

Supporting Statement A

OMB Control Number 1010-0006

Expiration: March 31, 2014

**30 CFR Part 556, Leasing of Sulphur or Oil and Gas in the OCS
(BOEM-0150, BOEM-0151, BOEM-0152, BOEM-2028, and BOEM-2028A)**

**30 CFR 550, Subpart J, Pipelines and Pipeline Rights-of-Way
(BOEM-2030)**

30 CFR Part 560, OCS Oil and Gas Leasing

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 (Secretary) to prescribe rules and regulations to administer leasing of the OCS. Such rules and regulations apply to all operations conducted under a lease. 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; balance orderly energy resource development with protection of human, marine, and coastal environments; ensure the public a fair and equitable return on the resources of the OCS; and preserve and maintain free enterprise competition. Also, the Energy Policy and Conservation Act of 1975 (EPCA) prohibits certain lease bidding arrangements (42 U.S.C. 6213 (c)).

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 provide special benefits. Under the Department of the Interior's policy implementing this Act, the Bureau of Ocean Energy Management (BOEM) is required to charge the full cost for services that provide special benefits or privileges to an identifiable non-Federal

recipient above and beyond those that accrue to the public at large. Instruments of transfer of a lease or interest are subject to cost recovery, and BOEM regulations specify the filing fee for these transfer applications.

These authorities and responsibilities are among those delegated to BOEM under which we issue regulations governing oil and gas and sulphur operations in the OCS. This information collection request (ICR) addresses the regulations at 30 CFR 556, Leasing of Sulphur or Oil and Gas in the OCS; 30 CFR 550, Subpart J, Pipelines and Pipelines Rights-of-Way; and 30 CFR 560, Outer Continental Shelf Oil and Gas Leasing; and the associated supplementary Notices to Lessees and Operators (NTLs) intended to provide clarification, description, or explanation of these regulations. This ICR also concerns the use of forms to process bonds, transfer interest in leases, and file relinquishments.

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.

BOEM uses the information required by 30 CFR 556 to determine if applicants are qualified to hold leases in the OCS. Specifically, BOEM uses the information to:

- Verify the qualifications of a bidder on an OCS lease sale. Once the required information is filed with BOEM, a qualification number is assigned to the bidder so that duplicate information is not required on subsequent filings.
- Develop the semiannual List of Restricted Joint Bidders. This identifies parties ineligible to bid jointly with each other on OCS lease sales, under limitations established by the Energy Policy and Conservation Act.
- Ensure the qualification of assignees and track operators on leaseholds. Once a lease is awarded, the transfer of a lessee's interest to another qualified party must be approved by a BOEM Regional Director or Regional Supervisor. Also, a lessee may designate an operator to act on the lessee's behalf. This designation must be approved by BOEM before the designated operator may begin operations.
- Document that a leasehold or geographical subdivision has been surrendered by the record title holder.

BOEM will use this information to update the corporate database which is used to determine what leases are available for a lease sale and the ownership of all OCS leases. Non-proprietary information is also publicly available from the BOEM corporate database via the internet.

BOEM uses the information required by subpart J - Assignments, Transfers and Extensions, to track the ownership of leases as to record title, operating rights, and pipeline right-of-ways.

BOEM also uses various forms relating to this subpart. The forms allow lessees to submit the required information in a standardized format that helps BOEM process the data in a more timely and efficient manner.

BOEM provides the same instruction sheet for forms BOEM-0150 and BOEM-0152. It is important for respondents to follow the instruction sheet guidelines so that they provide all the pertinent information to BOEM. If all pertinent information is not provided, the assignment may not be approved.

Form BOEM-0150 – Assignment of Record Title Interest in Federal OCS Oil and Gas Lease

Form BOEM-0151 – Assignment of Operating Rights Interest in Federal OCS Oil and Gas Lease

These forms ask the lessee to fill in:

Part A – Assignment

- the lease number
- the lease effective date
- the legal description of land/area being assigned (for Form BOEM-0150) or legal description of the operating rights assigned (for Form BOEM-0151)
- the company name and number of each assignor and assignee,
- the percentage interest conveyed for each assignor and assignee, and
- the percentage interest received for each assignor and assignee.

Part B – Certification and Acceptance

- the effective date of the assignment,
- the company name and number of each assignor and assignee,
- the name and title of each signatory for each assignor and assignee, and
- the execution date of each signature.

BOEM has a brief statement on each form explaining that once this form is filed, the lessee has executed their assignment in the lease. BOEM then signs and dates the form if it has been approved.

Under subpart K, Termination of Leases, this information will be used to track the lease status as to ownership and whether the lease has been relinquished and available for the next lease sale. A company may relinquish a lease when a company determines that it no longer wishes to hold an interest in same.

Lease ownership and status information are extremely important to the oil and gas industry as they strategize long-range planning for oil and gas development and the sharing of the expense and liabilities of OCS offshore drilling and development.

Form BOEM-0152 – Relinquishment of Federal OCS Oil and Gas Lease Form

The form asks the respondent for:

- a legal description of the lease/officially designated subdivision being relinquished,
- company name and number of each lessee,
- name and title of each signatory for each lessee, and
- execution date of each signature.

BOEM has a brief statement on the form explaining that once this form is filed, the lessee has relinquished their interest in the lease. When the form has been filed in the appropriate BOEM office, it will become effective on that date, if it is deemed acceptable.

Form BOEM-2028 – Outer Continental Shelf (OCS) Minerals Lessee's and Operator's Bond

The form asks the respondent for:

- the surety company information,
- the principal's name and address for whom the bond is issued,
- the areas and leases covered by the bond,
- what obligations the surety accepts, and
- principal and surety signature information and witnessed.

Form BOEM 2028A – Outer Continental Shelf (OCS) Mineral Lessee's and Operator's Supplemental Bond

The form asks the respondent for:

- the surety company information,
- the principal's name and address for whom the bond is issued,
- the areas and leases covered by the bond,
- what obligations the surety accepts, and
- principal and surety signature information and witnessed.

BOEM uses these last two forms to hold the surety liable for the obligations and liability of the principal/lessee or operator.

BOEM uses the information collected under 30 CFR 550, Subpart J, to ensure compliance with Federal regulations by the surety and ROW holder guaranteeing that funds be made available to complete existing and future obligations.

Form BOEM-2030 – OCS Pipeline Right-of-Way Grant Bond, consists of either fill in the blanks or check boxes concerning:

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

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.

BOEM is phasing in a web-based system to allow electronic filing of lessee qualification and bonding information in the Gulf of Mexico Region (GOMR), which receives the majority of submissions. As yet, no information has been received through the system, but we expect burdens for the bonding process to decrease in the future since the web-based system will prepopulate certain fields and electronically route

the bond for electronic signatures before submitting to BOEM. We expect this system to enable BOEM to process requests quicker and provide faster response/approval for industry.

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.

No similar information pertaining to leasing in the OCS is collected by the Department of the Interior or other Federal agencies. Qualification and application files are maintained in regional offices to avoid duplicative information collection from respondents who have already filed evidence of their qualifications.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This collection of information may have an economic effect on a number of small entities. In general, companies need large technical and financial resources and experience to conduct offshore activities safely. Any direct effects primarily impact the OCS lessees and operators. Many of these OCS lessees and operators have less than 500 employees and are 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 and the potential benefit of obtaining and retaining a lease far outweighs the burden.

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 BOEM did not collect the information, we could not carry out the mandates of the OCS Lands Act and the Energy Policy and Conservation Act. In the case of information regarding the individual sale proposals, the time lapse between actions is sufficient for circumstances to change and for new data to become applicable. We request qualification papers only in conjunction with a scheduled sale (GOMR). Corporate information must be up-to-date for each action for BOEM to determine the qualification of bidders. Information is not available to use in lieu of that supplied for each action. Information pertaining to the initiation of sales is requested annually in the central and western Gulf of Mexico planning areas and every 2 to 5 years in the other regional planning areas. If BOEM collected the information less frequently, the OCS leasing program would not be able to adequately provide for the interests of potential lessees and of other users of the OCS.

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;

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

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), BOEM published a 60-day review and comment notice in the *Federal Register* on November 4, 2013 (78 FR 66066). Also, 30 CFR 556.0 and the Paperwork Reduction Act statement on BOEM forms explain that BOEM will accept comments at any time on the information collection requirements and burdens. We display the OMB control numbers and provide the address for sending comments to BOEM. We received one comment in response to the *Federal Register* notice, but it was not relevant to the information collection request.

During the comment period, BOEM regional offices consulted with the following respondents to verify the accuracy of our burden estimates. Their responses are reflected in the estimates in the burden table in No. 12. No one provided comment or input on the availability of data, frequency of collection, clarity of instructions, and elements being collected.

LLOG Exploration Company
1001 Ochsner Blvd., Suite 200
Covington, Louisiana 70433
(985) 801-4755

Senior Landman
Freeport-McMoRan Oil & Gas
1615 Poydras Street
New Orleans, LA 70112
Phone: (504) 582-4839

Senior Land Technician
W & T Offshore, Inc.
Nine Greenway Plaza #300
Houston, TX, 77046
+1 713 624 7218 (direct)

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

BOEM does not provide payments or gifts to respondents.

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

The individual responses to Calls for Information are the only information collected involving the protection of confidentiality. BOEM will protect specific individual replies from disclosure as proprietary information according to section 26 of the OCS Lands Act, the Freedom of Information Act (5 U.S.C. 552) and its implementing regulations (43 CFR part 2), 30 CFR 556.10(d), and under 30 CFR 560, § 550.197, Data and information to be made available to the public or for limited inspection.

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

The collection does not include 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.

BOEM estimates that potential respondents comprise Federal oil and gas or sulphur lessees and/or 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 frequency of response is mostly on occasion. We estimate the total annual burden is 17,882 hours based on previous discussions with respondents. Refer to the chart below for a breakdown of the burden.

BURDEN BREAKDOWN

Citation 30 CFR Part 556 and NTLs	Reporting Requirement*	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
		Non-Hour Cost Burdens**		
All Subparts				
Subparts A, C, E, H, L, M	None.	Not applicable.		0
Subparts G, H, I, J: 37; 53; 68; 70; 71; 72; 73	Request approval for various operations or submit plans or applications.	Burden included with other approved collections in 30 CFR Part 550 (Subpart A 1010-0114, Subpart B 1010-0151) and in BSEE 30 CFR 250 (Subpart A 1014-0022, Subpart D 1014-0018).		0
Subparts B through F				
Subpart B: All sections	Submit general suggestions and relevant information in response to request for comments on proposed 5-year leasing program, including information from States/local governments.	Not considered IC as defined in 5 CFR 1320.3(h)(4).		0
	Submit suggestions and specific information in response to request for comments on proposed 5-year leasing program, including information from States/local governments. ***	4	69	276
Subpart D: All sections	Submit general response to Call for Information and Nominations on areas for leasing of minerals in specified areas in accordance with an approved leasing program, including information from States/local governments.	Not considered IC as defined in 5 CFR 1320.3(h)(4).		0
	Submit specific response to Call for Information and Nominations on areas for leasing of minerals in specified areas in accordance with an approved leasing program, including information from States/local governments. ***	4	80 (20 responses/sale x 2 sales/call x 2 calls/year)	320
Subpart F: 31	States or local governments submit comments/recommendations on size, timing or location of proposed lease sale.	4	25 responses	100
Subtotal			174 responses	696 hours
Subpart G				
Subpart G: 35; 46(d), (e)	Establish a Company File for pre-qualification; submit updated information, submit qualifications for lessee/bidder, request exception.	2	107 responses	214
41; 43; 46(g)	Submit qualification of bidders for joint bids and statement or report of production, along with supporting information/appeal.	2	100 responses	200
44; 46; 47	Submit bids and required information, including GDIS & maps in manner specified. Make available to BOEM.	5	2,000 bids	10,000
47(c)	File agreement to accept joint lease on tie bids.	3 1/2	2 agreements	7
47(e)(1), (e)(3)	Request for reconsideration of bid rejection.	Not considered IC as defined in		0

Citation 30 CFR Part 556 and NTLs	Reporting Requirement*	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
		Non-Hour Cost Burdens**		
		5 CFR 1320.3(h)(9).		
47(f), (i); 50	Execute lease (includes submission of evidence of authorized agent and request for dating of leases; lease stipulations).	1	852 leases	852
		Subtotal	3,061 responses	11,273 hours
Subpart I				
Subpart I: 52(f)(2), (g)(2)	Submit authority for Regional Director to sell Treasury or alternate type of securities.	2	12 submissions	24
53(a), 53(b); 54	OCS Mineral Lessee's and Operator's Bond (Form BOEM-2028).	1/3	135 responses	45 (rounded)
53(c), (d), (f); 54(e)	Demonstrate financial worth/ability to carry out present and future financial obligations, request approval of another form of security, or request reduction in amount of supplemental bond required.	3 1/2	166 submissions	581
54	OCS Mineral Lessee's and Operator's Supplemental Plugging & Abandonment Bond (Form BOEM-2028A).	1/4	141 responses	35
55	Notify BOEM of any lapse in previous bond/action filed alleging lessee, surety, or guarantor is insolvent or bankrupt.	1	4 notices	4
56	Provide plan/instructions to fund lease-specific abandonment account and related information; request approval to withdraw funds.	12	2 submission	24
57	Provide third-party guarantee, indemnity agreement, financial information, related notices, reports, and annual update; notify BOEM if guarantor becomes unqualified.	19	46 submissions	874
57(d)(3); 58	Notice of and request approval to terminate period of liability, cancel bond, or other security.	1/2	378 requests	189
59(c)(2)	Provide information to demonstrate lease will be brought into compliance.	16	5 responses	80
		Subtotal	889 responses	1,856 hours
Subpart J				
Subpart J: 62; 63; 64; 65; 67	File application and required information for assignment or transfer for approval/comment on filing fee (Forms BOEM-0150 and BOEM-0151).	2 forms @ 30 min ea = 1 hr	1,414 applications/ forms	1,414
		1,414 Title/Rights (Transfer) Assignments @ \$198 = \$279,972		
63; 64(a)(8)	Submit non-required documents, for record purposes, which respondents want BOEM to file with the lease document. [Accepted on behalf of lessees as a service, BOEM does not require nor need the filings.]	0	11,518 documents	0
		11,518 @ \$29 = \$334,022		
64(a)(7)	File required instruments creating or transferring working interests, etc., for record purposes.	1	2,369 filings	2,369
		Subtotal	15,301 responses	3,783 hours
		\$613,994 non-hour cost burdens		
Subpart K				
Subpart K: 76; 92(a)	File written request for relinquishment (Form BOEM-152).	1	247 relinquish- ments	247
77(c)	Comment on lease cancellation (BOEM expects 1 in 10 years).	1	1 comment	1
		Subtotal	248 responses	248 hours
Subpart N				
Subpart N: 92(a)	Request a bonus or royalty credit; submit supporting documentation.	1	1 request	1

Citation 30 CFR Part 556 and NTLs	Reporting Requirement*	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
		Non-Hour Cost Burdens**		
95	Request approval to transfer bonus or credit to another party; submit supporting information.	1	1 request	1
		Subtotal	2 responses	2 hours
30 CFR 550 Subpart J	Reporting Requirement*	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
550.1011(a)	Provide surety bond (Form BOEM-2030) and required information.	GOM 1/4	52 forms	13
		Pacific 3 1/2	3 forms	11
30 CFR 550, Subpart J TOTAL			55 responses	24 hours
Citation 30 CFR Part 560	Reporting Requirement*	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
124(a)	Request BOEM to reconsider field assignment of a lease.	Exempt under 5 CFR 1320.4(a) (2), (c).		0
TOTAL REPORTING		19,730 Responses		17,882 Hours
		\$613,994 Non-Hour Cost Burdens		

* In the future, BOEM may require electronic filing of certain submissions.

** Fees are subject to modifications annually per inflation.

*** Existing requirement, previously overlooked.

(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 the Federal Government.”

Due to the fact that many of the requirements submitted to BOEM require a company’s President, Vice President, etc., signatures along with witnesses for surety guarantees, we have added in, based on our experience of industry’s salary for company Presidents, \$125 per hour for this IC.

Therefore, the average respondent cost is \$81/hour (rounded). This cost is broken out in the below table using the Bureau of Labor Statistics data for the Houston, TX area; plus, the hourly pay rate obtained directly from the respondents. See BLS website: <http://www.bls.gov/bls/wages.htm>.

Position	Level	Hourly Pay rate (\$/hour * estimate/rounded)	Hourly rate including benefits (1.4** x \$/hour/rounded)	Percent of time spent on collection	Weighted Average (\$/hour)
Administrative	7	\$21	\$29	5%	\$1
Risk Analyst***	13	\$45	\$63	30%	\$19
Lease Analyst***	13	\$59	\$83	50%	\$42
Land/Risk Manager***	15	\$70	\$98	10%	\$10
President/Vice President		\$125	\$175	5%	\$9
Weighted Average (\$/hour)					\$81

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

** A multiplier of 1.4 (as implied by BLS news release USDL 13-2349, December 11, 2013 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

*** Hourly pay rate/title obtained directly from respondents.

Based on a cost factor of \$81 per hour, we estimate the total annual cost to industry is \$1,448,442 (\$81 x 17,882 hours = \$1,448,442).

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.

Sections 556.63 and 556.64 require respondents to pay service fees when submitting a request for assignment of record title interest, assignment of operating rights interest (\$198), and to file documents for record purposes (\$29). The service fees are required to recover the Federal Government's processing costs and reflect the recent adjustment for inflation that became effective February 2, 2013 (78 FR 5836; 1/28/13). We have not identified any other non-hour cost burdens associated with this collection of information, and we estimate a total reporting non-hour cost burden of \$613,994. Refer to the chart in Section A.12 of this supporting statement for the specific fee breakdown. Note that fees are subject to modifications annually per inflation.

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 \$42/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 area. To analyze and review the information respondents submit, we estimate the Government will spend an average of approximately 1.4 hours for each hour spent by respondents. The total estimated Government time is 25,035 hours (rounded) (1.4 x 17,882 = 25,035).

Position	Grade	Hourly Pay rate (\$/hour estimate/rounded)	Hourly rate including benefits (1.5* x \$/hour/rounded)	Percent of time spent on collection	Weighted Average (\$/hour)
Contact Representative	GS-6/5	\$19	\$29	10%	\$3
Adjudication Asst(s)	GS-7/5	\$21	\$32	20%	\$6
Program Specialist	GS-12/5	\$38	\$57	5%	\$3
Mineral Leasing Asst(s)	GS-9/5	\$26	\$39	20%	\$8
Land Law Examiner(s)	GS-11/5	\$31	\$47	40%	\$19
Supervisor	GS-13/5	\$45	\$68	5%	\$3
Weighted Average (\$/hour)					\$42

*A multiplier of 1.5 (as implied by BLS news release USDL 13-2349, December 11, 2013, see <http://www.bls.gov/news.release/ecec.nr0.htm>) was added for benefits

Based on a cost factor of \$42 per hour, the cost to the Government is \$1,051,470 (\$42 x 25,035 hours).

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

This ICR requests adjustments to both the hour burden and the non-hour cost burdens.

(a) Hour Burden: We are reporting 17,882 burden hours, which is an increase of 2,127 hours from the previous submission. We made an adjustment increase of 1,531 hours as a result of reestimating the number of annual responses. We are reporting as a program change an increase of 596 hours for two regulatory requirements in Subparts B and D (see table in item 12) that were overlooked and not included in our previous submission.

(b) Non-Hour Cost Burdens: The currently approved OMB inventory is \$393,345 in non-hour burden costs. This submission requests an adjustment **increase** of \$220,649 for a total of \$613,994. The increase is due to a change in the number of respondents and the adjustment in fees for inflation in accordance with a previously approved fee schedule.

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.

BOEM 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.

We will display the OMB control number and expiration date on the forms and other appropriate material.

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

To the extent that the topics apply to this collection of information, we are not making any exceptions to

the “Certification for Paperwork Reduction Act Submissions.”