

Justification for Non-substantive Change
ICR Ref No.: 201404-1014-002

This submission requests an adjustment change, based on a comment received on a FR Notice (78 FR 48890, August 12, 2013) questioning the cost for audits pertaining to SEMS (1014-0017). The commenter stated that BSEE's audit cost estimates were significantly lower than what industry actually pays. Since SEMS audits have officially been implemented, based on experience of independent third party auditors, we now have a more accurate representation of these said costs. Since these audit costs will affect proposed rulemaking in the Arctic, we are requesting an adjustment increase for 30 CFR 250.1920(a),(b) and 1921 of + \$7,637,000 (new total would be \$8,611,000) and an adjustment increase for 30 CFR 250.1925(a) of \$557,000 (new total would be \$833,000). These adjustments would make the total annual cost burden for this collection \$9,444,000.