

Supporting Statement A
30 CFR 250, Subpart D, Oil and Gas Drilling Operations
Forms BSEE-0125, -0133, -0133S, and -0144
OMB Control Number 1014-0018
Current Expiration Date: October 31, 2014

NOTE: Between the 60-day FR notice (79 FR 20897, April 14, 2014) associated with this collection and this submission, we removed the Application for Permit to Drill (APD - BSEE-0123, including a revised APD), Supplemental APD Information Sheet (BSEE-0123S), and the Application for Permit to Modify (APM - BSEE-0124, including a revised APM) forms and requirements that were previously associated with this collection. We separated out these requirements and burdens and put them into two separate information collections (ICs) so that both industry and BSEE will have a better understanding of the complexities associated with all the information that is submitted and will reflect more accurate burden estimates. The OMB approved the requests, and assigned the APD information collection with OMB Control Number 1014-0025 on April 29, 2014; and assigned the APM information collection with OMB Control Number 1014-0026 on May 7, 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

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 at 43 U.S.C. 1334 authorizes the Secretary of the Interior to prescribe rules and regulations necessary for the administration of the leasing provisions of the Act related to mineral resources on the OCS. Such rules and regulations will apply to all operations conducted under a lease, right-of-way, or a right-of-use and easement. Operations on the OCS must preserve, protect, and develop oil and natural gas resources in a manner that is consistent with the need to make such resources available to meet the Nation's energy needs as rapidly as possible; to balance orderly energy resource development with protection of human, marine, and coastal environments; to ensure the public a fair and equitable return on the resources of the OCS; and to preserve and maintain free enterprise competition.

In addition to the general rulemaking authority of the OCS Lands Act at 43 U.S.C. 1334, section 301(a) of the Federal Oil and Gas Royalty Management Act (FOGRMA), 30 U.S.C. 1751(a), grants authority to the Secretary to prescribe such rules and regulations as are reasonably necessary to carry out FOGRMA's provisions. While the majority of FOGRMA is directed to royalty collection and enforcement, some provisions apply to offshore operations. For example, section 108 of FOGRMA, 30 U.S.C. 1718, grants the Secretary broad authority to inspect lease sites for the purpose of determining whether there is compliance with the mineral leasing laws. Section 109(c)(2) and (d)(1), 30 U.S.C. 1719(c)(2) and (d)(1), impose substantial civil penalties for failure to permit lawful inspections and for knowing or willful preparation or submission of false, inaccurate, or misleading reports, records, or other information. Because the Secretary has delegated some of the authority under FOGRMA to the Bureau of Safety and Environmental Enforcement (BSEE), 30 U.S.C. 1751 is included as additional authority for these requirements.

These authorities and responsibilities are among those delegated to BSEE.

The regulations at 30 CFR 250, subpart D, concern oil and gas drilling operations and are the subject of this collection. 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 drilling operations and to protect the human, marine, and coastal environment. Among other things, BSEE specifically uses the information to ensure: the drilling unit is fit for the intended purpose; the lessee or operator will not encounter geologic conditions that present a hazard to operations; equipment is maintained in a state of readiness and meets safety standards; each drilling 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 drilling 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.

This ICR includes four forms. In this submission, we have included a certification statement on all the forms to state that false submissions are subject to criminal penalties.

A minor change to include Alaska and Pacific OCS Regional contact information was made on Form BSEE-0144.

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

The forms use and information consist of the following:

End of Operations Report, BSEE-0125

This information is used to ensure that industry has accurate and up-to-date data and information on wells and leasehold activities under their jurisdiction and to ensure compliance with approved plans and any conditions placed upon a suspension or temporary probation. It is also used to evaluate the remedial action in the event of well equipment failure or well control loss. The Form BSEE-0125 is updated and resubmitted in the event the well status changes. 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-0125.

Information on the form:

Heading - ascertain the well name, status of completion/abandonment, and operator name.

Well at Total Depth - ascertain the location and the latitude/longitude at total depth.

Well Status Information - ascertain well status data and measured/true vertical depth of the well.

Well at Producing Zone - ascertain the location and latitude/longitude of the producing zone.

Perforated Interval(s) This Completion - ascertain well measured/true vertical depth at the top and bottom of intervals perforated for production.

Hydrocarbon Bearing Intervals - identify the top and bottom of hydrocarbon bearing intervals penetrated by the well and the type hydrocarbon (oil/gas) present.

List of Significant Markers Penetrated - to make structural correlations, in conjunction with seismic data, with other wells drilled in the area. Anticipated marker areas not penetrated (i.e., not present) also provide valuable reservoir information.

Subsea Completion - Identify wells that are completed with the wellhead (tree) at the ocean floor (mud line). This data is needed to ascertain that the wellhead is protected from being damaged and that the location is marked with a buoy.

Abandonment History of Well - ensure that, upon permanent plugging, the casing is cut and removed to an elevation below the ocean floor (mud line) to eliminate any hazard to navigation (fishing, trawling) unless otherwise protected and/or the location marked with a buoy.

Well Activity Report, BSEE-0133 and -0133S

The BSEE uses this information to monitor the conditions of a well and status of drilling operations. We review the information to be aware of the well conditions and current drilling activity (i.e., well depth, drilling fluid weight, casing types and setting depths, completed well logs, and recent safety equipment tests and drills). The engineer uses this information to determine how accurately the lessee anticipated well conditions and if the lessee or operator is following the other approved forms that were submitted. With the information collected on BSEE-0133 available, the reviewers can analyze the

proposed revisions (e.g., revised grade of casing or deeper casing setting depth) and make a quick and informed decision on the request.

In addition, except for proprietary data, BSEE is required by the OCS Lands Act to make available to the public certain information submitted on Forms BSEE-0133 and -0133S.

BSEE-0133

General Information - Identifies the well name, lease operator, name of the contractor and rig or unit conducting drilling or remedial work, the water depth and the elevation.

Current Well Bore Information - This information is used to identify the well, surface location, and dates operations are initiated and concluded. Also identified is the bottom hole location, measured and true vertical depth of the well, drilling fluid (mud) weight, and blowout preventer test information needed to evaluate approval or modification applications to ensure safety and environmental protection.

Well Bore Historical Information - Identifies the dates drilling is initiated and completed or the well is abandoned and final measured and true vertical depths reached. This information is needed to evaluate modification applications to ensure safety and protection of the environment.

Casing/Liner/Tubing Record - Identifies casing/liner/tubing hole size, pipe size, weight, grade, test pressures, setting depths, and cement volumes. This information is used to evaluate modification applications and to ascertain that operations are conducted in a safe manner as approved.

Well Activity Summary - This narrative summary provides the details of daily operations needed to confirm that operations are being conducted consistent with approved plans.

Open Hole Log Date - Serves to identify whether or not open hole logs, formation samples and surveys have been conducted so as to trigger the submittal of Form BSEE-0133S.

Significant Well Events - Serves to identify significant events, hazards or problems encountered during well operations and to provide narrative information detailing those events which occurred. BSEE needs this information in the assessment and approval of other well operations in the area that may encounter the same or similar hazards, risks or problems. Provides narrative information concerning any significant events. Attachments may be required, if necessary.

BSEE-0133S

General Information - Identifies the well, rig, or remedial unit name and contractor, lease operator, water depth, and elevation.

Open Hole Tools, Mud Logs, and Directional Surveys - Identifies the dates and types of open hole operations, logs, tests, or surveys conducted; the service company(s) conducting the operations; and the top and bottom of those formations logged or surveyed. Serves as an inventory to ensure that BSEE receives the data from all open hole logs/tests/surveys conducted. Open hole data is utilized in the

determination of oil and gas recoverable reserves and production limits. As permitted by the regulations, the data is also made available to the public.

Identify Other Open Hole Data Collection - Identifies the conduct of other specific analyses, samples and surveys and requires the narrative description of any other surveys conducted.

Rig Movement Notification Report, Form BSEE-0144

As activity increased over the years in the Gulf of Mexico (GOM), the rig notification requirement became essential for inspection scheduling and has become a standard condition of approval for certain permits. We need the information on BSEE-0144 to schedule inspections and verify that the equipment being used complies with approved permits. In reporting rig movements, respondents have the option of submitting the form or using a web-based system for electronic data submissions, (see A.3). The information on this form is used by all 3 regions, but primarily in the GOM to ascertain the precise arrival and departure of all rigs in OCS waters in the GOM. The accurate location of these rigs is necessary to facilitate the scheduling of inspections by BSEE personnel.

It is noted that the U.S. Coast Guard (USCG) also requires notification of rig movement, and in certain instances, the Defense Mapping Agency, and that there is some duplication of information reported (see A.4). Therefore, there are some data elements in the form that are optional for BSEE reporting purposes, since we do not need this information. These optional data elements in the form satisfy any concerns in reporting rig movement information to to address the multi-agency reporting concern.

General Information - Identifies the date, lease operator, rig name/type/representative, and rig telephone number.

Rig Arrival Information - Identifies the rig arrival date; what type of work will be scheduled; relevant well information; duration of operations, and optional information

Rig Departure Information - Identifies the rig departure date, well status, relevant well information, being skidded, obstruction issues, and optional 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.

The BSEE encourages respondents to use the forms available on the website and submit them electronically as attachments to secure emails; or to use eWell--an internet based system that provides respondents with the ability to submit most forms electronically using a secure web application in lieu of submitting paper forms. At present, an estimated 95 percent of submittals pertaining to this collection are being submitted electronically.

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

The information collected is unique to 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.

With respect to rig movement notices (Form BSEE-0144), the USCG also collects similar information, but for a wider variety of vessels, as does, in certain instances, the Defense Mapping Agency. However, the final version of Form BSEE-0144 does include optional data elements requested by industry so they can submit the one form to all agencies to address the multi-agency reporting concern (see A.2).

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 an 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. Regulations require safe work practices and protection of the environmental resources; also because of the factors involved when drilling for oil or gas, 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 drilling activity and initiated by respondents' activity. During drilling operations, respondents must submit reports on a daily (or weekly in the GOMR) basis. We must have accurate and timely information on the condition of the drilling site to be able to make informed decisions on requests for alternative compliance and departures and for inspection purposes. Respondents maintain the information reported on a daily basis, and the burden of submitting to BSEE is not substantial. Quarterly reporting would be ineffectual.

Forms BSEE-0125, -0133, -0133S, and -0144: If this information were not available, BSEE could not review the status of the well after operations have concluded to determine that acceptable levels of safety and environmental protection have been maintained; or determine where all drilling rigs, workover rigs, and coiled tubing and snubbing units have moved from one location to another. 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;

Respondents are required to submit daily well activity reports in the Pacific and Alaska OCS Regions to timely monitor drilling and well activities. Due to the volume of activity in the GOMR, respondents submit the information on Forms BSEE-0133 and -0133S on a weekly basis. Since a rig is moved whenever they have to drill a well, respondents submit the information on Form BSEE-0144 on occasion.

(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. Obviously 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 April 14, 2014 (79 FR 20897). Also, 30 CFR 250.199 explains that BSEE will accept comments at any time on the IC requirements and burdens of our 30 CFR 250 regulations and associated forms. 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.

We offer the following in response: the commenter has expressed concern over the certification statement we are adding to the forms associated with this collection will be “elevating” the accuracy of information submitted on the forms to “criminal” status. The certification statement on the forms is a standard statement on many Government forms. Anyone who knowingly submits false information to the Government may be subject to civil and criminal penalties even if the statement does not appear on the form. The statement is intended to remind submitters that there are penalties for intentional false statements and BSEE has a range of enforcement options available to ensure the Government has the information it needs to promote safe and environmentally protective operations on the OCS.

Another concern expressed by the commenter was in reference to information/questions on Form BSEE-0123 being unnecessary or already submitted in eWell. With respect to the information submitted on paper forms versus eWell, BSEE has initiated the eWell System for all three BSEE OCS Regions. To date, only the Gulf of Mexico Region has eWell fully operational. With that said, operators/lessees must be given the option to use paper forms until all three BSEE OCS Regions can utilize eWell. Currently 100 percent of all paper forms are being submitted in the Pacific OCS Region and the Alaska OCS Region.

In regards to the commenters concerns about proposed changes to Form BSEE-0125 being redundant with Form BOEM-0140, BSEE agrees this is duplicative information and has removed Nos. 34(a)-Bottom Hole Pressure and 34(b)-Bottom Hole Temperature from Form BSEE-0125.

With respect to the commenter’s concerns that BSEE is significantly underestimating the burden hours associated with Form BSEE-0123-Application for Permit to Drill (APD), BSEE agrees. Between the 60-day FR notice (79 FR 20897, April 14, 2014) associated with this collection and this submission, we removed the APD - BSEE-0123, including a revised APD, Supplemental APD Information Sheet (BSEE-0123S), and those regulatory requirements that were previously associated with this collection. We separated out these requirements and burdens and put them into a separate IC so that both industry and BSEE will have a better understanding of the complexities associated with all the information that is submitted and will reflect more accurate burden estimates. The OMB approved the request, and assigned the APD IC with OMB Control Number 1014-0025 on April 29, 2014. As stated previously, all IC **Federal Register** notices provide an opportunity to comment on the burdens during the 60- and the 30-day comment period, as well as commenting to OMB anytime on the IC burdens. We received no comments during the 60- or 30-day comment period during the APD ICR process.

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

BP Exploration & Production Inc., Ms. Scherie Douglas, Regulatory Compliance Team Lead,
(281) 366-6843, 200 Westlake Park Blvd., wL4, Houston, TX 77079

Freeport-McMoran Oil & Gas, Mr. Gary Hertfelder, Drilling Manager,

(805) 934-8227, 201 S. Broadway, Orcutt, CA 93455-4606

Shell Exploration and Production, Mr. Greg Horner, Principal Scientist,
(907) 770-3700, 3601 C Street, Suite #1000, Anchorage, AK 99503

Anadarko Petroleum Corporation, Ms. Gaylene Reier, Staff Regulatory Analyst,
(832) 636-1000, 1201 Lake Robbins Drive, The Woodlands, TX 77380

All the different reporting and recordkeeping requirements that are listed in the Subpart D 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.

We will protect proprietary information according to the Freedom of Information Act (5 U.S.C. 552) and DOI's implementing regulations (43 CFR Part 2); and under regulations at 30 CFR 250.197, *Data and information to be made available to the public or for limited inspection*; and 30 CFR Part 252, *OCS Oil and Gas Information Program*.

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

The collection does not include sensitive or private questions.

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

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

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

Potential respondents include Federal OCS oil, gas, and sulphur lessees/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 and are based on information discussions with the list of respondents in Section A.8. Responses are mandatory and are submitted generally on occasion, daily, weekly, monthly, quarterly, annually, and varies by section. We estimate the total annual reporting and recordkeeping burden is 102,497 hours.

BURDEN TABLE

Citation 30 CFR 250 Subpart D and NTL(s)	Reporting and Recordkeeping Requirement*	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (rounded)
General Requirements				
402(b)	Request approval to use blind or blind-shear ram or pipe rams and inside BOP.	0.5	352 requests	176
403	Notify BSEE of drilling rig movement on or off drilling location (BSEE-0144).	0.2	BSEE-0144 312 forms	63
404	Perform operational check of crown block safety device; record results (weekly).	0.25	86 drilling rigs x 52 weeks = 4,472 records	1,118
408, 409	Apply for use of alternative procedures and/or departures not requested in BSEE forms (including discussions with BSEE or oral approvals).	Burden covered under 1014-0025.		0
Subtotal			5,136 Responses	1,357 Hours
Apply for a Permit to Drill				
408-418, 420(a)(6); 423(b)(3), (c); 449(j), (k); 456(j); plus in subparts A, B, D, E, H, P, Q.	Submit Application for Permit to Drill (APD Form BSEE-0123 and BSEE-0123S) that includes any/all supporting documentation and requests for various approvals required in subpart D (including §§ 250.425(a), 427, 428, 432, 447(c), 448(b),(c), 451(g), 460, 490(c)) and submitted via the form; upon request, make available to BSEE.	Burden covered under 1014-0025.		0
410(b); 417(b)	Reference Well and site-specific information approved in your Exploration Plan, Development and Production Plan, Development Operations Coordination Document in your APD.	Burdens pertaining to EPs, DPPs, DOCs are covered under BOEM 1010-0151 and APDs are covered under 1014-0025.		0
416(g)(2)	Provide 72 hour advance notice of location of shearing ram tests or inspections; allow BSEE access to witness testing, inspections, and information verification.	0.25	156 notifications	39

Citation 30 CFR 250 Subpart D and NTL(s)	Reporting and Recordkeeping Requirement*	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (rounded)
416(g)(2)	Submit evidence that demonstrates that the Registered Professional Engineer/firm has the expertise and experience necessary to perform the verification(s); allow BSEE access to witness testing; verify info submitted to BSEE.	0.25	733 submittals	184
417(a), (b)	Collect and report additional information on case-by-case basis if sufficient information is not available.	5	46 reports	230
417(c)	Submit 3 rd party review of drilling unit according to 30 CFR 250, subpart I.	Burden covered under 1014-0011.		0
418(e)	Submit welding and burning plan according to 30 CFR 250, subpart A.	Burden covered under 1014-0022.		0
Subtotal			935 Responses	453 Hours
Casing and Cementing Requirements				
420(b)(3)	Submit dual mechanical barrier documentation after installation.	0.75	533 submittals	400
420(b)(3)	Request approval for alternative options to installing barriers.	0.25	58 requests	15
423(a)	Request and receive approval from District Manager for repair.	0.5	86 requests	43
423(b)(4), (c)(2)	Perform pressure casing test; document results and make available to BSEE upon request.	0.75	1,606 tests	1,205
423(c)(5)	Immediately contact District Manager when problem corrected due to failed negative pressure test; submit a description of corrected action taken; and receive approval from District Manager to retest.	1	20 notifications	20
423(c)(7)	Submit documentation of successful negative pressure test in the End of Operations Report (EOR, Form BSEE-0125).	2	BSEE-0125 45 submittals	90
424	Caliper, pressure test, or evaluate casing; submit evaluation results; request approval before resuming operations or beginning repairs (every 30 days during prolonged drilling).	1	68 requests	68
425(a)	Request approval from District Manager to use other test pressures for liners.	Burden covered under 1014-0025.		0
426	Record results of all casing and liner pressure tests.	2	4,259 record results	8,518
427(a)	Record results of all pressure integrity tests and hole behavior observations re-formation integrity and pore pressure.	2	4,226 record results	8,452
Subtotal			10,901 Responses	18,811 Hours
Diverter System Requirements				
434; 467	Perform diverter tests when installed and once every 7 days; actuate system at least once every 24-hour period; record results (average 2 per drilling operation); retain all charts/reports relating to diverter tests/actuators at facility for duration of drilling well.	2	620 records	1,240
Subtotal			620 Responses	1,240 Hours

Citation 30 CFR 250 Subpart D and NTL(s)	Reporting and Recordkeeping Requirement*	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (rounded)
Blowout Preventer (BOP) System Requirements				
442(c)	Request alternative method for the accumulator system.	Burden covered under 1014-0022.		0
442(f)(3)	Demonstrate that your secondary control system will function properly.	5	6 validations	30
442(h)	Label all functions on all panels.	1.5	45 panels	68
442(i)	Develop written procedures for management system for operating the BOP stack and LMRP.	8	39 procedures	312
442(j)	Establish minimum requirements for authorized personnel to operate critical BOP equipment; require training.	Burden covered under 1014-0008.		0
446(a)	Document BOP maintenance and inspection procedures used; record results of BOP inspections and maintenance actions; maintain records for 2 years; make available to BSEE upon request.	3	86 records	258
447(c)	Request approval from District Manager to omit BOP pressure test. Indicate which casing strings and liners meet the criteria of this section.	Burden covered under 1014-0025.		0
449(j)(2)	Notify District Manager at least 72 hours prior to stump/initial test on seafloor.	0.25	150 notifications	38
449(j)(3)	Document all ROV intervention function test results; make available to BSEE upon request.	1	150 tests	150
449(k)	Document all autoshear and deadman function test results for your subsea BOP systems; make available to BSEE upon request.	Burden covered under 1014-0025.		0
450; 467	Document and record BOP pressure tests results, actuations, and inspections; at a minimum every 14 days; as stated for components; sign as correct. Retain all records, including charts, reports, and referenced documents for the duration of drilling the well.	11	236 test results	2,596
451(c)	Record reason for postponing BOP test (on occasion—approx. 2/year) in driller's report.	0.25	86 records	22
451(g)	Demonstrate that well control procedures/well conditions will not place demands above its rating working pressure and obtain approval from District Manager.	Burden covered under 1014-0025.		0
Subtotal			798 Responses	3,474 Hours
Drilling Fluid Requirements				
456(b), (i)	Document/record in the driller's report every time you circulate drilling fluid; results of drilling fluid tests.	1	4,160 records	4,160
456(c), (f)	Perform various calculations; post calculated drill pipe, collar, and drilling fluid volume; as well as maximum pressures.	1	4,259 postings	4,259
456(j)	Submit detailed step-by-step procedures describing displacement of fluids with your APD (this submittal obtains District Manager approval).	Burden covered under 1014-0025.		0
458(b)	Record daily drilling fluid and materials inventory in drilling fluid report.	0.5	30,295 records	15,148

Citation 30 CFR 250 Subpart D and NTL(s)	Reporting and Recordkeeping Requirement*	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (rounded)
459(a)(3)	Request exception to procedure for protecting negative pressure area.	Burden included under 1014-0022.		0
Subtotal			38,714 Responses	23,567 Hours
Other Drilling Requirements				
449(j); 460; 465; plus in A, D, E, F, H, P, and Q	Provide revised plans and the additional supporting information required by the cited regulations when you submit an Application for Permit to Modify (APM) (Form BSEE-0124) to BSEE for approval; or a Revised APM.	Burden covered under 1014-0026.		0
420(b)(3); 423(b)(7); 465(a); plus various ref in A, E, F, and P	Submit Form BSEE-0125, End of Operations Report (EOR), and additional supporting information as required by the cited regulations.	2	BSEE-0125 279 submittals	558
460	Submit plans and obtain approval to conduct well test; notify BSEE before test.	Burden covered under 1014-0025.		0
461(a-b); 466(e); 468(a); NTL	Record and submit well logs and surveys run in the wellbore and/or charts of well logging operations (including but not limited to).	3	302 logs/surveys	906
	Record and submit directional and vertical-well surveys.	1	302 reports	302
	Record and submit velocity profiles and surveys.	1	45 reports	45
	Record and submit core analyses.	1	130 analyses	130
461(e)	Provide copy of well directional survey to affected leaseholder.	0.75	11 occasions	9
462(a)	Prepare and post well control drill plan for crew members.	0.5	314 plans	157
462(c)	Record results of well-control drills.	1	8,632 results	8,632
463(b)	Request field drilling rules be established, amended, or canceled.	4	6 requests	24
465(a)(1) 428, 449(j) & k(1), 456(j)	Obtain approval to revise your drilling plan or change major drilling equipment by submitting a revised BSEE-0123, Application for Permit to Drill and BSEE-0123S, Supplemental APD Information Sheet.	Burden covered under 1014-0025.		0
Subtotal			10,021 Responses	10,763 Hours
Applying for a Permit to Modify and Well Records				
466, 467	Retain drilling records for 90 days after drilling is complete; retain casing/liner pressure, diverter, and BOP records for 2 years; retain well completion/well workover until well is permanently plugged/abandoned or lease is assigned.	2.15	3,526 records	7,581
468(b); 465(b)(3)	In the GOM OCS Region, submit drilling activity reports weekly on Forms BSEE-0133 (Well Activity	1	BSEE-0133 4,160 submittals	4,160

Citation 30 CFR 250 Subpart D and NTL(s)	Reporting and Recordkeeping Requirement*	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (rounded)
	Report) and BSEE-0133S (Bore Hole Data) and supporting information. (The burden includes approximately 1 hour per response for filling out these forms.)	1	BSEE-0133S 4,160 submittals	4,160
468(c)	In the Pacific and Alaska OCS Regions during drilling operations, submit daily drilling reports. N/A in GOM.	1	33 wells x 365 days x 20% year = 2,409 reports	2,409
469; NTL	As specified by region, submit well records, paleontological interpretations or reports, service company reports, and other reports or records of operations.	1.5	341 submissions	512
Subtotal			14,596 Responses	18,822 Hours
Hydrogen Sulfide				
490(c), (d)	Submit request for reclassification of H ₂ S zone; notify BSEE if conditions change.	Burden covered under 1014-0025.		0
490(f); also in 418(d)	Submit contingency plans for operations in H ₂ S areas (16 drilling, 6 work-over, 6 production).	30	28 plans	840
490(g)	Post safety instructions; document training; retain records at facility where employee works; train on occasion and/or annual refresher (approx. 2/year).	4	34 records	136
490(h)(2)	Document and retain attendance for weekly H ₂ S drills and monthly safety mtgs until operations completed or for 1 year for production facilities at nearest field office.	2	2,514 records	5,028
490(i)	Display warning signs—no burden as facilities would display warning signs and use other visual and audible systems.			0
490(j)(7-8)	Record H ₂ S detection and monitoring sensors during drilling testing and calibrations; make available upon request.	4	4,328 records	17,312
490(j)(12)	Propose alternatives to minimize or eliminate SO ₂ hazards—submitted with contingency plans—burden covered under § 250.490(f).			0
490(j)(13) (vi)	Label breathing air bottles—no burden as supplier normally labels bottles; facilities would routinely label if not.			0
490(l)	Notify without delay of unplanned H ₂ S releases (approx. 2/year).	Oral 0.2	24 notifications	5
		Written 5	24 written reports	120
490(o)(5)	Request approval to use drill pipe for well testing.	2	4 requests	8
490(q)(1)	Seal and mark for the presence of H ₂ S cores to be transported—no burden as facilities would routinely mark transported cores.			0
490(q)(9)	Request approval to use gas containing H ₂ S for instrument gas.	2	2 requests	4
490(q)(12)	Analyze produced water disposed of for H ₂ S content and submit results to BSEE.	3	164 submittals	492
Subtotal			7,122 Responses	23,945 Hours
Miscellaneous				

Citation 30 CFR 250 Subpart D and NTL(s)	Reporting and Recordkeeping Requirement*	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (rounded)
400-490	General departure or alternative compliance requests not specifically covered elsewhere in subpart D.	2	30 requests	60
NTL	Voluntary submit to USCG read only access to the EPIRB data for their moored drilling rig fleet before hurricane season.	.25	80 submittals	20
Subtotal			110 Responses	80 Hours
TOTAL BURDEN			88,953 Responses	102,512 Hours

* The forms mentioned in this collection, for the most part, are currently submitted electronically using eWell. In the future, BSEE will be allowing the option of electronic reporting for certain requirements not necessarily associated with a form.

(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. This cost is broken out in the following table using the Society of Petroleum Engineers data dated September 2013. See SPE document/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 14-1075, June 11, 2014 (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 \$13,224,048 (\$129 x 102,512 hours = \$13,224,048).

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 not identified any 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 \$76/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/2014/general-schedule/>).

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	\$45	\$68	60%	\$41
Supv. Petroleum Engineer	GS-15/5	\$62	\$93	35%	\$33
Weighted Average (\$/hour)					\$76

*A multiplier of 1.5 (as implied by BLS news release USDL 14-1075, June 11, 2014 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

To analyze and review the information respondents submit for subpart D, we estimate the Government will spend an average of approximately 0.5 hours for each hour spent by lessees. Based on a cost factor of \$76 per hour, the annual burden on the Government for the regulatory requirements in this collection is \$3,895,456 (102,512 burden hours x 0.5 hours = 51,256 hours x \$76 = \$3,895,456).

Also, under §§ 250.461, 468, and 469, respondents are required to record and submit logs, surveys, analyses etc. The BSEE has contracted out to A2D Technologies, dba TGS, for receiving the mentioned data, doing compliance reviews on the data, and for reformatting the data for easier use for BSEE. This contract costs \$500,000 per year, which BSEE splits with BOEM. Therefore, the cost to BSEE is \$250,000.

Therefore, the total annual burden on the Government is \$4,145,456 (\$3,895,456 for the regulatory burden costs + \$250,000 for the A2D contract = \$4,145,456).

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

(a) Hour Burden: The current OMB inventory includes 216,211 burden hours. In this submission, we are requesting a total of 102,512 hours. This represents a program decrease of 120,932 burden hours and an adjustment increase of 7,233 burden hours.

The program decrease is as a result of removing APDs (1014-0025) and APMs (1014-0026) from this collection into their own respective collections; see **NOTE** on page 1. The adjustment increase is due to re-estimating the average number of annual responses and the amount of time required to respond based on consultations listed in A.8.

(b) Non-Hour Cost Burden: The current OMB inventory is \$2,225,286. In this submission, we are requesting a total of \$0.00, which represents a program decrease of \$2,225,286. Between the 60-day FR Notice and this submission, we separated APDs and APMs, which have cost recovery fees (non-hour cost burdens), into their own respective collections (see **NOTE** on page 1).

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 on Forms BSEE-0125, BSEE-0133, BSEE-0133S, and BSEE-0144, and elsewhere appropriately.

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.”