

Supporting Statement for Paperwork Reduction Act Submissions
30 CFR 250, Subpart J, Pipelines and Pipeline Rights-of-Way
Forms MMS-149 and MMS-2030
OMB Control Number 1010-0050
Current Expiration Date: March 31, 2009

Terms of Clearance None

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i) (iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When statistical methods are employed, Section B of the Supporting Statement must be completed. The 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. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Outer Continental Shelf (OCS) Lands Act, as amended (43 U.S.C. 1331 *et seq.* and 43 U.S.C. 1801 *et seq.*), authorizes the Secretary of the Interior (Secretary) to prescribe rules and regulations to manage the mineral resources of the OCS. Such rules and regulations will apply to all operations conducted under a lease, right-of-use and easement, and pipeline right-of-way (ROW). 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 1334(e) authorizes the Secretary to grant ROWs through the submerged lands of the OCS for pipelines ". . . for the transportation of oil, natural gas, sulphur, or other minerals, or under such regulations and upon such conditions as may be prescribed by the Secretary, . . . including (as provided in section 1347(b) of this title) assuring maximum environmental protection by utilization of the best available and safest technologies, including the safest practices for pipeline burial. . . ."

The Independent Offices Appropriations Act (31 U.S.C. 9701), the Omnibus Appropriations Bill (P. L. 104-133, 110 Stat. 1321, April 26, 1996), and the Office of Management and Budget (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 (DOI) implementing policy, the Minerals Management Service (MMS) is required to charge the full cost 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. Pipeline ROWs and assignments are subject to cost recovery, and MMS regulations specify filing fees for applications.

This information collection (IC) request is a revision to the OMB approval of the IC burdens required in the regulations at 30 CFR 250, subpart J, on pipelines and pipeline ROWs. The program change is due to recent final rulemaking concerning cost recovery fees. The adjustments are the decreased burden hours and non-hour cost burdens that are based upon reductions in the number of annual responses. These circumstances are explained in Section A.15. This IC also covers related Notices to Lessees and Operators (NTLs) that MMS issues to clarify, supplement, or provide more detail about certain requirements and to outline what must be provided as required information in the various submissions to MMS (see 30 CFR 250.103). Included with this submission are forms MMS-149 and MMS-2030.

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.]

Lessees and pipeline ROW holders design the pipelines that they install, maintain, and operate. To ensure those activities are performed in a safe manner, MMS needs information concerning the proposed pipeline and safety equipment, inspections and tests, and natural and manmade hazards near the proposed pipeline route. The MMS field offices use the information collected under subpart J to review pipeline designs prior to approving an application for an ROW or lease term pipeline to ensure that the pipeline, as constructed, will provide for safe transportation of minerals through the submerged lands of the OCS. They review proposed pipeline routes to ensure that the pipeline would not conflict with any State requirements or unduly interfere with other OCS activities. The MMS field offices review proposals for taking pipeline safety equipment out of service to ensure alternate measures are used that will properly provide for the safety of the pipeline and associated facilities (platform, etc.). They review notification of relinquishment of an ROW grant and requests to abandon pipelines to ensure that all legal obligations are met and pipelines are properly abandoned. The MMS inspectors monitor the records concerning pipeline inspections and tests to ensure safety of operations and protection of the environment and to schedule their workload to permit witnessing and inspecting operations. Information is also necessary to determine the point at which DOI or Department of Transportation (DOT) has regulatory responsibility for a pipeline and to be informed of the identified operator if not the same as the ROW holder.

The two forms included with this IC request are:

MMS-149 – Assignment of Federal OCS Pipeline Right-of-Way Grant Form

The MMS uses the information to track the ownership of pipeline ROWs. The MMS will use this information to update the corporate database which is used to determine what leases are available for a Lease Sale and the ownership of all OCS leases.

The form asks the pipeline ROW holder to fill in:

- Part A – Assignment
 - the legal description of the pipeline ROW grant being assigned.
 - what specifically the ROW holder is selling, assigning, or transferring,
 - the company name and number of each assignor and assignee,
 - the percentage interest conveyed, and
 - the percentage interest received.
- Part B – Certification and Acceptance
 - assignor(s) signature, name, title, and date.

- assignee(s) signature, name, title, and date.

The form also provides an option to attach an Exhibit A which sets forth other provisions between assignor(s) and assignee(s) and is made a part of the assignment.

If MMS approves the assignment, the authorized MMS official signs and dates the form, and the assignment becomes effective on the date specified by MMS.

MMS-2030 – Outer Continental Shelf (OCS) Pipeline Right-of-Way Grant Bond

The MMS uses this information to ensure compliance of Federal regulations by the surety and ROW holder guaranteeing that funds be made available to complete existing and future obligations.

The form consists of either fill in the blanks or check boxes concerning:

- information relating to the bond, area, additional security, and amount,
- general information relating to the surety,
- general information relating to the principal ROW holder/operator of the bond,
- area(s) covered by the bond and/or additional security,
- obligation requirements, and
- specific signing requirements and supporting information.

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, 5 percent of all information is submitted electronically. The Gulf of Mexico OCS Region (GOMR) is the only region currently involved in new pipeline construction, and it receives approximately 99 percent of the information collection under subpart J. The GOMR has a pipeline mapping system that provides the oil and gas industry and the general public with offshore pipeline location information in a timely manner. As part of the application process and pipeline construction reports, respondents submit location data digitally either by diskette or by email to the GOMR engineer reviewing their information. The MMS inputs the incoming location data for both proposed and newly built pipelines into an existing database that is posted to the GOMR website. The most notable benefit of this system is that it provides accurate and current information for applicant companies to use, thereby eliminating the time and effort necessary to research the number and location of pipelines that are in the vicinity of the route of their proposed pipeline.

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

The DOI and DOT share jurisdiction over the design, construction, operation, maintenance, and inspection of offshore pipelines located on the OCS. This shared jurisdiction is administered under an MOU. Individual operators of production and transportation facilities define the boundaries of their respective adjoining facilities, thereby determining whether they are under DOI or DOT jurisdiction. According to the MOU, (a) DOI has exclusive jurisdiction for issuing ROWs and easements for off-lease pipelines on the OCS; (b) DOI acts as DOT's agent in inspecting transportation-related pipelines

and associated facilities for compliance with DOT regulations; and (c) the departments work together to avoid duplication in regulations, recordkeeping, or reporting requirements. We use the recordkeeping and reporting required under subpart J in carrying out our responsibilities for pipelines on the OCS. The information 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 does not have a significant economic effect on a substantial number of small entities. Leasehold and pipeline operations in the OCS are relatively large in scale and technically complex. The conduct of these activities requires a large source of financial resources. However, approximately 70 percent of the companies 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 jeopardizing safety and environmental concerns. With respect to the requirements for decommissioned pipelines, if these activities are not performed properly, it is more likely that the other users of the OCS would be adversely affected, many of which are small businesses.

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

If we did not collect the information, MMS could not carry out its mandates under the OCS Lands Act. The MMS would not have the information to make informed decisions on pipeline design, construction, modification, etc., or to approve applications for ROW grants. The frequency of submission is on occasion or annually.

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.

Not applicable in this collection.

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

Respondents must submit four copies of pipeline applications and supporting documents to MMS. The original application is for technical review and to file; one copy each is necessary for environmental review and transmittal to the appropriate Federal agencies, and a copy is for the public.

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

Not applicable in this collection.

(e) in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study.

Not applicable in this collection.

(f) requiring the use of statistical data classification that has been reviewed and approved by OMB.

There are no special circumstances with respect to 5 CFR 1320.5(d)(2)(v) through (viii) as the collection is not a statistical survey and does not use statistical data classification.

(g) that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.

This collection does not include a pledge of confidentiality not supported by statute or regulation.

(h) requiring respondents to submit proprietary trade secrets or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

This collection does not require proprietary, trade secret, or other confidential information not protected by agency procedures.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice [and in response to the PRA statement associated with the collection over the past 3 years] and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. [Please list the names, titles, addresses, and phone numbers of persons contacted.] Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

As required in 5 CFR 1320.8(d), MMS published a 60-day notice in the Federal Register (73 FR 53274, September 15, 2008). Also, 30 CFR 250.199 explains that MMS will accept comments at any time on the information collection burden of our 30 CFR 250 regulations and related forms. We display the OMB control numbers and provide the address for sending comments to MMS. We received no comments in response to the notice or unsolicited comments from respondents covered under these regulations.

During the comment period and in connection with the previous submission to OMB, we consulted with the following respondents to verify the accuracy of our burden estimates. The estimates in item A.12 reflect their input.

Anadarko Petroleum Corporation, Susan Hathcock, Regulatory Supervisor,
(832) 636-8758, P. O. Box 1330, Houston, TX 77251-1330

Apache Corporation, Cheryl Powell, Regulatory Supervisor,
(713) 296-6811, 2000 Post Oak Blvd., Suite 100, Houston, TX, 77056

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

Shell Pipeline Company LP, Sharon L. Bevers, Land Agent - Offshore Permitting,
(713) 241-0457, TSP - 1563, 777 Walker, Houston, TX 77002

Pacific Energy Resources LTD., Robert Pyle, Manager, Pipeline & Marine Logistics,
(562)628-1540, 111 West Ocean Boulevard, Suite 1240, Long Beach, CA 90802

DCOR, LLC, Mike Finch, Vice President, ESRC,
(805) 535-2073, 290 Maple Court, Suite 290, Ventura, CA 93003

DCOR, LLC, W.M. Templeton, Manager,
(805) 535-1249, 501 Bath Street, Santa Barbara, CA 93101

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

The MMS does 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.

The MMS will protect information considered proprietary under the Freedom of Information Act (5 U.S.C. 552), its implementing regulations (43 CFR 2), and 30 CFR 250.197, Data and information to be made available to the public or for limited inspection.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The collection does not include sensitive or private questions.

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

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

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

Potential respondents are approximately 130 lessees and operators and 88 holders of pipeline ROWs. The frequency of responses submitted to MMS is usually on occasion and are mandatory or required to obtain or retain a benefit. In calculating the burdens, we assumed that respondents perform certain requirements in the normal course of their activities. We consider these to be usual and customary and took that into account in estimating the burden. We estimate the total annual burden hours to be 76,864, as detailed in the following chart.

BURDEN BREAKDOWN

Citation 30 CFR 250 Subpart J and related NTL(s)	Reporting & Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
		Non-Hour Cost Burdens (Cost Recovery Fees)		
Lease Term (L/T) Pipeline (P/L) Applications				
1000(b)(1); 1004(b)(5); 1007(a)	Submit application and all required information and notices to install new L/T P/L.	145	201-new L/T P/L applications	29,145
		\$3,283 x 201 L/T P/L applications = \$659,883		
1000(b)(1); 1007(b)	Submit application and all required information and notices to modify a L/T P/L	35	131 modifications	4,585
		\$1,906 x 131 L/T P/L applications = \$249,686		
Subtotal		332 responses		33,730 hours
		\$909,569 non-hour cost burdens		
Right of Way (ROW) P/L Applications and Grants				
1000(b)(2), (d); 1004(b)(5); 1007(a); 1009(a); 1011(a); 1015; 1016	Submit application and all required information and notices for new P/L ROW grant and to install a new ROW P/L.	170	102-new ROW grant and P/L applications	17,340
		\$2,569 x 102 applications = \$262,038		
1000(b)(2), (3); 1007(b); 1017	Submit application and all required information and notices to modify a P/L ROW grant and to modify an ROW P/L (includes route modifications, cessation of operations, partial relinquishments, hot taps, and new and modified accessory platforms).	48	162 modifications	7,776
		\$3,865 x 162 applications = \$626,130		
1000(b)(3); 1010(h); 1019; 1017(b)(2)(ii)	Submit application and all required information and notices to relinquish P/L ROW grant.	7	128 relinquishments	896
1011(a)	Provide surety bond using form MMS-2030.	GOM ¼	50 forms	12.5
		Pacific 3.5	3 forms	10.5
1015	Submit application and all required information and notices for ROW grant to convert a lease-term P/L to an ROW P/L.	18	26 conversions	468
		\$219 x 26 applications = \$5,694		
1016	Request opportunity to eliminate conflict when an application has been rejected.	2	1 request	2
1018	Submit application and all required information and notices for assignment of a pipeline ROW grant using Form MMS-149 (burden includes approximately 30 minutes to fill out form).	16	201 assignments	3,216
		\$186 x 201 P/L ROW requests = \$37,386		

Citation 30 CFR 250 Subpart J and related NTL(s)	Reporting & Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
			Non-Hour Cost Burdens (Cost Recovery Fees)	
Subtotal			673 responses	29,721 hours
			\$931,248 non-hour cost burdens	
Notifications and Reports				
1004(b)(5)	In lieu of a continuous volumetric comparison system, request substitution; submit any supporting documentation if requested/required.	36	1 submittal	36
1008(a)	Notify MMS before constructing or relocating a pipeline.	½	546 notices	273
1008(a)	Notify MMS before conducting a pressure test.	½	750 notices	375
1008(b)	Submit L/T P/L construction report.	17	149 reports	2,533
1008(b)	Submit ROW P/L construction report.	17	112 reports	1,904
1008(c)	Notify MMS of any pipeline taken out of service.	½	600 notices	300
1008(d)	Notify MMS of any pipeline safety equipment taken out of service more than 12 hours.	1/5	5 notices	1
1008(e)	Notify MMS of any repair and include procedures.	2	205 notices	410
			\$360 x 205 notices = \$73,800	
1008(e)	Submit repair report.	3	205 reports	615
1008(f)	Submit report of pipeline failure analysis.	30	5 reports	150
1008(g)	Submit plan of corrective action and report of any remedial action.	12	4 plans/reports	48
1008(h)	Submit the results and conclusions of pipe-to-electrolyte potential measurements.	⅛	2,500 results	312.5
1010(c)	Notify MMS of any archaeological resource discovery.	4	2 notices	8
1010(d)	Notify MMS of P/L ROW holder's name and address changes.	Not considered IC under 5 CFR 1320.3(h).		0
Subtotal			5,084 responses	6,966 hours (rounded)
			\$73,800 non-hour cost burdens	
General				
1000(c)(2)	Identify in writing P/L operator on ROW if different from ROW grant holder.	¼	4 submissions	1
1000(c)(3)	Mark specific point on P/L where operating responsibility transfers to transporting operator or depict transfer point on a schematic located on the facility. One-time requirement after final rule published; now part of application or construction process involving no additional burdens.			0
1000(c)(4)	Petition MMS for exceptions to general operations transfer point description.	5	1 petition	5
1000(c)(8)	Request MMS recognize valves landward of last production facility but still located on OCS as point where MMS regulatory authority begins (none received to date).	1	1 request	1
1000(c)(12)	Petition MMS to continue to operate under DOT regulations upstream of last valve on last production facility (one received to date).	40	1 petition	40

Citation 30 CFR 250 Subpart J and related NTL(s)	Reporting & Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
		Non-Hour Cost Burdens (Cost Recovery Fees)		
1000(c)(13)	Transporting P/L operator petition to DOT and MMS to continue to operate under MMS regulations (none received to date)	40	1 petition	40
1004(c)	Place sign on safety equipment identified as ineffective and removed from service.	See footnote 1/		0
1007(a)(4)	Submit required documentation for unbonded flexible pipe.	150	12 submissions	1,800
1000-1019	General departure and alternative compliance requests not specifically covered elsewhere in subpart J regulations.	2	175 requests	350
Subtotal			195 responses	2,237 hours
Recordkeeping				
1000-1008	Make available to MMS design, construction, operation, maintenance, testing, and repair records on lease-term P/Ls ^{2/} .	5	130 lease-term P/L operators	650
1005(a)	Inspect P/L routes for indication of leakage ^{1/} , record results, maintain records 2 years ^{2/} .	2 per month = 24	130 lease-term P/L operators	3,120
1010(g)	Make available to MMS design, construction, operation, maintenance, testing, and repair records on P/L ROW area and improvements ^{2/} .	5	88 P/L ROW holders	440
Subtotal			348 responses	4,210 hours
TOTAL HOUR BURDENS			6,632 responses	76,864 hours
TOTAL NON-HOUR COST BURDENS			\$1,914,617 non-hour cost burdens	

1/ These activities are usual and customary practices for prudent operators.

2/ Retaining these records is usual and customary business practice; required burden is minimal to make available to MMS.

(c) Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.

The average respondent cost is \$78/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)
Administrative	7	\$20	28	5%	\$1
Regulatory***	13	\$55	77	40%	\$31
Engineers, Geologists	13	\$59	83	50%	\$42
Supv. Engineer	15	\$59	83	5%	\$4
Weighted Average (\$/hour)					\$78

* Note that this BLS source reflects their last update from July 2004.

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

*** Professional Occupation n.e.c. (not elsewhere classified)

Based on a cost factor of \$78 per hour, we estimate the total annual cost to industry is \$5,995,392 (\$78 x 76,864 hours = \$5,995,392).

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.

This IC request includes seven non-hour cost burdens, all of which are the cost recovery fees required under 30 CFR 250, subpart J. However, note that the actual fee amounts are specified in 30 CFR 250.125, which provides a consolidated table of all of the fees required under the 30 CFR 250 regulations. The total of the non-hour cost burden (cost recovery fees) in this IC request is an estimated \$1,914,617.

The non-hour cost burdens required in 30 CFR 250, subpart J (and respective cost-recovery fee amount per transaction) are required under:

- § 250.1000(b) – New Pipeline Application (lease term) - \$3,283
- § 250.1000(b) – Pipeline Application Modification (lease term) - \$1,906
- § 250.1000(b) – Pipeline Application Modification (ROW) - \$3,865
- § 250.1008(e) – Pipeline Repair Notification - \$360
- § 250.1015(a) – Pipeline ROW Grant Application - \$2,569
- § 250.1015(a) – Pipeline Conversion from Lease term to ROW - \$219
- § 250.1018(b) – Pipeline ROW Assignment - \$186

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The average government cost is \$52/hour. This cost is broken out in the below table using the current Office of Personnel Management salary data for the New Orleans, LA area. To analyze and review the information respondents submit for subpart J, we estimate the Government will spend an average of approximately 0.5 hours for each hour spent by respondents. The total estimated Government time is 38,432 (.5 * 76,864 = 38,432) hours.

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	\$15	\$23	4%	\$1
Technician(s)	GS-11/5	\$27	\$41	25%	\$10
Engineer(s)	GS-13/5	\$38	\$57	65%	\$37
Supervisory	GS-14/5	\$45	\$68	6%	\$4
Weighted Average (\$/hour)					\$52

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

Based on a cost factor of \$52 per hour, the cost to the government would be \$1,998,464 (76,864 hours x 0.5 = 38,432 hours x \$52 = \$1,998,464).

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

a. The currently approved annual hour burden is 107,874 hours. This submission requests 76,864 hours. The difference is an adjustment decrease of 31,010 hours as a result of re-estimating the average number of annual responses and the amount of time required to respond based on consultations.

b. The currently approved annual reporting and recordkeeping non-hour cost burden is \$2,369,400. This submission requests \$1,914,617 and represents both a program change and an adjustment change to the non-hour cost burdens. The reasons are:

Program: (i) On August 25, 2008, MMS published a final rule (1010-AD43, 73 FR 49943) which increased the cost recovery fees in 30 CFR 250.125. These revised fee amounts became effective on September 24, 2008. The Burden Breakdown table in section A.12 details the annual number of fees and dollar amount totals estimated for these non-hour cost burdens. This resulted in a program change.

Adjustment: (ii) We re-estimated the number of annual responses that have cost recovery fees and determined that there was a decrease in the annual number of responses. This resulted in an adjustment decrease.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The MMS will not tabulate or publish the data.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The MMS will display the OMB approval expiration date on forms MMS-149 and MMS-2030.

18. Explain each exception to the certification statement.

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.