

Supporting Statement A for Paperwork Reduction Act Submissions
30 CFR 550, Subpart B – Plans and Information
BOEM Forms 0137, 0138, 0139, 0141, 0142, and NTLs
OMB Control Number 1010-0151
Current Expiration Date: December, 31 2014

Terms of Clearance: None.

General Instructions

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

Specific Instructions

A. Justification

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

The Outer Continental Shelf (OCS) Lands Act, as amended (43 U.S.C. 1331 *et seq.* and 43 U.S.C. 1801 *et seq.*), authorizes the Secretary of the Interior to prescribe rules and regulations to administer leasing of mineral resources on the OCS. Such rules and regulations apply to all operations conducted under a lease, right-of-use and easement, or unit. Sections 11 and 25 of the amended OCS Lands Act require the holders of OCS oil and gas or sulphur leases to submit exploration plans (EPs) and development and production plans (DPPs) to the Secretary for approval prior to commencing these activities. As a Federal agency, we also have a continuing affirmative duty to comply with the National Environmental Policy Act (NEPA), Endangered Species Act (ESA), and the Marine Mammal Protection Act (MMPA). This includes a substantive duty to carry out any agency action in a manner that is not likely to jeopardize protected species as well as a procedural duty to consult with the Fish and Wildlife Service (FWS) and National Oceanic and Atmospheric Administration Fisheries (NOAA Fisheries) before engaging in a discretionary action that may affect a protected species.

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. Several requests for approval required in Subpart B are subject to cost recovery, and BOEM regulations specify service fees for these requests.

These authorities and responsibilities are among those delegated to BOEM. The regulations at 30 CFR 550, Subpart B, concern plans and information that must be submitted to conduct activities on a lease, right-of-use and easement, or unit and are the subject of this collection. The collection also covers the

related Notices to Lessees and Operators (NTLs) that BOEM issues to clarify, supplement, or provide additional guidance on some aspects of our regulations.

In this submission, BOEM is deleting the requirements, and their corresponding burdens, from Subpart B that were transferred to the Bureau of Safety and Environmental Enforcement (BSEE) per Secretarial Order No. 3299, May 19, 2010.

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 engineers, geologists, geophysicists, and environmental scientists and other Federal agencies (e.g., FWS, NOAA Fisheries) analyze and evaluate the information and data collected under Subpart B to ensure that planned operations are safe; will not adversely affect the marine, coastal, or human environment; and will conserve the resources of the OCS. We use the information to: (a) make an informed decision on whether to approve the proposed exploration or development and production plans as submitted, or whether modifications are necessary without the analysis and evaluation of the required information. The affected States also review the information collected to determine consistency with approved Coastal Zone Management (CZM) plans and (b) report annually to NOAA Fisheries the effectiveness of mitigation, any adverse effects of the proposed action, and any incidental take, in accordance with 50 CFR 402.14(i)(3).

The following forms submitted to BOEM under Subpart B and their purposes are as follows:

BOEM-0137—Plan Information Form is submitted to summarize plan information. BOEM uses the information to assist in data entry and review of submitted OCS plans. In this renewal, BOEM is modifying the form to clarify wording of some fields, remove redundant fields, and make some minor formatting adjustments to improve printing performance. We do not expect any change to the burden as a result.

The form asks for, in either fill in the blanks or check marks:

- general information relating to the company;
- description of proposed activities;
- tentative schedule of proposed activities;
- description(s) of drilling rig, production platform, lease term pipelines;
- proposed well structure location; and
- anchor locations for drilling rig or construction barge.

BOEM-0138—GOM Air Emission Calculations for Exploration Plans

BOEM-0139—GOM Air Emission Calculations for Development & Production Plans (DPPs) and Development & Operations Coordination Documents (DOCDs) are submitted to standardize the way potential air emissions are estimated and approved as part of the OCS plan. These forms are intended to be thorough but flexible to meet the needs of different lessees and operators. BOEM uses the data from these forms to determine the effect of air emissions on the environment. These forms consist of:

- title, factors, emissions page; and a
- summary page that describes and calculates the estimated emissions from an activity.

Respondents are asked to categorize emissions into 9 factors:

- natural gas prime movers, diesel-fired prime movers, heaters/boilers/firetubes/natural gas-fired,
- gas flares, liquid flares, tanks, fugitives, glycol dehydrator vent, and gas venting.

BOEM-0141—ROV Survey Report is submitted to report the observations and information recorded from two sets of remotely operated vehicle (ROV) monitoring surveys to identify high-density benthic communities that may occur on the seafloor in deep water. The form asks respondents for general operator/facility information and a transect drawing of the survey pattern made by the ROV; a video tape (VHS) and transcript of what was visualized at the bottom throughout deployment (the form includes a guide to animal groups and a guide to physical features), and any additional imagery that helps depict bottom conditions. We use the information when such areas are found to help design mitigation measures to avoid these areas and to help assess the effectiveness of avoidance criteria.

BOEM-0142—Environmental Impact Analysis Worksheet is a fill-in-the-blank form that is submitted to identify the environmental impact-producing factors (IPFs) for the listed environmental resources. We use the information to help assess impacts and determine compliance with the National Environmental Policy Act. Respondents are asked to fill in the blank by placing an “x” in the space under each IPF category associated with the proposed activity that may impact a particular environmental resource.

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, 60-70 percent of all information is submitted electronically. However, because of the various types of information submitted with the plans (maps, surveys, spreadsheets, etc.), some of the submission may not readily lend itself to electronic commerce. In some instances, paper copies of the non-proprietary information submitted in the plans and accompanying information may continue to be necessary for review by States, local governments, and the public. In addition, BOEM is working on an electronic submission system for plans and associated documentation that will mostly likely reduce the burden for plans. This system will eventually be integrated with a companion system that BSEE is developing for permits. The integrated system will enable both Bureaus to access all plan data to ensure compliance before granting permits (e.g., permits to drill) and result in faster plan approval time. BOEM is currently working with a contractor to capture the current work flow and document methods to streamline. After all the design components are identified, BOEM will contract out the building and testing of the system before implementation.

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 the proposed operations. If information has already been submitted and is readily available to BOEM, respondents may reference the earlier submission. If changes to plans are necessary or required, only information related to the required changes must be resubmitted.

With respect to air emissions information, the Environmental Protection Agency (EPA) has the primary responsibility for air quality in the United States—onshore and offshore—except for the offshore area

known as the western Gulf of Mexico (GOM) (west of the State boundary line of Alabama and Florida). As stated in the Clean Air Act, 1990, BOEM has air quality jurisdiction for this area. Therefore, in the western GOM, BOEM requires an air emission summary to be submitted with the plans (before the activity begins) in order to prepare the appropriate NEPA documents (Environmental Assessments, Environmental Impact Statements, etc.) and to assure that the proposed activity will not violate the Clean Air Act. The EPA has air quality jurisdiction for the eastern Gulf of Mexico. (BOEM was recently relegated air quality responsibilities regarding the OCS off the North Slope Borough of the State of Alaska; however, such requirements and their associated burdens will be addressed separately through a BOEM rulemaking.)

Also, as it relates to ESA, no other Federal agency has the responsibility for collecting information relative to the impacts of OCS oil and gas exploration, development, and production activities. Similar information does not exist and has not been collected. Respondents will report to BOEM, and, in turn, BOEM will provide the required information to NOAA Fisheries and FWS, as appropriate. Therefore, there is no duplicate burden to the public.

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. Many of the OCS lessees and operators have less than 500 employees and are considered small businesses as defined by the Small Business Administration. BOEM is required to comply with the OCS Lands Act, ESA and the NOAA Fisheries' Biological Opinions; therefore, we cannot reduce the burden 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 BOEM did not collect the information, we could not carry out the mandate of the OCS Lands Act, as amended, which specifies that exploration or development and production activities on the OCS may not be conducted until comprehensive plans are submitted and approved. Extensive data and information are necessary to make informed decisions on whether to approve these plans or require appropriate changes.

To be exempt from the prohibitions of Section 9 of the ESA (which prohibits taking of listed species), BOEM must comply with the nondiscretionary terms and conditions that outline required reporting and monitoring requirements. To monitor the impact of incidental takes resulting from exploration, development, and production activities associated with lease sales, BOEM must report the progress of the action and its impact on the species to NOAA. The lease sales provide hydrocarbon resources to meet the Nation's energy needs and are the second highest revenue generation mechanism for the U.S. Treasury.

The information is collected only once for each particular plan and/or is dependent only upon the activities of the respondents; therefore, the frequency of collection is not applicable nor an issue.

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;

Vessel crews must report sightings of any injured or dead protected species (marine mammals and sea turtles) immediately to the NOAA Fisheries Stranding Hotline at (877) 433-8299. In addition, if the injury or death was caused by an OCS-related activity, operators must provide notification within 24 hours of the strike by email to protectedspecies@bsee.gov. This immediate response is necessary to comply with the NOAA Fisheries' mandate to report "takes" promptly.

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

BOEM requires that any marine mammal observation and monitoring reports be submitted on the 1st and 15th of each month via email. This schedule is beneficial for two reasons: (1) data and sightings gathered over a 2-week period should be a manageable quantity that can be recorded and sent quickly and easily, by mail or electronically and (2) the rotation of a crew on typical seismic operations could make less frequent reporting problematic. A bimonthly reporting schedule will normally involve only one crew. However, there is a requirement to report within 24 hours the sighting of a sperm whale in the exclusion zone (that results in a shut down of air guns). This immediate response is necessary for BOEM to comply with the NOAA Fisheries' mandate to report "takes" promptly.

(c) requiring respondents to submit more than an original and two copies of any document;

The number of copies of plans and accompanying information respondents are required to submit varies depending on the location of the proposed activities. BOEM is under a mandated timeframe to review and make decisions on these plans, which can be quite complex, voluminous, and detailed. Several program areas within BOEM must review the information simultaneously to meet the mandated timeframe. If BOEM had to reproduce the necessary copies for its internal reviews, it would be extremely difficult, if not impossible, to meet the deadlines imposed by OCS Lands Act, as amended. Therefore, respondents submitting paper copies are required to submit four "proprietary" copies of their plans. In addition, the OCS Lands Act also requires that we make non-proprietary (public information) copies available for simultaneous review by State and local government entities. Depending on the State(s) involved, BOEM needs from 3 to 17 public information copies to distribute to the States and local governments having an interest in the project, as well as a copy to make available for the general public to review. Companies have indicated on occasion that they have no objection to providing the extra copies to expedite the review processes.

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

It is also necessary that respondents retain data and information longer than 3 years. Much of the supporting information is to be retained for the duration of the project. However, this type of information is such that respondents would be very unlikely to dispose of it sooner. It contains valuable background data and analyses that they would not want to duplicate should it be needed during the life of the exploration or development and production project. We consider the burden only to make the information available to BOEM if necessary.

(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 provided a 60-day notice in the *Federal Register* on June 9, 2014 (79 FR 32989). We received one comment, but it did not apply to the collection. Also, 30 CFR 550.199 and the Paperwork Reduction Act statement on the associated forms explain that BOEM will accept comments at any time on the information collected and the burden. In addition, we display on the NTLs the OMB control number and provide the address for sending comments to BOEM.

During the comment period, BOEM requested input from several respondents on the availability of data, frequency of collection, clarity of instructions, and elements being collected. No response was received so BOEM contacted each again. On the second request, respondents indicated that our burden hour estimates were accurate in their experience. As a result, there were no changes in the burden hour estimates in No. 12, although the number of submissions did increase during this renewal cycle.

Regulatory Coordinator, (713) 659-1222, Walter Oil and Gas Corporation, 1100 Louisiana Street, Suite 200, Houston, TX 77002-5299	Regulatory Compliance Area Manager, (713) 808-2881, Petrobras America Inc., 10350 Richmond Ave., Suite 1400, Houston, TX 77042
Regulatory Supervisor, (713) 296-6811, Apache Corporation, 2000 Post Oak Blvd., Suite 100, Houston, TX 77056	Senior EH&S Advisor, (805) 934-8219, Freeport-McMoran Oil and Gas, 201 S. Broadway, Orcutt, CA 93455

Regulatory Coordinator, (713) 599-6349, BHP Billiton Petroleum (GOM) Inc., 1360 Post Oak Blvd., Suite 150, Houston, TX 77056-3020	Land Use Permitting and Compliance Advisor, (907) 564-5328, BP Exploration (Alaska) Inc., 900 E. Benson Blvd, Anchorage, AK 99508
Senior Regulatory Specialist, (281) 654-1941, ExxonMobil Corporation, PO Box 4778, Houston, TX 77210	Project Manager, (907) 646-7131, Shell Regulatory Affairs/Alaska Venture, 3601 C Street, Suite 1314, Anchorage, AK 99503

In response to the 30-day notice for the renewal of this collection, the Center for Regulatory Excellence (CRE) submitted comments.

CRE supports the renewal of OMB Control No.1010-0151, stating that the collection only covers and authorizes current, time-tested monitoring and reporting requirements.

CRE stated that it was making these comments to inform OMB/OIRA that BOEM is planning an information collection that would significantly increase the burden of BOEM's monitoring requirements for G&G activities, including seismic, in the Gulf of Mexico. CRE opposed the long-term management plan (LTMP), stated that BOEM would need OMB approval for LTMP, and stated that the public would need an opportunity to comment. CRE made the following recommendations:

- BOEM and NMFS should not proceed with the LTMP. Current monitoring requirements are less burdensome and all that's necessary to protect marine mammals.
- If BOEM and NMFS do proceed with the LTMP, then they should request new ICRs that cover the LTMP. Those new ICRs should be subject to public comment. BOEM and NMFS should not try to implement the LTMP until and unless the new ICRs have been reviewed and approved by OMB/OIRA.
- If BOEM and NMFS do proceed with the LTMP, then they should perform predissemination review of compliance with the IQA Guidelines and the PRA's practical utility requirements. The public should be allowed to comment on this pre-dissemination review before it is final.
- If BOEM and NMFS do proceed with the LTMP, then they should perform a cost benefit analysis, as required by Executive Order 13563, to determine whether the benefits of the LTMP, if any, justify its costs.

BOEM is in the early planning stages for LTMP and no decisions have been made. We issued a Federal Register notice on November 7, 2014 (79 FR 66402) requesting information to aid in the development of LTMP for the Gulf of Mexico. Comments were due on December 8. BOEM will seek OMB approval for all information collected by either revising a currently approved collection or requesting approval for a new collection. At a minimum, the public will have opportunities to comment through the Paperwork Reduction Act process.

In addition, BOEM will arrange a meeting with CRE and appropriate BOEM offices to discuss the upcoming monitoring requirements for G&G activities in the Gulf.

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

BOEM 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.

BOEM will protect information considered proprietary under the Freedom of Information Act (5 U.S.C. 552), under regulations at 30 CFR 550.197, “Data and information to be made available to the public or for limited inspection,” and 30 CFR Part 552, “Outer Continental Shelf (OCS) Oil and Gas Information Program.”

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

The collection does not include sensitive or private questions.

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

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

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

Potential respondents include Federal OCS oil, gas, and sulphur lessees and operators. It should be noted that not all of the potential respondents will submit information in any given year and some may submit multiple times. The burden estimates include the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Submissions are generally on occasion, semi-monthly, and vary by section. We estimate the total annual burden is 432,512 hours.

BURDEN BREAKDOWN

Citation 30 CFR 550 Subpart B and NTLs	Reporting & Recordkeeping Requirement¹	Hour Burden	Average No. of Annual Responses	Burden Hours
		Non-Hour Costs²		
200 thru 206	General requirements for plans and information; fees/refunds, etc.	Burden included with specific requirements below.		0
201 thru 206; 211 thru 228:	BOEM posts on FDMS, EPs/DPPs/DOCDs, and receives public comments in preparation of EAs.	Not considered IC as defined in 5 CFR 1320.3(h)		0

Citation 30 CFR 550 Subpart B	Reporting & Recordkeeping Requirement¹	Hour Burden	Average No. of Annual Responses	Burden Hours
		Non-Hour Costs²		
241 thru 262		(4).		
Ancillary Activities				
208; NTLs	Notify BOEM in writing and other users of the OCS before conducting ancillary activities.	11	61 notices	671
207; 210(a)	Submit report summarizing & analyzing data/information obtained or derived from ancillary activities.	2	61 reports	122
207; 210(b)	Retain ancillary activities data/information; upon request, submit to BOEM.	2	61 records	122
		2.5	1 submittal	3 (rounded)
		Subtotal		184 responses
				918 hours
Contents of Exploration Plans (EP)				
200-206; 209; 231(b); 232(d); 234; 235; 281; 283; 284; 285; NTLs	Submit amended, modified, revised, or supplemental EP, or resubmit disapproved EP, including required information; withdraw an EP.	150	345 changed plans ³	51,750
200-206; 209; 211 thru 228; NTLs	Submit EP and all required information (including, but not limited to, submissions required by BOEM Forms 0137, 0138, 0142; lease stipulations; withdrawals; air quality info.; reports, including shallow hazards surveys, H2S, G&G, archaeological surveys (550.194)), in specified formats. Provide notifications; retain data.	600	163 ³	97,800
		\$3,673 x 163 EP surface locations = \$598,699		
220	Alaska-specific requirements.	Burden included with EP requirements (30 CFR 550.211-228).		0
		Subtotal		508 responses
				149,550 hours
		\$598,699 Non-Hour Costs		
Review and Decision Process for the EP				
235(b); 272(b); 281(d)(3)(ii)	Appeal State's objection.	Burden exempt as defined in 5 CFR 1320.4(a)(2), (c).		0
Contents of Development and Production Plans (DPP) and Development Operations Coordination Documents (DOCD)				
200-206; 209; 266(b); 267(d); 272(a); 273; 281; 283; 284; 285; NTLs	Submit amended, modified, revised, or supplemental DPP or DOCD, including required information, or resubmit disapproved DPP or DOCD.	235	353 changed plans ³	82,955
200-206; 241 thru 262; 209; NTLs	Submit DPP/DOCD and required/supporting information (including, but not limited to, submissions required by BOEM Forms 0137, 0139, 0142; lease stipulations; withdrawals; air quality info.; reports, including shallow hazards surveys, archaeological surveys (550.194)), in specified formats. Provide notifications; retain data.	700	268 ³	187,600
		\$4,238 x 268 DPP/DOCD wells = \$1,135,784.		
		Subtotal		621 responses
				270,555 hours
		\$1,135,784 Non-hour costs		
Review and Decision Process for the DPP or DOCD				

Citation 30 CFR 550 Subpart B	Reporting & Recordkeeping Requirement¹	Hour Burden	Average No. of Annual Responses	Burden Hours
		Non-Hour Costs²		
267(a)	Once BOEM deemed DPP/DOCD submitted; Governor of each affected State, local government official; etc., submit comments/recommendations.	1	1 submittal	1
267(b)	General public comments/recommendations submitted to BOEM re: DPPs or DOCDs.		Not considered IC as defined in 5 CFR 1320.3(h)(4).	0
269(b)	Submit information on preliminary plans for leases or units in vicinity of proposed development and production activities.	3	1 response	3
		Subtotal	2 responses	4 hours
Post-Approval Requirements for the EP, DPP, and DOCD				
280	Request departure from your approved EP, DPP, or DOCD.		Burden included under 1010-0114.	0
281(a)	Submit various BSEE applications.		Burdens included under appropriate subpart or form (1014-0003; 1014-0011; 1014-0016; 1014-0018).	0
282	Retain monitoring data/information; upon request, make available to BOEM.	4	150 records	600
	Submit monitoring plan for approval	2	6 plans	12
282(b)	Submit monitoring reports and data (including BOEM Form 0141 used in GOMR).	3	12 reports	36
284	Submit updated info on activities conducted under approved EP/DPP/DOCD.	4	56 updates	224
		Subtotal	224 responses	872 hours
Submit CIDs				
296(a); 297	Submit CID and required/supporting information.	375	14 documents	5,250
			\$27,348 x 14 = \$382,872	
296(b); 297	Submit a revised CID for approval.	100	13 revisions	1,300
		Subtotal	27 responses	6,550 hours
			\$382,872 non-hour costs	
Seismic Survey Mitigation Measures and Protected Species Observer Program NTL				
NTL; 211 thru 228; 241 thru 262	Submit to BOEM observer training requirement materials and information.	1.5 hours	2 sets of material	3
	Training certification and recordkeeping.	1 hour	1 new trainee	1
	During seismic acquisition operations, submit daily observer reports semi-monthly.	1.5 hours	344 reports	516
	If used, submit to BOEM information on any passive acoustic monitoring system prior to placing it in service.	2 hour	6 submittals	12
	During seismic acquisition operations, submit to BOEM marine mammal observation report(s) semi-monthly or within 24 hours if air gun operations were shut down.	1.5 hours	1,976 reports	2,964
	During seismic acquisition operations, when air guns are being discharged, submit daily observer reports semi-monthly.	1.5 hours	344 reports	516
	Observation Duty (3 observers fulfilling an 8 hour shift ea for 365 calendar days x 4 vessels = 35,040 man-hours). This requirement is contracted out; hence the non-hour cost burden.		3 observers x 8 hrs x 365 days = 8,760 hours x 4 vessels observing = 35,040 man-hours x \$52/hr = \$1,822,080.	
		Subtotal	2,673 responses	4,012 hours

Citation 30 CFR 550 Subpart B	Reporting & Recordkeeping Requirement ¹	Hour Burden	Average No. of Annual Responses	Burden Hours		
		Non-Hour Costs ²				
		\$1,822,080 Non-Hour Costs				
Vessel Strike Avoidance and Injured/Protected Species Reporting NTL						
NTL; 211 thru 228; 241 thru 262	Notify BOEM within 24 hours of strike, when your vessel injures/kills a protected species (marine mammal/sea turtle)	1 hour	1 notice	1		
		Subtotal	1 response	1 hour		
General Departure						
200 thru 299	General departure and alternative compliance requests not specifically covered elsewhere in Subpart B regulations.	2	25 requests	50		
		Subtotal	25 responses	50 hours		
TOTAL BURDEN						
			4,265 Responses	432,512 Hours		
			\$3,939,435 Non-Hour Costs			

¹ In the future, BOEM may require electronic filing of some submissions.

² Fees are subject to modification per inflation annually.

³ Number of plans currently estimated for all OCS areas.

(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 be included under “annual Cost to the Federal Government.”

The average respondent cost is \$85*/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	All Workers	\$68	95	15%	\$14
Weighted Average (\$/hour)					\$85

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

** A multiplier of 1.4 (as implied by BLS news release USDL 14-1673, Sept. 10, 2014 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

Based on a cost factor of \$85 per hour, we estimate the total annual cost to industry as a dollar equivalent is \$36,763,520 (\$85 x 432,512 hours = \$36,763,520).

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 reflect in Item 12).

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

(b) If cost estimates are expected to vary widely, agencies should present ranges of cost burden and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

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

We have identified three non-hour costs associated with this information collection that are cost recovery fees. They consist of fees being submitted with EP's (\$3,673), DPP's or DOCD's (\$4,238), and CID's (\$27,348).

There is also one non-hour cost burden associated with the Protected Species Observer Program. The cost associated with this program is due to observation activities that are usually subcontracted to other service companies with expertise in these areas. Since all of the observation duty and reporting would be done while on the vessel and by contractors, these requirements were calculated as non-hour cost burdens. See the hours, fees, and costs in the burden table in A.12.

We estimate that the annual total non-hour cost burden is \$3,939,435.

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 Federal cost is \$56/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.

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
Regulatory	GS-11/5	\$31	\$47	40%	\$19
Engineers/Geologists	GS-13/5	\$45	\$68	25%	\$17
Biologist/Physical Scientist	GS-12/5	\$38	\$57	25%	\$14
Supv. Physical Scientist	GS-14	\$53	\$80	5%	\$4
Weighted Average (\$/hour)					\$56

* A multiplier of 1.5 (as implied by BLS news release USDL 14-1673, Sept. 10, 2014 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

To analyze and review the information required by Subpart B and related NTLs, we estimate the Government will spend an average of approximately 1/4 hour for each hour spent by respondents for a total of 108,128 hours (432,512 divided by 4 = 108,128). Based on a cost factor of \$56 per hour, the total gross annualized cost to the Government is \$6,055,168.

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

This collection has both program changes and adjustments. The currently approved annual hour burden is 190,480 hours. This submission requests 432,512 hours. The currently approved annual reporting and recordkeeping non-hour cost burden is \$3,713,665. This submission requests \$3,939,435.

Hours: We made a program decrease of 17,650 hours due to requirements/burdens being transferred to BSEE regulations and approved by OMB under 1014-0023 and 1014-0024. We also made an adjustment increase of 259,682 hours primarily due to an increase in the number of annual responses for plan submissions and their revisions (EP's §§ 550.211-228 and DPP's/DOCD's §§ 550.241-262). Since the last renewal, BOEM has greatly improved its techniques for querying the database and therefore reporting a greater number of plans/plan revisions. Also, the increase is due to some companies having submitted all new air quality plans based on operator audits. Ancillary activities (§§ 550.207-210) also increased because more companies are performing preliminary work (e.g., surveys and core sampling) to avoid well issues in the future.

Costs: We made a program decrease of \$40,032 for deleting requirements with cost recovery fees that were transferred to BSEE and approved by OMB under 1014-0024. There is also an adjustment increase of \$265,802 due to the increase in the number of annual responses for plan submissions and revisions, as noted above.

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.

BOEM 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.”

There are no exceptions to the certification statement.