

**Supporting Statement A**  
**30 CFR 250, Increased Safety Measures for Oil and Gas Drilling, Well-Completion,  
Well-Workover, and Decommissioning Operations**  
**[Final Rule]**  
**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**

**A. Justification**

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

The Outer Continental Shelf (OCS) Lands Act, as amended (43 U.S.C. 1331 *et seq.* and 43 U.S.C. 1801 *et seq.*), authorizes the Secretary of the Interior to prescribe rules and regulations to administer leasing of mineral resources on the OCS. 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 Outer 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."

An interim final rule (IFR), effective October 14, 2010 (75 FR 63346), implemented certain safety measures outlined in the Secretary of the Interior's report entitled, "Increased Safety Measures for Energy Development on the Outer Continental Shelf" (Safety Measures Report), dated May 27, 2010. The President requested that the Department of the Interior develop this report as a result of the Deepwater Horizon incident on April 20, 2010. On June 2, 2010, the Secretary of the Interior directed the Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE) to adopt the recommendations contained in the Safety Measures Report and to implement them as soon as possible.

This information collection (IC) request concerns the new or revised regulatory requirements that we

are putting into a final rulemaking, 1014-AA02. These new and/or revised requirements are based on comments received from the 1010-AD68 interim final rulemaking and affect various sections of the 30 CFR 250 regulations that will amend drilling regulations in subparts D, E, F, and Q. This includes requirements that will implement various safety measures that pertain to drilling, well-completion, well-workovers, and abandoning / decommissioning operations. The information collected will ensure sufficient redundancy in the BOPs; promote the integrity of the well and enhance well control; and facilitate a culture of safety through operational and personnel management. These requirements will promote human safety and environmental protection.

When the Final Rule becomes effective, we will consolidate these requirements and the respective hour burdens into their primary subparts, 30 CFR 250, subparts D, E, F, and Q.

***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.***

The information collected is needed to address various recommendations from the Secretary's report that were incorporated into the regulations. These regulatory requirements: ensure sufficient redundancy in the BOPs; promote the integrity of the well and enhance well control; and facilitate a culture of safety through operational and personnel management. These regulations improve the safety of offshore oil and gas drilling operations in Federal waters and promote human safety and environmental protection while requiring OCS lessees and operators to follow best industry practices for well control.

***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.***

Based on information obtained from the relevant ICs already approved by OMB, we believe that respondents will submit approximately 75 percent of the required documentation 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 information collected is unique to specific well operations and does not duplicate any other available information; similar information is not readily available or discernible from other sources. The Department of the Interior has several Memoranda of Understanding with other Departments that define the responsibilities of their agencies with respect to activities in the OCS. These are effective in avoiding duplication of regulations and reporting requirements.

***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 have a significant economic effect on a substantial number of small entities. However, because of the overriding need to reduce the chance of a repeat of the BP Deepwater

Horizon catastrophe, and the relatively minor share that small business plays in the deepwater operations, alternatives could not be considered. The burden on any small entity subject to these regulations cannot be reduced to accommodate them without sacrificing safe operations on the OCS.

**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 BSEE did not collect the information, we could not adequately determine whether lessees and operators are properly providing for the safety of operations and the protection of the environment and resources. The information is necessary to carry out the mandate of the OCS Lands Act. The information is generally collected on occasion of drilling activity, well workover, or well completions, and initiated by the respondents' activity. We must have accurate and timely information on the condition of the drilling site to be able to make informed decisions.

**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;**

When submitting paper copies, respondents are required to submit four copies of APDs and APMs: one approved copy each for the OCS Region, the lessee, the lessee's contractor, and the public. The copy for the public will not include the information that is proprietary data and therefore not subject to release.

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

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.***

BSEE published an Interim Final Rule on October 14, 2010 (75 FR 63346). Based on comments received from that rulemaking, we are expanding upon existing and adding new regulatory requirements in 30 CFR 250, subparts D, E, F, and Q. In total, BSEE received 38 comments in response to the Interim Final rule and all comments that were received are addressed in the preamble of the rulemaking. Based on those comments we:

(1) expanded upon and added new regulatory requirements in subpart D that pertain to subsea and surface BOPs, well casing and cementing, secondary intervention, unplanned disconnects, recordkeeping, well completion, and well plugging (+363 burden hours).

(2) added new regulatory requirements to subpart E that pertain to subsea and surface BOPs, secondary intervention, and well-completions (+311 burden hours).

(3) added new regulatory requirements to subpart F that pertain to subsea and surface BOPs, secondary intervention, unplanned disconnects, and well-workers (+776 burden hours).

(4) added new regulatory requirements to subpart Q that pertain to subsea and surface BOPs, secondary intervention, unplanned disconnects and well workers during the abandonment decommissioning process (+3,897 burden hours).

The respondents who submitted comments pertaining to the IC were: Foley Engineering; several sets of comments jointly submitted from API, IPAA, IADC, NOIA, OOC, USOGA, JITF; Defenders of Wildlife; JAB Energy Solutions; Pew Environment Group; and ATP Oil and Gas Corporation.

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

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

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

We protect proprietary information according to the Freedom of Information Act (5 U.S.C. 552) and its implementing regulations (43 CFR 2), 30 CFR 250.197, “Data and information to be made available to the public or for limited inspection,” and 30 CFR part 252, “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 comprise Federal oil and gas OCS lessees and operators. It should be noted that not all of the potential respondents will submit information at any given time 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 the collection of information. Submissions are generally on occasion. We estimate the total annual reporting and recordkeeping burden is 5,347 hours. Refer to the chart for a breakdown of the burden hours.

**BURDEN TABLE**

<b>Citation 30 CFR 250</b>	<b>Reporting &amp; Recordkeeping Requirement</b>	<b>Hour Burden</b>	<b>Average No. of Annual Responses</b>	<b>Annual Burden Hours (rounded)</b>
<b>Subpart D</b>				
410-418; 420(a)(6); 423(b)(3), (c) (3); 449(j), (k) (1); 456(j) plus	Apply for permit to drill APD (Form BSEE-0123) that includes any/all supporting documentation /evidence [including, but not limited to, test results, calculations, pressure integrity, verifications, procedures, criteria,	Burden covered under 1014-0018.		0

various references in subparts A, B, D, E, H, P, Q.	qualifications, etc.] and requests for various approvals required in subpart D (including §§ 250.424, 425, 427, 428, 432, 442(c), 447, 448(c), 451(g), 456(a)(3), (f), 460, 490(c)) and submitted via the form; upon request, make available to BSEE.			
449(j); 460; 465; 514(d); 515; 517(d)(8-9); 614(d); 615; 617(h)(1-2); 1704(g); 1707(d), (h)(1-2); 1709; 1712; 1721(h)	Provide revised plans and the additional supporting information required by the cited regulations [test results, calculations, verifications, procedures, criteria, qualifications, etc.] when you submit an Application for Permit to Modify (APM) (Form BSEE-0124) to BSEE for approval.	Burden covered under 1014-0018.		0
416(g)(2)	Provide 72 hour advance notice of location of shearing ram tests or inspections; allow BSEE access to witness testing, inspections and information verification.	Burden covered under 1014-0018.		0
416(g)(2)	Submit evidence that demonstrates that the Registered Professional Engineer/firm has the expertise and experience necessary to perform the verification(s); allow BSEE access to witness testing; verify info submitted to BSEE.	0.25	700 submittals	175
420(b)(3)	Submit dual mechanical barrier documentation after installation with your EOR.	Burden covered under 1014-0018.		0
420(b)(3)	Request approval for alternative options to installing barriers	0.25	25 requests	7
423(a);	Request alternative approval for other pressure casing test pressures.	Burden covered under 1010-0114.		0
423(a)	Request and receive approval from District Manager for repair.	0.5	88 requests	44
423(b)(3), (c) (4)	Document pressure casing test results and make available to BSEE upon request.	Burden covered under 1014-0018.		0
423(c)(5)	Immediately contact District Manager when problem corrected due to failed negative pressure test; submit a description of corrected action taken; and receive approval from District Manager to retest.	1	14 notifications	14
423(c)(8)	Submit documentation of successful negative pressure test in the EOR (Form BSEE-0125).	2	45 submittals	90
442(f)(3)	Demonstrate that your secondary control system will function properly.	5	1 validation	5
446(a)	Document BOP maintenance and inspection procedures used; record results of BOP inspections and maintenance actions; maintain records for 2 years or longer if directed by BSEE; make available to BSEE upon request.	Burden covered under 1014-0018.		0
449(j)(2)	Notify District Manager at least 72 hours prior to stump/initial test on seafloor.	0.25	110 notifications	28

449(j)(3)*	Document all ROV intervention function test results including how you test each ROV functions; make available to BSEE upon request.	Burden covered under 1014-0018.		0
456(j)	Request approval from the District Manager to displace kill-weight fluids to an underbalanced state; submit detailed written procedures with your APD/APM.	Burden covered under 1014-0018.		0
		<b>Subtotal E</b>	<b>983 responses</b>	<b>363 hours</b>
<b>Subpart E</b>				
514(d)	Request approval from the District Manager to displace kill-weight fluids to an underbalanced state; submit detailed written procedures with your APM.	2	60 requests	120
515	Submit a description of your BOP and its components; schematic drawings; independent third party verification and all supporting information (evidence showing appropriate licenses, has expertise/experience necessary to perform required verifications, etc) with your APM.	15	12 submittals	180
515(e)(2)(ii)	Allow BSEE access to witness testing, inspections, and information verification. Notify District Manager at least 72 hours prior to shearing ram tests.	0.25	12 notifications	3
517(d)(8)*	Function test ROV interventions on your subsea BOP stack; document all test results including how you test each ROV function; submit procedures with your APM for District Manager approval; make available to BSEE upon request.	Burden covered under 1014-0004.		0
517(d)(8)(ii)	Notify District Manager at least 72 hours prior to stump/initial test on seafloor.	0.25	32 notifications	8
517(d)(9)	Document all autoshear and deadman test results and submit test procedures with your APM for District Manager approval; make available to BSEE upon request.	Burden covered under 1014-0004.		0
517(g)(1)	Document BOP inspection procedures used; record results of BOP inspection actions; maintain records for 2 years or longer if directed by BSEE; make available to BSEE upon request.	Burden covered under 1014-0004.		0
517(g)(2)	Request alternative method/frequency to inspect a marine riser.	Burden covered under 1010-0114.		0
517(h)	Document the procedures used for BOP maintenance/quality management; record results; maintain records for 2 years or longer if directed by BSEE; make available to BSEE upon request.	Burden covered under 1014-0004.		0
		<b>Subtotal E</b>	<b>116 responses</b>	<b>311 hours</b>
<b>Subpart F</b>				
614(d)	Request approval from the District Manager to displace kill-weight fluids to an underbalanced	2	80 requests	160

	state; submit detailed written procedures with your APM.			
615	Submit a description of your BOP and its components; schematic drawings; independent third party verification and all supporting information (evidence showing appropriate licenses, has expertise/experience necessary to perform required verifications, etc) with your APM.	15	40 submittals	600
615(e)(2)(ii)	Allow BSEE access to witness testing, inspections, and information verification. Notify District Manager at least 72 hours prior to shearing ram tests.	0.25	12 notifications	5
617(h)(1)*	Document all test results of your ROV intervention functions including how you test each ROV function; submit test procedures with your APM for District Manager approval; make available to BSEE upon request.	Burden covered under 1014-0001.		0
617(h)(1)(ii)	Notify District Manager at least 72 hours prior to stump/initial test on seafloor.	0.25	44 notifications	11
617(h)(2)*	Document all autoshear and deadman test results; submit test procedures with your APM for District Manager approval; make available to BSEE upon request.	Burden covered under 1014-0001.		0
618(a)(1)	Document the procedures used for BOP inspections; record results; maintain records for 2 years or longer if directed by BSEE; make available to BSEE upon request.	Burden covered under 1014-0001.		0
618(a)(2)	Request approval to use alternative method to inspect a marine riser.	Burden covered under 1010-0114.		0
618(b)	Document the procedures used for BOP maintenance; record results; maintain records for 2 years or longer if directed by BSEE; make available to BSEE upon request.	Burden covered under 1014-0001.		0
<b>Subtotal F</b>			<b>176 responses</b>	<b>776 hours</b>
<b>Subpart Q</b>				
1705	Submit a description of your BOP and its components; schematic drawings; independent third party verification and all supporting information (evidence showing appropriate licenses, has expertise/experience necessary to perform required verifications, etc) with your APM.	15	200 submittals	3,000
1705(e)(2)(ii)	Allow BSEE access to witness testing, inspections, and information verification. Notify District Manager at least 72 hours prior to shearing ram tests.	0.25	12 submittals	3
1706(a)	Request approval of well abandonment operations; procedures indicating how the annular preventer will be utilized and how	0.25	200 requests	50



	pressure limitations will be applied during each mode of pressure control, with your APM.			
1706(f)(4)	Request approval of the District Manager to conduct operations without downhole check values; describe procedures/equipment in APM.	1	50 requests	50
1707(a)(2);	Request approval from District Manager to test annular BOP less than 70 percent.	0.25	6 requests	2
1707(b)(2)	State reason for postponing test in operations logs.	0.25	30 reasons	8
1707(b)(2);	Request approval from District Manager for alternate test frequencies if condition/BOP warrant.	0.25	5 requests	2
1707(f);	Request alternative method to record test pressures.	0.25	25 requests	7
1707(f)	Record test pressures during BOP and coiled tubing on a pressure chart or w/digital recorder; certify charts are correct.	1	200 records/ certifications	200
1707(g);	Record or reference in operations log all pertinent information listed in this requirement; make all documents pertaining to BOP tests, actuations and inspections available for BSEE review at facility for duration of well abandonment activity; retain all records for 2 years at a location conveniently available for the District Manager.	0.5	200 records	100
1707(h)(1)	Submit test procedures with your APM for District Manager approval.	1	50 submittals	50
1707(h)(1)(ii)	Document all ROV intervention test results; make available to BSEE upon request.	0.5	50 records	25
1707(h)(2)(ii)	Document all autoshear and deadman function test results; make available to BSEE upon request.	0.25	50 records	13
1708(a), (b)	Document BOP inspection and maintenance procedures used; record results of BOP inspections and maintenance actions; maintain records for 2 years or longer if directed by BSEE; make available to BSEE upon request	1	25 records	25
1708(a)	Request alternative method to inspect marine risers.	0.25	5 requests	2
1709	Request approval from the District Manager to displace kill-weight fluids in an unbalanced state; submit detailed written procedures with your APM.	2	80 requests	160
1712(g); 1721(h)	Submit with your APM, Registered Professional Engineer certification.	Burden covered under 1014-0018.		0
1712(g)*; 1721(h)*	Submit evidence from the Registered Professional Engineer/firm of the well abandonment design and procedures; plugs in the annuli meet requirements of § 250.1715; 2 independent barriers etc; has the expertise and experience necessary to perform the verification(s), submit with the APM.	1	200	200

	<b>Total Q</b>	<b>1,388 responses</b>	<b>3,897 hours</b>
<b>Grand Total</b>		<b>2,663 Responses</b>	<b>5,347 Hours</b>

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

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>.

<b>Position</b>	<b>Level</b>	<b>Hourly Pay rate (\$/hour estimate)</b>	<b>Hourly rate including benefits (1.4** x \$/hour)</b>	<b>Percent of time spent on collection</b>	<b>Weighted Average (\$/hour)</b>
Secretaries and Administrative assistants	6	\$21	\$29	10%	\$3
Management***	13	\$64	\$90	40%	\$36
Petroleum Engineers /Geologists	All Workers	\$68	\$95	50%	\$48
Supv. Engineer	15	\$68	\$95	5%	\$5
<b>Weighted Average (\$/hour)</b>					<b>\$92</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 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 \$491,924 (\$92 x 5,347 hours = \$491,924).

**13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in Item 12.)**

*(a) The cost estimate should be split into two components: (1) a total capital and start-up cost component (annualized over its expected useful life) and (2) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.*

*(b) If cost estimates are expected to vary widely, agencies should present ranges of cost burden and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates,*

*agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.*

*(c) Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.*

We have identified no paperwork non-hour cost burdens for this collection of information.

**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, the Government spends an average of 0.5 hours for each hour spent by respondents. The total estimated Government time is 2,674 (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/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)
Clerical	GS-6/5	\$19	\$29	4%	\$1
Technician(s)	GS-11/5	\$31	\$47	25%	\$12
Engineer(s)	GS-13/5	\$44	\$66	65%	\$43
Supervisory	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 10-1687, December 10, 2010 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

Based on a cost factor of \$61 per hour, the total annual estimated burden on the Government is \$163,114 (5,347 hours x .5 hours = 2,674 x \$61 = \$163,114).

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

This submission requests a program increase of 5,347 burden hours for a new IC associated with new regulations.

As stated in item A.1, when final regulations take effect, we will merge these burdens into their primary subparts – Subpart D – 1014-0018; Subpart E – 1014-0004; Subpart F – 1014-0001, and Subpart Q – 1014-0010, respectively.

**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.***

Not applicable. BSEE will post the OMB control number and expiration date.

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