

Supporting Statement A
30 CFR Part 250, Application for Permit to Modify (APM) and supporting documentation
Form – BSEE-0124
OMB Control Number 1014-NEW
Current Expiration Date: NEW

Terms of Clearance: None.

General Instructions

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question, “Does this information collection request (ICR) contain surveys, censuses, or employ statistical methods?” is checked "Yes," then a Supporting Statement B must be completed. The Office of Management and Budget (OMB) reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

Justification

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

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.”

In addition to the general authority of OCSLA, 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. The Secretary has

delegated some of the authority under FOGRMA to BSEE.

The Independent Offices Appropriations Act (31 U.S.C. 9701), the Omnibus Appropriations Bill (Pub. L. 104-133, 110 Stat. 1321, April 26, 1996), and OMB Circular A-25, authorize Federal agencies to recover the full cost of services that confer special benefits. Under the Department of the Interior's implementing policy, the Bureau of Safety and Environmental Enforcement (BSEE) is required to charge fees for services that provide special benefits or privileges to an identifiable non-Federal recipient above and beyond those which accrue to the public at large. Applications for Permit to Modify (APMs) are subject to cost recovery and BSEE regulations specify a service fee for this request.

These authorities and responsibilities are among those delegated to the Bureau of Safety and Environmental Enforcement (BSEE). The regulations at 30 CFR 250 stipulate the various requirements that must be submitted with an APM. The form and the numerous submittals that are included and/or attached to the form are the subject of this collection. Currently, this information is collected under 30 CFR 250, Subpart D, 1014-0018 (216,211 hour burdens/\$2,225,286 non-hour cost burdens; expiration 10/21/2014); but this request will separate out the hours and non-hour cost burdens associated with APMs into its own separate collection so that both industry and BSEE have a better understanding of the complexities associated with all the information that is submitted with this form; and will reflect more accurate burden estimates.

This request also covers any 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 to ensure safe well completion, workover, and decommissioning operations and to protect the human, marine, and coastal environment. Among other things, BSEE specifically uses the information to ensure: the well completion, workover, and decommissioning unit (drilling/well operations) is fit for the intended purpose; equipment is maintained in a state of readiness and meets safety standards; each drilling/well operation crew is properly trained and able to promptly perform well-control activities at any time during well operations; compliance with safety standards; and the current regulations will provide for safe and proper field or reservoir development, resource evaluation, conservation, protection of correlative rights, safety, and environmental protection. We also review well records to ascertain whether the operations have encountered hydrocarbons or H₂S and to ensure that H₂S detection equipment, personnel protective equipment, and training of the crew are adequate for safe operations in zones known to contain H₂S and zones where the presence of H₂S is unknown.

We use the information to determine the conditions of the site to avoid hazards inherent in drilling/well operations. Specifically, we use the information to evaluate and approve the adequacy of the equipment, materials, and/or procedures that the lessee or operator plans to use during drilling/well plan modifications and changes in major equipment. In addition, except for proprietary data, BSEE is required by the OCS Lands Act to make available to the public certain information that is submitted.

Also, this ICR includes a form, APM, BSEE-0124. In this ICR, we have included a certification

statement on the form to state that false submissions are subject to criminal penalties.

Also, we clarified a section of Form BSEE-0124. This posed a minor edit as follows:

Question #18 updated the regulatory citations.

Once this IC collection is approved, the revisions will be added to the form and the eWell screen shot(s); the revised PRA statement will be posted on the eWell website.

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The information on this form is used to evaluate and approve the adequacy of the equipment, materials, and/or procedures that the lessee or operator plans to use during drilling plan modifications, changes in major drilling equipment, and plugging back. In addition, except for proprietary data, BSEE is required by the OCS Lands Act to make available to the public certain information submitted on BSEE-0124.

Heading: - Information to identify the well name, lease operator, type of revision and timing of the proposed modifications.

Well at Total Depth/Surface: - Information utilized by BSEE to identify the unique location (area, block and lease of the proposed activity).

Proposed or Completed Work: - Information identifying the specific activity, revision or modification for which approval is requested. This includes specific identification of equipment, engineering, and pressure test data needed by BSEE to ascertain that operations will be conducted in a manner that ensures the safety of personnel and protection of the environment.

Question Information: - Responses to questions (a) through (h) serve to ascertain compliance with applicable BSEE regulations, requirements, and adherence to good operating practices, as follows:

- Question a – Serves to ensure the submittal of a contingency plan to mitigate the presence of a dangerous concentration of H₂S.
- Question b – Information is needed to monitor possible lease expiration in the event proposed operations/modifications are unsuccessful.
- Question c – Information is needed to ascertain that adjacent wells and/or equipment are shut-in while moving heavy rig equipment on/off location in the interest of personnel safety and protection of the environment.
- Question d – Information is needed to ensure that down-hole commingling of hydrocarbon production from separate sand formations has been reviewed and determined to meet conservation requirements for oil/gas reserves.
- Question e – Information is needed to ensure that wells completed for hydrocarbon production within 500 feet of a block (lease) line have been reviewed to mitigate inequitable drainage of reserves from adjacent leases.

- Question f – Information is needed to ensure that the casing will be cut and removed to a depth 15 feet below the seafloor (mud line) to preclude possible damage to trawl/fishing nets.

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.

The BSEE estimates that we currently collect 95 percent of all information electronically that pertain to 30 CFR Part 250, APMs and all supporting documentation submitted.

The Gulf of Mexico region has implemented an internet based system, eWell, that provides respondents with the ability to permit and report well operations electronically using a secure web application. For those respondents with computerized well files, information can be taken directly from that file and imported into the eWell system; respondents generate and submit almost 100 percent of the information via this venue.

In the Pacific and Alaska Regions, respondents generate 100 percent of all the information on paper. These regions, as of now, do not have the ability for eWell. We are working diligently to implement eWell in these regions. At this time, we are still in the testing phase.

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 a specific drilling/well operation and does not duplicate any other available information; similar information is not readily available or discernible from other sources. The Departments of the Interior and other government agencies have Memoranda of Understanding which 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 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 have less than 500 employees and are considered small businesses as defined by the Small Business Administration. Because of the factors involved in various types of modifications to drilling/well operations for oil and gas and sulphur, the hour burden on any small entity subject to these regulations 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 BSEE did not collect the information, we could not 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 the specific drilling activity and initiated by respondents' activity.

In regards to the APM, if this information were not available, BSEE could not: (1) ensure that modifications to well/drilling operations are planned to minimize the risks to personnel and the environment; (2) require changes to drilling procedures or equipment to determine that levels of safety and environmental protection are maintained. Nor could we review information concerning requests for approval or subsequent reporting of well-completion, well-workover, and well-abandonment operations to determine that procedures and equipment are appropriate for the anticipated conditions.

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

Respondents are required to retain some well completion/well workover records until the well is permanently plugged or abandoned or the records are forwarded with a lease assignment. This could be longer than 3 years; however, it is critical that the records be available that relate to any alteration of the completion configuration or that affect activities on a hydrocarbon-bearing zone.

(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;

(f) requiring the use of statistical data classification that has been reviewed and approved by OMB;

(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

(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 provided a 60-day notice in the Federal Register on December 3, 2013 (78 FR 72693). In addition, 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 from Petrobas (industry). The first concern was about how BSEE included a certification statement on the form (BSEE-0124) that false submissions are subject to criminal penalties. The response to the commenters' input is as follows: The certification statement we added to the form is a standard statement on many Government forms. The statement is intended to remind submitters of the penalties for false statements. Anyone who submits a false statement to the Government may be subject to civil and criminal penalties even if the statement does not appear on a form. Inclusion of the statement serves to ensure submitters are aware of applicable law. Another concern was the addition of Question # 8b on the form. Well Status. Due to the comment, it came to light that industry does not have to insert that information on the form - once the form starts to be filled out, the well status information is populated automatically; therefore, we removed Question # 8b. The last concern pertains to the estimated reporting and recordkeeping non-hour cost burden. The commenter believes that the \$361,625 cost is for additional time and effort to file the form with the suggested changes. That is not the case. The BSEE is required to charge fees for services that provide special benefits or privileges to an identifiable non-Federal recipient above and beyond those which accrue to the public at large. The BSEE regulations specify APMs are subject to a \$125 cost recovery fee (30 CFR 250.125).

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

Apache Corporation, Ms. Cheryl Powell, Regulatory Supervisor,
(713) 296-6811, 2000 Post Oak Blvd., Suite #100, Houston, TX 77056

EPL Oil & Gas, Inc., Ms. Sheri Merrell, Regulatory Compliance Manager
(504) 799-4863, 201 Saint Charles Avenue, Suite 3400, New Orleans, LA 70123

Energy Resource Technology GOM, Inc., Ms. Patty Brewer, Regulatory Compliance,
(713) 328-3016, 500 Dallas Street, Suite 2000, Houston, TX 77002

Plains Exploration and Production Company, Gary Hertfelder, EH&S Manager,
(805) 937-6377, 201 S. Broadway, Orcutt, CA 93455-4606

All the different reporting and recordkeeping requirements that are listed in the 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 to our request 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 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.

The BSEE will protect proprietary information according to the Freedom of Information Act (5 U.S.C. 552) and DOI’s 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 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 burden.

Potential respondents include Federal OCS oil, gas, and sulphur 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 and reviewing the collection of information and are based on informal discussions with the listed respondents in Section A.8. Responses are mandatory and are generally submitted on occasion and vary by section. We estimate the total annual reporting and recordkeeping burden is 9,770 hours. Refer to the following table for a breakdown of the burdens.

| Citation 30 CFR 250 APM’s | Reporting or Recordkeeping Requirement | Hour Burden | Average No. of Annual Responses | Annual Burden Hours (Rounded) |
|---------------------------------|---|-----------------------|---------------------------------------|--|
| | | Non-Hour Cost Burdens | | |
| Subparts D, | Submit APM plans (BSEE-0124). (This burden represents | 1 | 2,893 | 2,893 |

| Citation 30 CFR 250 APM's | Reporting or Recordkeeping Requirement | Hour Burden | Average No. of Annual Responses | Annual Burden Hours (Rounded) |
|--|--|---|--|--|
| | | Non-Hour Cost Burdens | | |
| E, F, H, P, Q | only the filling out of the form, the requirements are listed separately below). | | applications | |
| | | 2,893 applications x \$125 application fee = \$361,625 | | |
| Subparts D, E, F, H, P, Q | Submit Revised APM plans (BSEE-0124). (This burden represents only the filling out of the form, the requirements are listed separately below) [no fee charged]. | 1 | 1,551 applications | 1,551 |
| | | Subtotal | 4,444 responses | 4,444 hour burdens |
| | | | \$361,625 non-hour cost burdens | |
| Subpart A | | | | |
| 125 | Submit evidence of your fee for services receipt. | Exempt under 5 CFR 1320.3(h)(1). | | 0 |
| 197 | Written confidentiality agreement. | Exempt under 5 CFR 1320.5(d)(2). | | 0 |
| Subpart D | | | | |
| 423(c)(3); 449(j); 449(k); 460(a); 465 | There are some regulatory requirements that give respondents the option of submitting information with either their APD or APM; industry advised us that when it comes to this particular subpart, they submit a Revised APD. There are no APM submittals under this subpart. | Burden covered under 30 CFR 250, Subpart D - 1014-0018. | | 0 |
| Subpart E | | | | |
| 513(a) | Obtain written approval for well-completion operations. Submit the following information, which includes but not limited to: request approval for the completion or if the completion objective or plans have changed; description of the well-completion procedures; statement of the expected surface pressure, and type and weight of completion fluids; schematic drawing; a partial electric log; H2S presence or if unknown. | 1 | 181 submittals | 181 |
| 514(d) | Obtain approval to displace kill weight fluid with detailed step-by-step written procedures that include, but are not limited to: number of barriers, tests, BOP procedures, fluid volumes entering and leaving wellbore procedures. | 40 mins. | 175 submittals | 117 |
| 515 | (a thru c) For completion operations, include the following BOP descriptions: components, pressure ratings and test pressures; schematic; independent third-party verification and supporting documentation about blind-shear rams. | 30 mins. | 181 submittals | 91 |
| | (d) When you use a subsea BOP stack, submit independent third-party verification about BOP stack requirements. | 15 mins. | 17 submittals | 4 |
| | (e)(1), (2) Independent third-party qualifications and evidence/ supporting documentation demonstrating their abilities. | 20 mins. | 192 submittals | 64 |
| 516(a) | Submit a well-control procedure that indicates how the annular preventer will be utilized, and the pressure limitations that will be applied during each mode of pressure control. | 15 mins. | 181 submittals | 45 |
| 517(d) | (8) Submit for approval test procedures, including how you will test each ROV function. | 20 mins. | 17 submittals | 6 |
| | (9)(i) Submit for approval test [autoshear and deadman] procedures. Include all required documentation. | 15 mins. | 17 submittals | 4 |
| 526(a); 527 | Submit a notification of corrective action of the diagnostic test. | 15 mins. | 68 notifications | 17 |

| Citation 30 CFR 250 APM's | Reporting or Recordkeeping Requirement | Hour Burden | Average No. of Annual Responses | Annual Burden Hours (Rounded) |
|---|---|----------------|---------------------------------------|--|
| | | | | |
| Subtotal of Subpart E | | | 1,029 responses | 529 hour burdens |
| Subpart F | | | | |
| 613 | (a), (b) Request approval to begin other than normal workover, which includes description of procedures, changes in equipment, schematic, info about H2S, etc.. | 30 mins. | 802 requests | 401 |
| | (c) If completing to a new zone, submit reason for abandonment and statement of anticipated pressure data for new zone. | 10 mins. | 205 submittal | 34 |
| | (d) Within 30 days after completing the well-workover operation, except routine operations, submit showing the work as performed. | 15 mins. | 762 submittals | 191 |
| 614(d) | Obtain approval to displace kill weight fluid with detailed step-by-step written procedures that include, but are not limited to: number of barriers, tests, BOP procedures, fluid volumes entering and leaving wellbore procedures. | 40 mins. | 51 requests | 34 |
| 615 | (a thru c) For workover operations, include the following BOP descriptions with your submittal: components, pressure ratings and test pressures; schematic; independent third-party verification and supporting documentation about blind-shear rams. | 30 mins. | 629 submittals | 315 |
| | (d) When you use a subsea BOP stack, independent third-party verification about BOP stack requirements. | 15 mins. | 51 verifications | 13 |
| | (e)(1), (2) Independent third-party qualifications and evidence/ supporting documentation demonstrating their abilities. | 20 mins. | 576 submittals | 192 |
| 616(a) | Submit well-workover procedures how the annular preventer will be utilized and the pressure limitations that will be applied during each mode of pressure control. | 20 mins. | 629 procedures | 210 |
| 616(f)(4) | Obtain approval to conduct operations without downhole check valves, describe alternate procedures and equipment to conduct operations without downhole check valves. | 15 mins. | 273 approvals | 68 |
| 617(d), (h) (1+2) | Obtain approval: stump test and include procedures; test procedures, including how you will test each ROV function and autoshear deadman; include required documentation; and utilization description. | 40 mins. | 51 approvals | 34 |
| Subtotal of Subpart F | | | 4,029 responses | 1,492 hour burdens |
| Subpart H | | | | |
| 801(h) | Request approval to temporarily remove safety device for non-routine operations. | 10 mins. | 55 approvals | 9 |
| 807(a) | Submit detailed information that demonstrates the SSSVs and related equipment capabilities re HPHT; include discussions of design verification analysis and validation, functional listing process, and procedures used; explain fit-for-service. | 40 mins. | 15 submittals | 10 |
| Subtotal of Subpart H | | | 70 responses | 19 hour burdens |
| Subpart P | | | | |
| It needs to be noted that for Sulphur Operations, while there may be burden hours listed that are associated with some form of an APM submittal, we have not had any sulphur leases for numerous years, therefore, we are submitting minimal burden. | | | | |

| Citation 30 CFR 250 APM's | Reporting or Recordkeeping Requirement | Hour Burden | Average No. of Annual Responses | Annual Burden Hours (Rounded) |
|---------------------------------|--|-----------------------|---------------------------------------|--|
| | | Non-Hour Cost Burdens | | |
| 1618(a), (b) | Request approval / submit requests for changes in plans, changes in major drilling equipment, proposals to deepen, sidetrack, complete, workover, or plug back a well, or engage in similar activities; include but not limited to, detailed statement of proposed work changed; present state of well; after completion, a detailed report of all the work done and results. | 30 mins. | 1 plan | 1 |
| 1619(b) | Submit duplicate copies of the records of all activities related to and conducted during the suspension or temporary prohibition. | 10 mins. | 1 submittal | 1 |
| 1622(a), (b) | Obtain written approval to begin operations; include description of procedures followed; changes to existing equipment, schematic drawing; zones info re H2S, etc. | 20 mins. | 1 approval | 1 |
| 1622(c) | (2) Submit results of any well tests and a new schematic of the well if any subsurface equipment has been changed. | 10 mins. | 1 submittal | 1 |
| Subtotal of Subpart P | | | 4 responses | 4 hour burdens |
| Subpart Q | | | | |
| 1706(a) | Request approval of well abandonment operations. | 20 mins. | 710 requests | 237 |
| 1706(f) | (4) Request approval to conduct operations without downhole check valves, describe alternate procedures and equipment. | 15 mins. | 500 requests | 125 |
| 1707(d) | Submit and obtain approval of plan describing the stump test procedures. | 10 mins. | 50 submittals | 8 |
| 1707(h) | (1) Submit test procedures, including how you will test each ROV function for approval; include documentation and utilization description. | 30 mins. | 50 submittals | 25 |
| 1709 | Obtain approval to displace kill weight fluid with detailed step-by-step written procedures that include, but are not limited to: number of barriers, tests, BOP procedures, fluid volumes entering and leaving wellbore procedures. | 30 mins. | 50 submittals | 25 |
| 1712; 1704(g) | (a), (b), (d), (f)(9 + 11), (g) Obtain and receive approval before permanently plugging a well or zone. Include in request, but not limited to, reason plugging well, with relevant information; well test and pressure data; type and weight of well control fluid; a schematic listing mud and cement properties; plus testing plans. Submit Certification by a Registered Professional Engineer of the well abandonment design and procedures; certify the design | 40 mins. | 244 certifications | 163 |
| | (c), (e), (f) Obtain and receive approval before permanently plugging a well or zone. Include in request, but not limited to max surface pressure and determination; description of work; well depth, perforated intervals; casing and tubing depths/details, plus locations, types, lengths, etc. | 1.5 | 444 submittals | 666 |
| 1717; 1704(g) | Submit with a final well schematic, description, nature and quantities of material used; relating to casing string - description of methods used, size and amount of casing and depth. | 1 | 434 submittals | 434 |
| 1721(a), (g), (h); 1704(g) | Submit the applicable information required to temporarily abandon a well for approval; after temporarily plugging a well, submit well schematic, description of remaining subsea wellheads, casing stubs, mudline suspension equipment and | 70 mins. | 1,296 submittals | 1,512 |

| Citation 30 CFR 250 APM's | Reporting or Recordkeeping Requirement | Hour Burden | Average No. of Annual Responses | Annual Burden Hours (Rounded) |
|---------------------------------|--|----------------|--|--|
| | | | | Non-Hour Cost Burdens |
| | required information of this section; submit certification by a Registered Professional Engineer of the well abandonment design and procedures; certify design. | | | |
| 1722(a), (d); 1704(g) | Request approval to install a subsea protective device. | 30 mins. | 15 requests / submittals | 8 |
| | Submit a report including dates of trawling test and vessel used; plat showing trawl lines; description of operation and nets used; seafloor penetration depth; summary of results listed in this section; letter signed by witness of test. | 1.5 | | 23 |
| 1723(b); 1704(g) | Submit a request to perform work to remove casing stub, mudline equipment, and/or subsea protective covering. | 20 mins. | 150 requests | 50 |
| 1743(a); 1704(g) | Submit signed certification; date of verification work and vessel; area surveyed; method used; results of survey including debris or statement that no objects were recover; a post-trawling plot or map showing area. | 1.25 | 5 certifications | 6 |
| Subtotal of Subpart Q | | | 3,948 responses | 3,282 hour burdens |
| Total Burden | | | 13,524 annual responses | 9,770 annual burden hours |
| | | | \$361,625 non-hour cost burdens | |

(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 \$129/hour (rounded). This cost is broken out in the below table using the Society of Petroleum Engineers Salary Survey. See SPE.org website:

<http://www.spe.org/career/docs/13SalarySurveyHighlights.pdf>.

| Position | Base Pay Hourly Rate (\$/hr) | Hourly Rate including Benefits (1.4* x \$/hr) | Percent of time spent on collection | Weighted Average (\$/hour/ rounded) |
|-----------------------------------|------------------------------------|---|--|--|
| Technical | \$72 | \$101 | 12% | \$12 |
| Engineers - Drilling | \$95 | \$133 | 63% | \$84 |
| Geologist | \$95 | \$133 | 25% | \$33 |
| Weighted Average (\$/hour) | | | | \$129 |

*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.

Based on a cost factor of \$129 per hour, we estimate the hour burden as a dollar equivalent to industry is \$1,260,330 (\$129 x 9,770 hours = \$1,260,330).

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 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 one non-hour cost burden. The 30 CFR 250.125 regulations require a cost recovery fee of \$125 for each APM submittal for an annual total of \$361,625 non-hour cost burdens. The application fee is required to recover the Federal Government’s processing costs. We have not identified any other non-hour cost burdens associated with 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.

The average government cost is \$75/hour (rounded). This cost is broken out in the below table using the Office of Personnel Management salary data for the REST OF THE UNITED STATES (<http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/#url=2014>).

| 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-7/5 | \$21 | \$32 | 5% | \$2 |
| Petroleum Engineer | GS-13/5 | \$44 | \$66 | 60% | \$40 |
| Supv. Petroleum Engineer | GS-15/5 | \$62 | \$93 | 35% | \$33 |
| Weighted Average (\$/hour) | | | | | \$75 |

*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.

To analyze and review the information respondents submit for this collection, we estimate the Government will spend an average of approximately 0.5 hour for each hour spent by lessees. Based on a cost factor of \$75 per hour, the annual burden on the Government for the regulatory requirements in this collection is \$366,375 (9,770 burden hours x 0.5 hour = 4,885 hours x \$75 = \$366,375).

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

The adjustments are as follows:

(a) The current OMB burden hour for the APM requirement, which is currently covered under IC 1014-0018 is 70,397 burden hours. In this submission, we are requesting a total of 9,770 burden hours. This represents an adjustment decrease of 60,627 hours. The decrease is twofold: (a) we received less applications, and (b) due to re-estimating the amount of time required to respond based on consultations with industry representatives listed in Section A.8. In the past, we had APMs listed as one line item in our burden table; therefore, we multiplied the total number of submittals times the hour burden. With this breakout of requirements based on each subpart, it came to light that not all the information was submitted each and every time, but in bits and pieces based on the occasion of the requirement; hence a much lower burden due to the number of responses being different for each submittal/requirement of the APM.

(b) The current OMB non-hour cost burden for the APM requirement, which is covered currently under 1014-0018 is \$480,356. In this submission, we are requesting a total of \$361,625. This represents an adjustment decrease of \$118,731. The decrease is due to receiving less APM applications this past cycle.

Once OMB approves this new collection, the hour and non-hour cost burdens associated with APMs will be removed from the IC 1014-0018.

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."