

Supporting Statement A
30 CFR 250, Subpart J, Pipelines and Pipeline Rights-of-Way
OMB Control Number 1014-0016

Terms of Clearance None

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 necessary for the administration of the leasing provisions of the Act related to mineral resources on the OCS. Such rules and regulations apply to all operations conducted under a lease, pipeline right-of-way (ROW), or a right-of-use and easement. 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 (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 (DOI) implementing policy, the Bureau of Safety and Environmental Enforcement (BSEE) is required to charge fees for services that provide special benefits or privileges to an identifiable non-Federal recipient above and beyond those which accrue to the public at large. Pipeline and assignment applications are subject to cost recovery, and BSEE regulations specify the service fees.

This authority and responsibility are among those delegated to BSEE. The 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. Between the initial 60-day FR notice and now, BSEE requested and obtained OMB approval via a Notice of Action (12/12/2011) to transfer 1010-0050 to 1014-0016. This transfer was a result of the Bureau of Ocean Energy Management, Regulations and Enforcement splitting into two bureaus and some specific subpart J regulatory requirements going to both bureaus. Therefore, the program change is due to that final rulemaking (76 FR 64432) where the

requirements pertaining to bonding (Form BOEM-2030; § 250.1011) have been removed from BSEE regulations and are now located in the Bureau of Ocean Energy Management regulations (30 CFR 550.1011). This collection also covers the related Notices to Lessees and Operators (NTLs) that BSEE issues to clarify and provide additional guidance on some aspects of the regulations.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

Lessees and pipeline ROW holders design the pipelines that they install, maintain, and operate. To ensure those activities are performed in a safe manner, BSEE needs information concerning the proposed pipeline and safety equipment, inspections and tests, and natural and manmade hazards near the proposed pipeline route. BSEE uses the information 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. BSEE reviews proposed pipeline routes to ensure that the pipelines would not conflict with any State requirements or unduly interfere with other OCS activities. BSEE reviews 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.). BSEE reviews notifications of relinquishment of ROW grants and requests to decommission pipelines for regulatory compliance and to ensure that all legal obligations are met. BSEE monitors the records concerning pipeline inspections and tests to ensure safety of operations and protection of the environment and to schedule witnessing trips and inspections. 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 pipeline ROW holder.

The form included with this IC request is:

BSEE-0149 – Assignment of Federal OCS Pipeline Right-of-Way Grant

BSEE uses the information to track the holdership of pipeline ROWs; as well as use this information to update the corporate database that 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 provide:

- Part A – Assignment
 - the legal description of the pipeline ROW grant being assigned,
 - what specifically the pipeline 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, and
 - assignee(s) signature, name, title, and date.

If we approve the assignment, the authorized BSEE official signs and dates the form, and the assignment becomes effective on the date specified by us.

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. 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.

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 pipeline ROWs 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 could have a significant economic effect on a substantial number of small entities. Pipeline operations conducted on the OCS are relatively large in scale and technically complex. The conduct of these activities requires that a company have a large source of financial resources. However, approximately 65 percent of the companies have less than 500 employees and are considered small businesses as defined by the Small Business Administration. BSEE regulations require safe work practices and environmental protection; therefore, the hour burden on any small entity subject to these regulations and associated collection of information cannot be reduced to accommodate them. 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, BSEE could not carry out its mandates under the OCS Lands Act. BSEE would not have the information to make informed decisions on pipeline design, construction, modification, decommissioning, etc., or to approve applications for pipeline 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 BSEE. 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;
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), BSEE published a 60-day notice in the *Federal Register* (76 FR 75894, December 5, 2011). Also, 30 CFR 250.199 explains that BSEE will accept comments at any time on the information collection burden of our 30 CFR 250 regulations and related form. We display the OMB control numbers and provide the address for sending comments to BSEE. We received no comments in response to the notice.

During the comment period, BSEE 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:

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

Energy Resource Technology, Inc., Wendy Braddock, Regulatory Manager,
(281) 618-0551, 400 N Sam Houston Pky. East, Suite 400, Houston, TX 77060

Enterprise Products Operating LLC, Denise McGuire, Land Dept. Offshore Rep.,
(713) 381-2517, 1100 Louisiana St., Suite 10, Houston, Texas 77002-5227

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.

BSEE 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.

We will protect information from respondents considered proprietary under the Freedom of Information Act (5 U.S.C. 552) and its implementing regulations (43 CFR part 2); also under regulations at 30 CFR 250.197, "Data and information to be made available to the public or for limited inspection," and 30 CFR 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 lessees, lease operators, and holders of pipeline ROWs. 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 to BSEE 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 55,072 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 (rounded)
		Non-Hour Cost Burdens*		
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.	90	208-new L/T P/L applications	18,720
		\$3,283 x 208 L/T P/L applications = \$682,864		
1000(b)(1); 1007(b)	Submit application and all required information and notices to modify a L/T P/L	30	121 modifications	3,630
		\$1,906 x 121 L/T P/L applications = \$230,626		
1000(b)(1);	Submit an application to decommission a lease-term pipeline	10	228 applications	2,280
Subtotal			557 responses	24,630 hours
			\$913,490 non-hour cost burdens	

Citation 30 CFR 250 Subpart J and related NTL(s)	Reporting & Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (rounded)
		Non-Hour Cost Burdens*		
Right of Way (ROW) P/L Applications and Grants				
1000(b)(2), (d); 1004(b)(5); 1007(a); 1009(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.	110	34-new ROW grant and P/L applications	3,740
		\$2,569 x 34 applications = \$87,346		
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).	45	182 modifications	8,190
		\$3,865 x 182 applications = \$703,430		
1000(b)(3); 1010(h); 1017(b) (2)(ii); 1019	Submit application and all required information and notices to relinquish P/L ROW grant.	10	176 relinquishments	1,760
1015	Submit application and all required information and notices for a P/L ROW grant to convert a lease-term P/L to an ROW P/L.	15	9 conversions	135
		\$219 x 9 applications = \$1,971		
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 BSEE-0149 (burden includes approximately 30 minutes to fill out form).	15	179 assignments	2,685
		\$186 x 179 P/L ROW requests = \$33,294		
Subtotal			581 responses	16,512 hours
			\$826,041 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 BSEE before constructing or relocating a pipeline.	½	300 notices	150
1008(a)	Notify BSEE before conducting a pressure test.	½	400 notices	200
1008(b)	Submit L/T P/L construction report.	20	120 reports	2,400
1008(b)	Submit ROW P/L construction report.	20	110 reports	2,200
1008(c)	Notify BSEE of any pipeline taken out of service.	½	400 notices	200
1008(d)	Notify BSEE of any pipeline safety equipment taken out of service more than 12 hours.	½	2 notices	1
1008(e)	Notify BSEE of any repair and include procedures.	3	237 notices	711
		\$360 x 237 notices = \$85,320		
1008(e)	Submit repair report.	4	200 reports	800
1008(f)	Submit report of pipeline failure analysis.	½	5 reports	3
1008(g)	Submit plan of corrective action and report of any remedial action.	15	5 plans/reports	75
1008(h)	Submit the results and conclusions of pipe-to-electrolyte potential measurements.	1	2,500 results	2,500
1010(c)	Notify BSEE of any archaeological resource discovery.	4	2 notices	8

Citation 30 CFR 250 Subpart J and related NTL(s)	Reporting & Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (rounded)
			Non-Hour Cost Burdens*	
1010(d)	Notify BSEE of P/L ROW holder's name and address changes.		Not considered IC under 5 CFR 1320.3(h).	0
Subtotal			4,282 responses	9,284 hours
			\$85,320 non-hour cost burdens	
General				
1000(c)(2)	Identify in writing P/L operator on ROW if different from ROW grant holder.		Cover by applicable applications	0
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 BSEE for exceptions to general operations transfer point description.	5	1 petition	5
1000(c)(8)	Request BSEE recognize valves landward of last production facility but still located on OCS as point where BSEE regulatory authority begins (none received to date).	1	1 request	1
1000(c)(12)	Petition BSEE to continue to operate under DOT regulations upstream of last valve on last production facility (one received to date).	40	1 petition	40
1000(c)(13)	Transporting P/L operator petition to DOT and BSEE to continue to operate under BSEE 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
1000-1019	General departure and alternative compliance requests not specifically covered elsewhere in subpart J regulations.	2	175 requests	350
Subtotal			179 responses	436 hours
Recordkeeping				
1000-1008	Make available to BSEE 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 BSEE 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			5,947 responses	55,072 hours
TOTAL NON-HOUR COST BURDENS			\$1,824,851 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 BSEE.

* The non-hour cost burdens that are associated with cost recovery monies collected are based on actual submittals through Pay.gov for FY 2011.

(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.

The average respondent cost is \$92/hour (rounded). This cost is broken out in the below table using the Bureau of Labor Statistics data for the Houston, TX area. See BLS website: <http://www.bls.gov/bls/wages.htm>.

Position	Level	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.4** x \$/hour)	Percent of time spent on collection	Weighted Average (\$/hour)
Secretaries and Administrative Assistants	6	\$21	\$29	10%	\$3
Management***	13	\$64	\$90	40%	\$36
Engineers, Geologists	13	\$76	\$106	45%	\$48
Supv. Engineer	13	\$76	\$106	5%	\$5
Weighted Average (\$/hour)					\$92

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

** A multiplier of 1.4 (as implied by BLS news release USDL 11-1718, December 7, 2011 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

*** This position is closest representative to Regulatory Specialist

Based on a cost factor of \$92 per hour, we estimate the total annual cost to industry is \$5,066,624 (\$92 x 55,072 hours = \$5,066,624).

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 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). 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 \$1,824,851.

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.

The average government cost is \$65/hour (rounded). This cost is broken out in the below table using the 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)	Percent of time spent on collection	Weighted Average (\$/hour rounded)
Clerical	GS-7/5	\$21	\$32	10%	\$3
Petroleum Engineer	GS-13/5	\$44	\$66	70%	\$46
Supv. Petroleum Engineer	GS-14/5	\$53	\$80	20%	\$16
Weighted Average (\$/hour)					\$65

*A multiplier of 1.5 (as implied by BLS news release USDL 11-1718, December 7, 2011 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

To analyze and review the information required by subpart J, we estimate the Government will spend an average of approximately .5 hour for each hour spent by the respondents for a total of 27,536 hours. Based on a cost factor of \$65 per hour, the cost to the Government is \$1,789,840 (55,072 (rounded) hours x .5 hour = 27,536 x \$65 = \$1,789,840).

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

- a. The currently approved annual hour burdens are 76,864 hours. This submission requests 55,072 hours. The difference is a program decrease of 21,792 hours. Due to the split of BOEMRE on October 1, 2011, the regulatory requirement and ensuing hour burden for § 250.1011, Bond requirements for pipeline right-of-way holders and Form BOEM-2030, OCS Pipeline ROW Grant Bond, now reside in BOEM § 550.1011, OMB Control Number 1010-0050. This resulted in a program change.
- b. The currently approved non-hour cost burden is \$1,914,617. This submission requests \$1,824,851. This represents an adjustment decrease of \$89,766 due to re-estimating the number of annual responses times its non-hour cost burden.

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.

BSEE 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.

BSEE will display the OMB approval expiration date on form BSEE-0149.

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, BSEE is not making any exceptions to the Certification for Paperwork Reduction Act Submissions.