

Supporting Statement A
30 CFR 250, Subpart Q, Decommissioning Activities
OMB Control Number 1014-0010
OMB Expiration Date: December 31, 2013

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.

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 that 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."

In addition to the general rulemaking authority of the OCSLA at 43 U.S.C. 1334, section 301(a) of the Federal Oil and Gas Royalty Management Act (FOGRMA), 30 U.S.C. 1751(a), grants authority to the Secretary to prescribe such rules and regulations as are reasonably necessary to carry out FOGRMA's provisions. While the majority of FOGRMA is directed to royalty collection and enforcement, some provisions apply to offshore operations. For example, section 108 of FOGRMA, 30 U.S.C. 1718, grants the Secretary broad authority to inspect lease sites for

the purpose of determining whether there is compliance with the mineral leasing laws. Section 109(c)(2) and (d)(1), 30 U.S.C. 1719(c)(2) and (d)(1), impose substantial civil penalties for failure to permit lawful inspections and for knowing or willful preparation or submission of false, inaccurate, or misleading reports, records, or other information. Because the Secretary has delegated some of the authority under FOGRMA to BSEE, 30 U.S.C. 1751 is included as additional authority for these requirements.

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. Respondents pay cost recovery fees when removing a platform or other facility, or for decommissioning a pipeline lease term or a right-of-way.

This authority and responsibility are among those delegated to the Bureau of Safety and Environmental Enforcement (BSEE). The regulations at 30 CFR 250, Subpart Q, concern decommissioning of platforms, wells, and pipelines, as well as site clearance and platform removal and are the subject of this collection. This request also covers the related Notices to Lessees and Operators (NTLs) that BSEE issues to clarify, supplement, or 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.

The BSEE uses the information collected under Subpart Q primarily for the following reasons:

- To determine the necessity for allowing a well to be temporarily abandoned, the lessee/operator must demonstrate that there is a reason for not permanently plugging the well, and the temporary abandonment will not interfere with fishing, navigation, or other uses of the OCS. We use the information and documentation to verify that the lessee/operator is diligently pursuing the final disposition of the well and has performed the temporary plugging of the wellbore.
- The information submitted in initial decommissioning plans in the Alaska and Pacific OCS Regions will permit BSEE to become involved on the ground floor planning of platform removals anticipated to occur in these OCS regions.
- Site clearance and platform or pipeline removal information ensures that all objects (wellheads, platforms, etc.) installed on the OCS are properly removed using procedures that will protect marine life and the environment during removal operations, and the site cleared so as not to conflict with or harm other uses of the OCS.
- Information regarding decommissioning a pipeline in place is needed to ensure that it will not constitute a hazard to navigation and commercial fishing operations, unduly interfere with other uses of the OCS, or have adverse environmental effects.

- The information is necessary to verify that decommissioning activities comply with approved applications and procedures and are satisfactorily completed.
- The information is used to evaluate and approve the adequacy of the equipment, materials, and/or procedures that the lessee or operator plans to use during well modifications and changes in equipment, etc.

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, 60 percent of information is submitted electronically.

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

The information collected is unique to each lease, and similar information is not available from other sources. The DOI and other Government agencies have Memoranda of Understanding that defines 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 could have a significant economic effect on a substantial number of small entities. Any direct effects primarily impact the OCS lessees and operators. However, many of the OCS lessees and operators may have less than 500 employees and would be considered small businesses as defined by the Small Business Administration. With respect to the requirements for site clearance of abandoned wells, if these activities were not performed, it is more likely that other users of the OCS would be adversely affected, many of which are small businesses. 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 collection of information cannot be reduced to accommodate them.

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, we could not ascertain: (a) the intent of the lessee/operator; (b) if respondents are diligently pursuing the final disposition of a well, platform, or pipeline; (c) if the lessee/operator has documented the temporary plugging of the well and has marked the

location; or (d) that site clearance and removal operations are performed in an environmentally safe and effective manner.

Information is collected on occasion or varies by section depending on the requirement, except for annual reporting on temporary abandonment of wells until the lessee/operator re-enters to complete or to permanently plug the well. The annual report is the minimum frequency necessary to ensure the diligent pursuit of the final well disposition.

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;

- § 250.1705(e). The BSEE requires notification at least 72 hours prior to shearing ram tests to witness testing, inspections, and information verification.
- § 250.1713. The BSEE requires notification within 48 hours before beginning well plugging and abandonment operations in order to have the option of scheduling BSEE personnel to observe operations on site to ensure they are conducted in accordance with applicable regulations and approved procedures.
- § 250.1722(c). The BSEE requires notification within 5 days in the event a trawl hangs up on (or damages) a protective device (dome) over a subsea wellhead or casing stub in order to ensure that repairs are initiated as soon as possible to eliminate or minimize the possibility that shrimp boats will hang up on the obstruction and cause damage to their nets. It allows BSEE to notify other users of the OCS of the obstruction in a timely manner, thereby reducing the risk to their equipment.
- § 250.1725(e). The BSEE requires notification within 48 hours before beginning platform removal operations in order to have the option of scheduling BSEE personnel to observe removal operations on site in the field to ensure that they are conducted in accordance with applicable regulations and approved procedures for the use of explosives, removal of platform piling to 15 feet below the seafloor, proper site clearance, etc.

(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;

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;

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
Not applicable in this collection.

(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.
Not applicable in this collection.

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** on May 21, 2013 (78 FR 29772). Also, 30 CFR 250.199 explains that BSEE 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 one comment in response to the **Federal Register** notice, but it was not germane to the paperwork burden associated with this collection.

To prepare this information collection renewal request, companies were contacted to determine the estimated burden this subpart places on respondents: The following company representatives that commented were:

- Anadarko Petroleum Corporation, Teri Powell, Regulatory Analyst, (832) 636-1261, P.O. Box 1330, Houston, Texas 77251
- Apache Corporation, Cheryl Powell, Regulatory Manager, (713) 296-6811, 2000 West Sam Houston Parkway South, Suite 1000, Houston, Texas 77042
- Energy XXI, Kay Morgan, Regulatory Manager, (713) 351-3048, 1021 Main Street, Suite 2626, Houston, Texas 77002

All the different reporting and recordkeeping requirements that are listed in the following Subpart Q burden table (Section A.12) were thoroughly reviewed by the company representatives listed. These representatives had no concerns regarding the availability of data, frequency of collection, clarity of instructions, and elements being collected at this time. The companies that replied provided the burden estimates that are reflected in Section A.12.

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

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

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

The BSEE will 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 questions of a sensitive nature.

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

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

complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

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

Potential respondents include Federal OCS oil, gas, and sulphur lessees and holders of pipeline rights-of-way. It should be noted that not all of the potential respondents will submit information in any given year and some may submit multiple times. The burden estimates include the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information and are based on informal discussions with the listed respondents in Section A.8. Submissions are generally on occasion, varies by section, and annual. Responses are mandatory. We estimate the total annual burden is 29,437 hours. Refer to the following table for a breakdown of the burdens.

L/T = Lease Term		Burden Breakdown			ROW = Right of Way	
Citation 30 CFR 250 Subpart Q	Reporting Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (Rounded)		
		Non-Hour Cost Burdens				
General						
1700 thru 1754	General departure and alternative compliance requests not specifically covered elsewhere in Subpart Q regulations.	4	175 requests	700		
1703; 1704	Request approval for decommissioning.	Burden included below.		0		
1704(g); 1707(d); 1712; 1715; 1716; 1717; 1721(a), (d), (f), (g); 1722(a), (b), (d); 1723(b); 1743(a)	Submit form BSEE-0124 to plug wells; provide subsequent report; request alternate depth departure; request procedure to protect obstructions above seafloor; report within 30 days, results of trawling; certify area cleared of obstructions; remove casing stub or mud line suspension equipment and subsea protective covering; other departures; and all supporting or additional information required.	Burden covered under 1014-00181.		0		
1705	Submit a description of your blowout preventer (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.	29	250 submittals	7,250		
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	0.5	10 submittals	5		

Citation 30 CFR 250 Subpart Q	Reporting Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (Rounded)
		Non-Hour Cost Burdens		
	tests.			
1706(a)	Request approval of well abandonment operations; procedures indicating how the annular preventer will be utilized and how pressure limitations will be applied during each mode of pressure control, with your APM.	0.5	250 requests	125
1706(f)(4)	Request approval of the District Manager to conduct operations without downhole check values; describe procedures/equipment in APM.	1	20 requests	20
1707(a) (2)	Request approval from District Manager to test all BOP system components to rated working pressure; annular BOP less than 70 percent rated working pressure.	0.5	10 requests	5
1707(b) (2)	State reason for postponing test in operations logs.	0.5	30 responses	15
1707(b) (2)	Request approval from District Manager for alternate test frequencies if condition/BOP warrant.	0.75	10 requests	8
1707(f)	Request alternative method to record test pressures.	0.5	20 requests	10
1707(f)	Record test pressures during BOP and coiled tubing on a pressure chart or w/digital recorder; certify charts are correct.	1	250 records/ certifications	250
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.	1	250 records	250
1707(h) (1)	Submit test procedures with your APM for District Manager approval.	1	75 submittals	75
1707(h) (1)(ii)	Document all ROV intervention test results; make available to BSEE upon request.	0.5	75 records	38
1707(h) (2)(ii)	Document all autoshear and deadman function test results; make available to BSEE upon request.	0.5	75 records	38
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	75 records	75
1708(a)	Request alternative method to inspect marine risers.	0.5	5 requests	3
1709	Request approval from the District Manager to displace kill-weight fluids in an unbalanced state; submit detailed written procedures with your APM.	2.5	40 requests	100
Subtotal			1,620 responses	8,967 hours

Citation 30 CFR 250 Subpart Q	Reporting Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (Rounded)
		Non-Hour Cost Burdens		
Permanently Plugging Wells				
1711	Required data if permanently plugging a well.	Requirement not considered Information Collection under 5 CFR 1320.3(h)(9).		0
1712; 1721(h)	Submit with your APM all documentation for this requirement; 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.	1.5	250	375
1713	Notify BSEE 48 hours before beginning operations to permanently plug a well.	0.5	700 notices	350
Subtotal			950 responses	725 hours
Temporary Abandoned Wells				
1721(e); 1722(e), (h)(1); 1741(c)	Identify and report subsea wellheads, casing stubs, or other obstructions; mark wells protected by a dome; mark location to be cleared as navigation hazard.	U.S. Coast Guard requirements.		0
1722(c), (g)(2)	Notify BSEE within 5 days if trawl does not pass over protective device or causes damages to it; or if inspection reveals casing stub or mud line suspension is no longer protected.	1	10 notices	10
1722(f), (g)(3)	Submit annual report on plans for re-entry to complete or permanently abandon the well and inspection report.	2.5	95 reports	238
1722(h)	Request waiver of trawling test.	1.5	5 requests	8
Subtotal			110 responses	256 hours
Removing Platforms and Other Facilities				
1726; 1704(a)	Submit initial decommissioning application in the Pacific and Alaska OCS Regions.	20	2 applications	40
1725; 1727; 1728; 1730; 1704(b)	Submit final application and appropriate data to remove platform or other subsea facility structures (including alternate depth departure) or approval to maintain, to conduct other operations, or to convert to artificial reef.	28	327 applications	9,156
		\$4,342 fee x 327 = \$1,419,834*		
1725(e)	Notify BSEE 48 hours before beginning removal of platform and other facilities.	0.5	277 notices	139
1729; 1704(c)	Submit post platform or other facility removal report; supporting documentation; signed statements, etc.	9.5	277 reports	2,632
1731(c)	Request deferral of facility removal subject to RUE issued under 30 CFR 556.	1.75	50 request.	88
Subtotal			933 responses	12,055 hours

Citation 30 CFR 250 Subpart Q	Reporting Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (Rounded)
			\$1,419,834	
Non-Hour Cost Burdens				
Site Clearance for Wells, Platforms, and Other Facilities				
1740; 1741(g)	Request approval to use alternative methods of well site, platform, or other facility clearance; contact pipeline owner/operator before trawling to determine its condition.	12.75	75 requests /contact	956
1743(b); 1704(f)	Verify permanently plugged well, platform, or other facility removal site cleared of obstructions; supporting documentation; and submit certification letter.	5	299 verifications	1,495
Subtotal			374 responses	2,451 hours
Pipeline Decommissioning				
1750; 1751; 1752; 1754; 1704(d)	Submit application to decommission pipeline in place or remove pipeline (L/T or ROW).	7.75	530 applications	4,108
		\$1,059 L/T decommission fee x 350 = \$370,650*		
		\$2,012 ROW decommission fee x 180 = \$362,160*		
1753; 1704(e)	Submit post pipeline decommissioning report.	2.5	350 reports	875
Subtotal			880 responses	4,983 hours
			\$732,810 non-hour cost burdens	
Total Burden			4,867 Responses	29,437 hours
			\$2,152,644* Non-Hour Cost Burdens	

* Cost recovery monies collected are based on actual submittals through Pay.gov for FY 2012.

(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 \$87*/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	15%	\$4

Petroleum Engineers, Geologists	All Workers	\$68	\$95	70%	\$67
Supv. Engineer	13	\$76	\$106	15%	\$16
Weighted Average (\$/hour)					\$87

* Note that this BLS source reflects their last update from March 2013.

** A multiplier of 1.4 (as implied by BLS news release USDL 13-1140, June 12, 2013 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

Based on a cost factor of \$87 per hour, we estimate the hour burden as a dollar equivalent is \$2,561,019 (\$87 x 29,437 hours = \$2,561,019).

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 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.

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.

We have identified three non-hour paperwork cost burdens for this collection. Respondents pay cost recovery fees when removing a platform or other facility under § 250.1727 for \$4,342, or for decommissioning a pipeline under § 250.1751(a) – L/T for \$1,059 or a ROW for \$2,012. The fees are required to recover the Federal Government's processing costs, and we have not identified any others. We estimate a total reporting non-hour cost burden of \$2,152,644 for this

collection. Refer to the table in Section A.12 of this supporting statement for the specific non-hour paperwork cost burden breakdown.

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 \$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/13tables/>).

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	GS-14/5	\$53	\$80	6%	\$5
Weighted Average (\$/hour)					\$61

* A multiplier of 1.5 (as implied by BLS news release USDL 13-1140, June 12, 2013 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

To analyze and review the information respondents submit for Subpart Q, we estimate the Government will spend an average of approximately 0.5 hours for each hour spent by respondents. Based on a cost factor of \$61 per hour, the total annual estimated burden on the Government is \$897,859 (29,437 burden hours x 0.5 hours = 14,719 hours (rounded) x \$61 = \$897,859).

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

(a) The currently OMB approved annual hour burden is 19,613 burden hours for this collection of information. This submission requests 29,437 burden hours. The adjustment increase of 9,824 hours is due to re-estimating the average annual responses and the amount of time required to respond based on consultations.

(b) The currently OMB approved annual reporting and recordkeeping non-hour cost burden is \$1,677,782 for this collection of information. This submission requests \$2,152,644. The adjustment increase of \$474,862 is due to re-estimating the average number of annual responses that have associated cost recovery fees.

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

The 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.

The BSEE will display the OMB control number and approval 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.”