***	9	\$28	\$39	10%	\$4
Regulatory Geoscientist	All Workers	\$53	\$74	20%	\$15
Staff Level Geoscientist	All Workers	\$53	\$74	5%	\$4
Weighted Average (\$/hour)					\$42

* Note that this BLS source reflects their last update from December 2009.

** A multiplier of 1.4 (as implied by BLS news release USDL 11-1305, September 8, 2011 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

*** Job title not found in BLS

Based on a cost factor of \$42 per hour (rounded), we estimate the total annual cost to industry is \$43,386 (\$42 x 1,033 hours = \$43,386).

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.

(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 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.

(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 one non-hour cost burden for this collection of information. Under § 551.5(a) there is an application fee of \$2,012 when respondents submit a permit application. We have not identified any other non-hour cost burden associated with this collection of information, and we estimate a total reporting non-hour cost burden of \$148,888. Refer to the table in Section A.12.

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 cost to the Federal government is \$49/hour (rounded). This cost is broken out in the below table using the Office of Personnel Management pay schedule for the REST OF UNITED STATES (Consisting of the portions of the lower 48 United States not located within another locality pay area) (<http://www.opm.gov/oca/10tables/>).

Position	Grade	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.5* x \$/hour)	Percent of time spent on collection	Weighted Average (\$/hour)
Clerical	GS-5/5	\$17	\$26	15%	\$4
Geophysicist	GS-11/5	\$31	\$47	70%	\$33

Supv. Geophysicist	GS-13/5	\$44	\$66	5%	\$3
Supv. Geophysicist	GS-14/5	\$53	\$80	5%	\$4
Regional Geol. Supv.	GS-15/5	\$62	\$93	5%	\$5
Weighted Average (\$/hour)					\$49

* A multiplier of 1.5 (as implied by BLS news release USDL 11-0849, June 8, 2011 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

We estimate that to analyze and review the information, BOEM will spend approximately 1,097 hours annually. Based on a cost factor of \$49 per hour, we estimate the total annual burden on the Government is \$53,753 (\$49 x 1,097 hours = \$53,753). The annual hours are based on the following:

§ 551.4, 551.5, 551.6	74 applications x 6 hours =	444 hours
§ 551.8	165 reports x 2 hours =	330 hours
§ 551.9	2 responses x 1/2 hour =	1 hours
§§ 551.11, 551.12	40 responses x 1 hours =	40 hours
§ 551.13	40 responses x 2 hours =	80 hours
Miscellaneous Reviews	202 hours =	<u>202</u> hours

1,097 hours

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

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

The currently approved annual hour burden is 1,246 hours. This submission requests 1,033 hours. The currently approved annual reporting and recordkeeping non-hour cost burden is \$289,728. This submission requests \$148,888.

a. There is an adjustment decrease of 213 hours that is a result of: (1) re-estimating the average number of annual responses and the amount of time required to respond due to the changes in the form based on consultations; (2) when this collection was submitted previously, the requirements under 30 CFR 551.14 were inadvertently submitted into OMB’s electronic reporting system as 7 hours when all the supporting documentation showed the burden as 4 hours. Therefore, we are correcting this previous error.

b. There is an adjustment decrease of \$140,840 as a result of re-estimating the number of annual responses that have a cost recovery fee associated with the response. This resulted in a decrease in non-hour cost burdens.

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.

BOEM 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.

BOEM will display the OMB control number and approved expiration date.

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

To the extent that the topics apply to this collection of information, we are not making any exceptions to the Certification for Paperwork Reduction Act Submissions.