

**Supporting Statement A**  
**30 CFR 250, Subpart A, General**  
**OMB Control Number 1014-NEW**

**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**

**Justification**

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

To accommodate the split of regulations from the Bureau of Ocean Energy Management, Regulation and Enforcement to BSEE (76 FR 64432), BSEE is requesting OMB approval of the already approved information collections that were previously under 1010-0114 to reflect BSEE’s new 1014 numbering system. This ICR does not change the burden hours or make any other modifications to what was previously approved, other than to remove the collections under the purview of BOEM.

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 necessary for the administration of the leasing provisions of the Act related to mineral resources on the OCS. Such rules and regulations will apply to all operations conducted under a lease, right-of-way, or a right-of-use and easement. 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 1332(6) states that “operations in the [O]uter Continental Shelf should be conducted in a safe manner by well trained personnel using technology, precautions, and other techniques sufficient to prevent or minimize the likelihood of blowouts, loss of well control, fires, spillages, physical obstructions to other users of the waters or subsoil and seabed, or other occurrences which may cause damage to the environment or to property or endanger life or health.”

The Independent Offices Appropriations Act (31 U.S.C. 9701), the Omnibus Appropriations Bill (Pub. L. 104-133, 110 Stat. 1321, April 26, 1996), and OMB Circular A-25, authorize Federal agencies to recover the full cost of services that confer special benefits. Under the Department of the Interior’s implementing policy, the Bureau of 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. A request for approval required in subpart A is subject to cost recovery, and BSEE regulations specify service fees for these requests.

This authority and responsibility are among those delegated to BSEE. The regulations at 30 CFR 250, subpart A concern the general regulatory requirements of the oil, gas, and sulphur operations on the OCS and are the subject of this collection. This request also covers the related Notices to Lessees and Operators (NTLs) that BSEE issues to clarify and provide additional guidance on some aspects of our 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.***

BSEE uses the information collected under the subpart A regulations to ensure that operations on the OCS are carried out in a safe and pollution-free manner, do not interfere with the rights of other users on the OCS, and balance the protection and development of OCS resources. Specifically, we use the information collected to:

- Review records of formal crane operator and rigger training, crane operator qualifications, crane inspections, testing, and maintenance to ensure that lessees/operators perform operations in a safe and workmanlike manner and that equipment is maintained in a safe condition. BSEE also uses the information to make certain that all new and existing cranes installed on OCS fixed platforms must be equipped with anti-two block safety devices, and to assure that uniform methods are employed by lessees for load testing of cranes.
- Review welding plans, procedures, and records to ensure that welding is conducted in a safe and workmanlike manner by trained and experienced personnel.
- Provide lessees/operators greater flexibility to comply with regulatory requirements through approval of alternative equipment or procedures and departures to regulations if they demonstrate equal or better compliance with the appropriate performance standards.
- Ensure that injection of gas promotes conservation of natural resources, prevents waste, and that subsurface storage of natural gas does not unduly interfere with development and production operations under existing leases.
- Record the agent and local agent empowered to receive notices and comply with regulatory orders issued.
- Provide for orderly development of leases through the use of information to determine the appropriateness of lessee/operator requests for suspension of operations, including production.
- Improve safety and environmental protection on the OCS through collection and analysis of accident reports to ascertain the cause of the accidents and to determine ways to prevent recurrences.

- Ascertain when the lease ceases production or when the last well ceases production in order to determine the 180th day after the date of completion of the last production. BSEE will use this information to efficiently maintain the lessee/operator lease status.
- Be informed when there could be a major disruption in the availability and supply of natural gas and oil due to natural occurrences/hurricanes, to advise the U.S. Coast Guard (USCG) in case of the need to rescue offshore workers in distress, to monitor damage to offshore platforms and drilling rigs, and to advise the news media and interested public entities when production is shut-in and when resumed. The Gulf of Mexico OCS Region (GOMR) uses a reporting form, BSEE-0132, Evacuation Statistics, for respondents to report evacuation statistics when necessary. This form requires the respondent to submit general information such as company name, contact, date, time, telephone number, as well as number of platforms and drilling rigs evacuated and not evacuated. We also require production shut-in statistics for oil (BOPD) and gas (MMSCFD).
- Form BSEE-0143, Facility/Equipment Damage Report, assists lessees, lease operators, and pipeline right-of-way holders when reporting damage by a hurricane, earthquake, or other natural phenomenon. They are required to submit an initial damage report to the Regional Supervisor within 48 hours after completing the initial evaluation of the damage and then, subsequent reports, monthly and immediately, whenever information changes until the damaged structure or equipment is returned to service.
- Allow lessees/operators who exhibit unacceptable performance an incremental approach to improving their overall performance prior to a final decision to disqualify a lessee/operator or to pursue debarment proceedings through the execution of a performance improvement plan (PIP). The subpart A regulations do not address the actual process that we will follow in pursuing the disqualification of operators under §§ 250.135 and 250.136. However, our internal enforcement procedures include allowing such operators to demonstrate a commitment to acceptable performance by the submission of a PIP.
- Determine that respondents have corrected all Incidents of Non-Compliance (INC)(s), Form BSEE-1832, identified during inspections. BSEE issues this form to the operator and the operator then corrects the INC(s), signs and returns the form to the BSEE Regional Supervisor within 14 days of issuance.

**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.**

BSEE encourages respondents to use the forms available on the website and submit them electronically as attachments to emails. At present, an estimated 90 percent of submittals pertaining to this collection are being 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.**

The DOI has several Memoranda of Understanding (MOU) that define the responsibilities of each agency with respect to activities in the OCS. These MOU are effective in avoiding duplication of

regulations and reporting requirements. The information collected in subpart A is specific to a lease, a lessee/operator, or a particular request for BSEE approval and is unique to the site and well operation. Except for accident/incident reporting, we are unaware of any duplication or similar information collected by other Federal agencies.

With respect to accident/incident reporting, BSEE believes that it is imperative to upgrade our investigation analysis functions to ensure safety of OCS operations. The USCG currently collects information on incidents onshore and offshore. However, the USCG reports generally are not conducive to in-depth analysis for OCS drilling and production facilities and do not contain the detail necessary to adequately describe accidents/incidents occurring at these facilities.

**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 an economic effect on a number of small entities. Any direct effects primarily impact the OCS lessees and operators. However, many of these OCS lessees and operators may have less than 500 employees and would be considered small businesses as defined by the Small Business Administration. Regulations require safe work practices and protection of the environmental resources; therefore, the hour burden on any small entity subject to these regulations and associated collections of information cannot be reduced to accommodate them.

We also pay respondents if they request reimbursement for food, quarters, or transportation they provide BSEE representatives (§ 250.133) 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.***

If we did not collect the information, BSEE would be unable to effectively carry out the mandate of the OCS Lands Act and administer the offshore program with regard to granting suspensions of operations and production, determining well producibility, conserving resources through the injection and subsurface storage of gas, reimbursing certain costs, monitoring accident reports, reviewing crane records, or allowing lessees greater flexibility in the manner in which they comply with the requirements of regulations under 30 CFR 250 through the adoption of performance standards. Information is collected only once for each particular event, except for the daily reporting during a natural disaster discussed in A.7 below. Therefore, less frequent collection of the information is not applicable.

**7. *Explain any special circumstances that would cause an information collection to be conducted in a manner:***

***(a) requiring respondents to report information to the agency more often than quarterly;***

Two forms need to be filled out and submitted more often than quarterly in the event of a natural disaster (such as hurricanes or earthquakes) based on the requirements in § 250.192: (a) the storm which would make it necessary to evacuate platforms or rigs or to shut-in production, requires daily reporting (Form BSEE-0132, used in the GOMR) during the emergency situation. The reporting requirement would cease when the emergency ended; (b) Form BSEE-0143 (Facility/Equipment Damage Report) requires an initial report within 48 hours after the respondent has evaluated the initial

damage; then monthly reports until the item is returned to service. Quarterly reporting would be completely ineffective for this situation.

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

Also with respect to (a), respondents are required to return copies of Form MMS-1832, Notification of Incidents of Noncompliance (INC), to BSEE within 14 days from the date of issuance. The BSEE issuing office cannot complete the records for an inspection until BSEE receives an acknowledgment of the INCs. Historical records indicate that 14 days is a reasonable time for returning the green copy to the BSEE issuing office and correcting most of the INCs cited. In addition, because INCs generally impact the safety of personnel, equipment, or the environment, they need to be corrected in an expeditious manner. Two weeks is a reasonable timeframe to return the rig or facility to compliance.

***(c) requiring respondents to submit more than an original and two copies of any document;***  
Not applicable in this collection.

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

Section 250.108 clarifies that design and construction records are kept for the life of the crane, including installation records for any anti-two block safety devices. Respondents retain crane operator and rigger qualifications for 4 years at the OCS fixed platform. Retaining this information for the life of the crane at the fixed offshore platform is critical to determining its current safety, probable strength, and integrity, based on its history. As equipment ages, access to all aspects of its inspections, design, maintenance, testing, etc., is necessary to determine whether standards for safety are maintained. The type of information collected is such that it is not unreasonable to expect that respondents would retain it as usual and customary business practice, even if not required in regulations. Crane operators must receive appropriate training every 4 years, and this record retention period allows the records to be available through appropriate refresher training. The requirement is also consistent with the American Petroleum Institute's Recommended Practice 2D, which is a document incorporated by reference in our regulations and specifies this timeframe. Section 250.109 requires respondents to retain information on welding plans at the site where welding occurs. These are ongoing activities, and the approved plans must remain available for reference when needed to safely conduct these activities.

***(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 provided a 60-day notice in the *Federal Register* on February 3, 2012 (77 FR 5561). Also, 30 CFR 250.199 and the Paperwork Reduction Act statement on forms BSEE-0132, BSEE-0143, and BSEE-1832 explains that we 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 BSEE. We received no comments in response to the *Federal Register* notice.

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

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

Eni US Operating Co. Inc., Kathy Gowland, Sr. Regulatory Specialist,  
(504) 593-7152, 1250 Poydras St., Suite # 2000, New Orleans, Louisiana 70113

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

We pay respondents if they request reimbursement for food, quarters, or transportation they provide BSEE representatives (§ 250.133) 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.***

Requests for BSEE approval may contain proprietary information related to performance standards or alternative approaches to conducting operations different from those approved and specified in BSEE regulations. We will protect proprietary information according to the Freedom of Information Act (5 U.S.C. 552), under its implementing regulations (43 CFR 2); as well as 30 CFR 250.197, *Data and information to be made available to the public or for limited inspection*, and 30 CFR 252, *OCS Oil and Gas Information Program*.

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

The collection does not include sensitive or private questions.

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

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

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

Potential respondents include Federal OCS oil, gas, or sulphur lessees/operators. 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, monthly, or vary by section. Responses are mandatory or are required to obtain or retain benefits. We estimate the total annual burden is 50,859 hours. Refer to the following table for a breakdown of the burdens.

**BURDEN BREAKDOWN**

Citation 30 CFR 250 Subpart A and Related Forms/NTLs	Reporting or Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
				Non-Hour Cost Burdens
<b>Authority and Definition of Terms</b>				
104; Form BSEE-1832	Appeal orders or decisions; appeal INCs	Exempt under 5 CFR 1320.4(a)(2), (c).		0
<b>Performance Standards</b>				
109(a); 110	Submit welding, burning, and hot tapping plans.	2	54 plans.	108
118; 121; 124	Apply for injection of gas; use BSEE-approved formula to determine original gas from injected/stored.	10	4 applications.	40
<b>Subtotal</b>			<b>58 responses</b>	<b>148 hours</b>

Citation 30 CFR 250 Subpart A and Related Forms/NTLs	Reporting or Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
		Non-Hour Cost Burdens		
<b>Cost Recovery Fees</b>				
125; 126	Cost Recovery Fees; confirmation receipt etc; verbal approvals pertaining to fees.	Cost Recovery Fees and related items are covered individually throughout this subpart.		0
<b>Forms</b>				
130-133	Submit "green" response copy of Form BSEE-1832 indicating date violations (INCs) corrected.	2	884 forms.	1,768
145	Submit designation of agent and local agent for Regional Supervisor' and/or Regional Director's approval.	1	8 submittals	8
186(a)(3); NTL	Apply to receive administrative entitlements to eWell (electronic/digital form submittals).	Not considered information collection under 5 CFR 1320.3(h)(1).		0
192	Daily report of evacuation statistics for natural occurrence/hurricane (GOMR Form BSEE-0132 (form takes 1 hour)) when circumstances warrant; inform BSEE when you resume production.	1.5	1,950 reports or forms.	2,925
192(b)	Use Form BSEE-0143 to submit an initial damage report to the Regional Supervisor.	3	133 forms.	399
192(b)	Use Form BSEE-0143 to submit subsequent damage reports on a monthly basis until damaged structure or equipment is returned to service; immediately when information changes; date item returned to service must be in final report.	1	133 forms.	133
<b>Subtotal</b>			<b>3,108 responses</b>	<b>5,233 hours</b>
<b>Inspection of Operations</b>				
130-133	Request reconsideration from issuance of an INC.	2	169 requests.	338
	Request waiver of 14-day response time.	1	260 waivers.	260
	Notify BSEE before returning to operations if shut-in.	1	663 notices.	663
133	Request reimbursement for food, quarters, and transportation provided to BSEE representatives (no requests received in many years; minimal burden).	1.5	6 requests.	9
<b>Subtotal</b>			<b>1,098 responses</b>	<b>1,270 hours</b>
<b>Disqualification</b>				
135 BSEE internal process	Submit PIP under BSEE implementing procedures for enforcement actions.	40	3 plans.	120
<b>Subtotal</b>			<b>3 responses</b>	<b>120 hours</b>
<b>Special Types of Approval</b>				
140	Request various oral approvals not specifically covered elsewhere in regulatory requirements.	1	260 requests.	260
140(c)	Submit letter when stopping approved flaring with required information.	Burden covered under 30 CFR 250.1163(e) (1014-0019)		0
141; 198	Request approval to use new or alternative procedures, along with supporting documentation if applicable, including BAST not specifically covered elsewhere in regulatory requirements.	20	490 requests.	9,800
142; 198	Request approval of departure from operating requirements not specifically covered elsewhere in regulatory requirements, along with supporting documentation if applicable.	2.5	952 requests.	2,380
<b>Subtotal</b>			<b>1,702 responses</b>	<b>12,440 hours</b>
<b>Naming and Identifying Facilities and Wells (Does Not Include MODUs)</b>				



Citation 30 CFR 250 Subpart A and Related Forms/NTLs	Reporting or Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
		Non-Hour Cost Burdens		
150; 151; 152; 154(a)	Name and identify facilities, artificial islands, MODUs, helo landing facilities etc., with signs.	3	585 new/replace- ment signs.	1,755
150; 154(b)	Name and identify wells with signs.	2	188 new wells.	376
<b>Subtotal</b>			<b>773 responses</b>	<b>2,131 hours</b>
<b>Suspensions</b>				
168; 170; 171; 172; 174; 175; 177; 180(b), (d)	Request suspension of operation or production; submit schedule of work leading to commencement; supporting information; include pay.gov confirmation receipt.	10	1,661 requests	16,610
	Submit progress reports on SOO or SOP as condition of approval.	3	703 reports	2,109
172(b); 177(a)	Conduct site-specific study; submit results; request payment by another party. No instances requiring this study in several years--could be necessary if a situation occurred such as severe damage to a platform or structure caused by a hurricane or a vessel collision.	100	1 study/report	100
177(b), (c), (d)	Various references to submitting new, revised, or modified exploration plan, development/production plan, or development operations coordination document.	Burden covered under BOEM's 30 CFR 550, subpart B, 1010-0151.		0
<b>Subtotal</b>			<b>2,365 responses</b>	<b>18,819 hours</b>
			<b>\$3,268,848 non-hour cost burden</b>	
<b>Primary Lease Requirements, Lease Term Extensions, and Lease Cancellations</b>				
180(a), (h), (i),	Notify and submit report on various leaseholding operations and lease production activities.	2	53 reports or notices	106
180(f), (g), (h), (i)	Submit various operations and production data to demonstrate production in paying quantities to maintain lease beyond primary term; notify BSEE when you begin conducting operations beyond its primary term.	2	404 submissions/ notifications	808
		0.5		202
180(e), (j)	Request more than 180 days to resume operations; notify BSEE if operations do not begin within 180 days.	4	88 requests/ notifications	352
		0.5		44
<b>Subtotal</b>			<b>545 responses</b>	<b>1,512 hours</b>
<b>Information and Reporting Requirements</b>				
186; NTL	Submit information and reports, as BSEE requires.	10	200	2,000
187; 188(a-b); 189; 190(a-c); 192; NTL	Report to the District Manager immediately via oral communication and written follow-up within 15 calendar days, incidents pertaining to: fatalities; injuries; LoWC; fires; explosions; all collisions resulting in property or equipment damage >\$25K; structural damage to an OCS facility; cranes; incidents that damage or disable safety systems or equipment (including firefighting systems); include hurricane reports such as platform/rig evacuation, rig damage, P/L damage, and platform damage; operations personnel to muster for evacuation not related to weather or drills; any additional information required. If requested, submit copy marked as public information.	Oral 0.5	898	449
		Written 2.5	950	2,375
187(d)	Report all spills of oil or other liquid pollutants.	Burden covered under 30 CFR 254 (1014-0007).		0
188(a)(5)	Report to District Manager hydrogen sulfide (H2S) gas releases immediately by oral communication.	Burden covered under 30 CFR 250, subpart D, 1014-0018.		0
191	Submit written statement/Request compensation mileage and services for testimony re: accident investigation.	Exempt under 5 CFR 1320.4(a)(2), (c).		0
193	Report apparent violations or non-compliance.	1.5	6 reports	9

Citation 30 CFR 250 Subpart A and Related Forms/NTLs	Reporting or Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
		Non-Hour Cost Burdens		
194(c)	Report archaeological discoveries.	2	6 reports	12
195	Notify District Manager within 5 workdays of putting well in production status (usually oral). Follow-up with either fax/email within same 5 day period (burden includes oral and written).	1	188 notifications	188
196	Submit data/information for post-lease G&G activity and request reimbursement.	Burden covered under BOEM's 30 CFR 551 (1010-0048).		0
197(c)	Submit confidentiality agreement.	1	1	1
101-199	General departure or alternative compliance requests not specifically covered elsewhere in Subpart A.	2	21 requests	42
<b>Subtotal</b>			<b>2,270 responses</b>	<b>5,076 hours</b>
<b>Recordkeeping</b>				
108(e)	Retain records of design and construction for life of crane, including installation records for any anti-two block safety devices; all inspection, testing, and maintenance for at least 4 years; crane operator and all rigger personnel qualifications for at least 4 years.	1.5	2,151 record-keepers	3,227 (rounded)
109(b); 113(c)	Retain welding plan and drawings of safe-welding areas at site; designated person advises in writing that it is safe to weld.	1	637 operations	637
132(b)(3)	During inspections make records available as requested by inspectors.	2	123 requests	246
<b>Subtotal</b>			<b>2,911 responses</b>	<b>4,110 hours</b>
<b>TOTAL BURDEN</b>			<b>14,833 Responses</b>	<b>50,859 Hours</b>
			<b>\$3,268,848 Non-Hour Cost Burdens</b>	

\* 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 \$80/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	25%	\$7
Petroleum Engineers, Geologists	All workers	\$68	\$95	65%	\$62
Supv. Engineer	13	\$76	\$106	10%	\$11
<b>Weighted Average (\$/hour)</b>					<b>\$80</b>

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

\*\* A multiplier of 1.4 (as implied by BLS news release USDL-12-0450, March 14, 2012 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

Based on a cost factor of \$80 per hour, we estimate the total annual cost to industry is \$4,068,720 (\$80 x 50,859 hours = \$4,068,720).

**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 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.**

We have identified one non-hour cost burden. Section 250.171 requests a cost recovery fee for a Suspension of Operations or a Production Request (SOO/SOP). We have not identified any other non-hour cost burdens associated with this collection of information. We estimate a total reporting non-hour cost burden of \$3,268,848. Refer to the table in Section A.12 of this supporting statement for the specific non-hour paperwork cost burden breakdown.

**(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.**

Not applicable in this collection.

**(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.** Not applicable in this collection.

**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.**

To analyze and review the information required by subpart A, we estimate the Government will spend an average of approximately  $\frac{3}{4}$  hour for each hour spent by the respondents for a total of 38,145 (rounded) hours.

The average government cost is \$61/hour. This cost is broken out in the below table using the current Office of Personnel Management salary data for the REST OF THE UNITED STATES (<http://www.opm.gov/oca/12tables/index.asp>).

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	4%	\$1
Technician(s)	GS-11/5	\$31	\$47	25%	\$12
Engineer(s)	GS-13/5	\$44	\$66	65%	\$43
Supervisory Engineer	GS-14/5	\$53	\$80	6%	\$5
<b>Weighted Average (\$/hour)</b>					<b>\$61</b>

\*A multiplier of 1.5 (as implied by BLS news release USDL-12-0450, March 14, 2012 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

Based on a cost factor of \$61 per hour, the cost to the government would be \$2,326,845 (50,859 hours x 0.75 = 38,145 (rounded) hours x \$61 = \$2,326,845).

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

To accommodate the split of regulations from the Bureau of Ocean Energy Management, Regulation and Enforcement to BSEE (76 FR 64432), BSEE is requesting OMB approval of the already approved information collections that were previously under 1010-0114 to reflect BSEE’s new 1014 numbering system. This ICR does not change the burden hours or make any other modifications to what was previously approved, other than to remove the collections under the purview of BOEM. The collections transferred to BSEE represent a program change of 50,859 burden hours and \$3,268,848 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.**

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 number and OMB expiration date on Forms BSEE-0132 and BSEE-0143. Form BSEE-1832 will not display the OMB Control Number since it is professionally printed in quadruplicate and it is not cost effective to reprint every 3 years.

**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.”