

Supporting Statement A
30 CFR Part 250, Subpart A, General
Forms BSEE-0011, -0132, -0143, -1832
OMB Control Number 1014-0022
Current Expiration Date: September 30, 2015

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.

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, 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. A request for approval required in 30 CFR 250.171(e) is subject to cost recovery, and BSEE regulations specify service fees for these requests in 30 CFR 250.125.

These authorities and responsibilities are among those delegated to BSEE. The regulations at 30 CFR Part 250, Subpart A, concern the general regulatory requirements of oil, gas, and sulphur operations in the OCS (including the associated forms), 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 collected under the Subpart A regulations to ensure that operations on the OCS are carried out in a safe and pollution-free manner, do not interfere with the rights of other users on the OCS, and balance the protection and development of OCS resources. Specifically, we use the information collected to:

- Review records of formal crane operator and rigger training, crane operator qualifications, crane inspections, testing, and maintenance to ensure that lessees/operators perform operations in a safe and workmanlike manner and that equipment is maintained in a safe condition. The BSEE also uses the information to make certain that all new and existing cranes installed on OCS fixed platforms must be equipped with anti-two block safety devices, and to assure that uniform methods are employed by lessees for load testing of cranes.
- Review welding plans, procedures, and records to ensure that welding is conducted in a safe and workmanlike manner by trained and experienced personnel.
- Provide lessees/operators greater flexibility to comply with regulatory requirements through approval of alternative equipment or procedures and departures to regulations if they demonstrate equal or better compliance with the appropriate performance standards.
- Ensure that injection of gas promotes conservation of natural resources and prevents waste.
- Record the agent and local agent empowered to receive notices and comply with regulatory orders issued.
- Provide for orderly development of leases through the use of information to determine the appropriateness of lessee/operator requests for suspension of operations, including production.
- Improve safety and environmental protection on the OCS through collection and analysis of accident reports to ascertain the cause of the accidents and to determine ways to prevent recurrences.

- Ascertain when the lease ceases production or when the last well ceases production in order to determine the 180th day after the date of completion of the last production. The BSEE will use this information to efficiently maintain the lessee/operator lease status.
- Allow lessees/operators who exhibit unacceptable performance an incremental approach to improving their overall performance prior to a final decision to disqualify a lessee/operator or to pursue debarment proceedings through the execution of a performance improvement plan (PIP). The Subpart A regulations do not address the actual process that we will follow in pursuing the disqualification of operators under §§ 250.135 and 250.136; however, our internal enforcement procedures include allowing such operators to demonstrate a commitment to acceptable performance by the submission of a PIP.

This information collection request also has current forms and a new form associated with the collection. We have addressed any and all issues/changes to the forms in the following paragraphs.

New Form BSEE-0011, *iSEE*, Internet-Based Safety and Environmental Enforcement Reporting System, was created to clarify what information is needed when someone reports an apparent violation (§ 250.193). This form was out for comment and published in the **Federal Register** on November 18, 2013 (78 FR 69118) and on March 26, 2014 (79 FR 16810). We received two comments from the same individual about this new form and our response is in A.8.

Revisions to Form BSEE-1832, *Incidents of Noncompliance(s)*, are due to BSEE developing a new electronic process to issue INCs and handle acknowledgements of INCs. The changes on the form pertain to giving the operator options on how to report back to BSEE for reporting the resolution of the issues identified in the INC, either via paper or electronically. The BSEE will continue the option to issue paper INCs and mail paper INCs; however, our inspectors will stop issuing hand-written INCs for most normal inspection violations and, instead, generate an INC on the inspector's tablet PCs. After marking a Preliminary-INC as a violation, the inspector will be able to generate an INC on the tablet and ask the operator to "sign" the tablet. The application will capture the signature and the inspector will generate the INC in PDF format.

Form BSEE-0011, iSEE.

- The BSEE-0011, iSEE form will be an internet based form that anyone can use. The purpose of iSEE is to provide members of the offshore oil and gas industry, as well as the public, with the ability for the electronic reporting of suspected violations of, or noncompliance with, any and all safety or environmentally-related laws or regulations; as well as any violations of or noncompliance with any associated lease, plan, or permit requirements that occur offshore. The BSEE will use this information to investigate potential violations related to OCS activities.

Information on Form BSEE-0011 - The first 4 parts of the form are optional and for the purposes of asking follow-up questions if necessary.

- Last Name
- First Name
- E-mail Address
- Phone number

- The Category of Information section is used to specify what type of potential violation is being reported so that it can be routed internally to the appropriate BSEE personnel.

- The Region section is used to specify which region the potential violation occurred in so that it can be routed internally to the appropriate BSEE personnel.

- The Location Information provides BSEE with the ability to locate (using various data options as entered by the reporting party) where the potential violation took place.

- Company Name
- Area Block
- Lease Number
- Production Facility Name
- Drilling Rig Name
- GPS Coordinate Latitude and Longitude
- Date of Offense
- Other

- A Detailed Description of Problem or Event is used to facilitate BSEE in determining whether the potential violation warrants an investigation.

In this ICR, we have included a certification on all the following forms to reflect that false statements may be subject to criminal penalties.

Form BSEE-0132, Hurricane and Tropical Storm Evacuation and Production Curtailment Statistics (GOMR).

• Be informed when there could be a major disruption in the availability and supply of natural gas and oil due to natural occurrences/hurricanes, to advise the U.S. Coast Guard (USCG) in case of the need to rescue offshore workers in distress, to monitor damage to offshore platforms and drilling rigs, and to advise the news media and interested public entities when production is shut-in and when resumed. The Gulf of Mexico OCS Region (GOMR) uses Form BSEE-0132, *Hurricane and Tropical Storm Evacuation and Production Curtailment Statistics*, for respondents to report evacuation statistics when necessary. This form requires the respondent to submit general information such as company name, contact, date, time, telephone number, as well as number of platforms and drilling rigs evacuated and not evacuated. We also require production shut-in statistics for oil (BOPD) and gas (MMSCFD).

Form BSEE-0143, Facility/Equipment Damage Report.

• Assists lessees, lease operators, and pipeline right-of-way holders when reporting damage by a hurricane, earthquake, or other natural phenomenon. They are required to submit an initial damage report to the Regional Supervisor within 48 hours after completing the initial evaluation of the damage and then, subsequent reports, monthly and immediately, whenever information changes until the damaged structure or equipment is returned to service. Information on the form includes - instructions, general information, a description of the damage, an initial damage assessment, production rate at time of shut-in (BPD and/or MMCFPD), cumulative production shut-in (BPD and/or MMCFPD), and estimated time to return to service (in days).

Form BSEE-1832, Notification of Incident(s) of Noncompliance.

• Determine that respondents have corrected all Incident(s) of Noncompliance (INCs), identified during inspections. Everything on the INC form is filled out by a BSEE inspector/representative. The only

thing industry does with this form is sign the document upon receipt and respond to BSEE when each INC has been corrected, no later than 14 days from the date of issuance.

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 90 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 DOI has several Memoranda of Understanding (MOU) that define the responsibilities of each agency with respect to activities in the OCS. These MOU are effective in avoiding duplication of regulations and reporting requirements. The information collected in Subpart A is specific to a lease, a lessee/operator, or a particular request for BSEE approval and is unique to the site and well operation. Except for accident/incident reporting, we are unaware of any duplication or similar information collected by other Federal agencies. In relation to reporting on iSEE, information collected is specific to the reporting of suspected violations of, or noncompliance with, any and all safety or environmentally-related laws or regulations, as well as any violations of or noncompliance with any associated lease, plan, or permit requirements that occur offshore. The information will be used by BSEE to investigate potential violations related to OCS activities.

With respect to accident/incident reporting, BSEE believes that it is imperative to upgrade our investigation analysis functions to ensure safety of OCS operations. The U.S. Coast Guard currently collects information on incidents onshore and offshore. However, their reports generally are not conducive to in-depth analysis for OCS drilling and production facilities and do not contain the detail necessary to adequately describe accidents/incidents occurring at these facilities.

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 these OCS lessees and operators may have less than 500 employees and would be considered small businesses as defined by the Small Business Administration. Regulations require safe work practices and protection of the environmental resources; therefore, the hour burden on any small entity subject to these regulations and associated collections of information cannot be reduced to accommodate them.

It should be noted that the OCS Lands Act and these implementing regulations (§ 250.196) require us to reimburse respondents for their costs of reproduction and processing of data and information that BSEE requests. We also pay respondents if they request reimbursement, within 90 days of the inspection, for food, quarters, or transportation they provide BSEE representatives (§ 250.133) during inspections.

These reimbursements eliminate a cost burden on both small and large businesses.

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 we did not collect the information, BSEE would be unable to effectively carry out the mandate of the OCS Lands Act and administer the offshore program with regard to granting suspensions of operations and production, conserving resources through the injection of gas, reimbursing certain costs, monitoring accident reports, reviewing crane records, or allowing lessees greater flexibility in the manner in which they comply with the requirements of regulations under 30 CFR 250 through the adoption of performance standards. Information is collected only once for each particular event, except for the daily reporting during a natural disaster discussed in A.7. The iSEE information is incident-based and voluntary; therefore, less frequent collection of all the information relating to this subpart is not applicable.

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;

Two forms need to be filled out and submitted more often than quarterly in the event of a natural disaster (such as hurricanes or earthquakes) based on the requirements in § 250.192: (a) a storm which would make it necessary to evacuate platforms or rigs or to shut-in production, requires daily reporting (Form BSEE-0132, *Hurricane and Tropical Storm Evacuation and Production Curtailment Statistics*, used in the GOMR) during the emergency situation. The reporting requirement would cease when the emergency ended; and (b) Form BSEE-0143, *Facility/Equipment Damage Report*, requires an initial report within 48 hours after the respondent has evaluated the initial damage; then monthly reports until the structure and/or equipment is returned to service. Quarterly reporting would be ineffective for this situation.

Information on Form BSEE-0011, *iSEE*, is collected on occasion of the activity with no set frequency. Respondents generally submit the relevant information as a result of situations encountered and not at any fixed or prescribed interval.

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

Respondents are required to return copies of/or electronically submit Form BSEE-1832, INC(s), to BSEE within 14 days from the date of issuance. The BSEE issuing office cannot complete the records for an inspection until BSEE receives an acknowledgment of the INC(s). Historical records indicate that 14 days is a reasonable time for returning the green copy to the BSEE issuing office and correcting most of the INCs cited. In addition, because INCs generally impact the safety of personnel, equipment, or the environment, they need to be corrected in an expeditious manner. To return the rig or facility to compliant status, 2 weeks is a reasonable timeframe.

(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;

Section 250.108(e) clarifies that design and construction records are kept for the life of the crane, including installation records for any anti-two block safety devices. Respondents retain crane operator and rigger qualifications; as well as, inspections, testing, and maintenance records for 4 years at the OCS fixed platform. Retaining this information for the life of the crane at the fixed offshore platform is critical to determining its current safety, probable strength, and integrity, based on its history. As equipment ages, access to all aspects of its inspections, design, maintenance, testing, etc., is necessary to determine whether standards for safety are maintained. The type of information collected is such that it is not unreasonable to expect that respondents would retain it as usual and customary business practice, even if not required in regulations. Crane operators must receive appropriate training every 4 years, and this record retention period allows the records to be available through appropriate refresher training. The requirement is also consistent with the American Petroleum Institute's Recommended Practice 2D, a document incorporated by reference in our regulations (§ 250.198), and specifies this timeframe. Section 250.109 requires respondents to retain copies of welding plans, approval letters, and drawings indicating the designated safe-welding areas at the site where welding occurs. These are ongoing activities, and the approved plans must remain available for reference when needed to safely conduct these activities.

(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 March 26, 2014 (79 FR 16810). Also, 30 CFR 250.199 and the Paperwork Reduction Act statement on Forms BSEE-0011, -0132, -0143, and -1832 explains that we 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. Between the last collection submitted and this collection, we received one comment from a private citizen concerning BSEE not having any options for electronic submission of Forms BSEE-0132 and BSEE-0143. Our response: An electronic option does exist. The BSEE provides a secure alternative for operators to report the information required on BSEE-0132 and BSEE-0143 in eWell.

Form BSEE-0011, iSEE, was out for comment and published in the Federal Register on November 18, 2013 (78 FR 69118); and on March 26, 2014 (79 FR 16810). We received two comments from a private citizen (submitted same comment for both 60-day notices) that Form BSEE-0011 should include the same or something similar as admonition to the reporter against false reporting. Our response: The BSEE would like some kind of a report of what individuals have encountered. There could be situations in which people think they saw something but aren't sure - we still would like them to report so BSEE can further investigate. With the statement on the form, we feel that this would deter individuals from reporting. Even without the statement on the form, the individuals/submitters are still subject to penalties for false statements, so we could still penalize any abuse or malicious intent of the system.

To prepare this information collection renewal request, companies were contacted to determine the estimated burden Subpart A places on respondents. The following company representatives that commented were:

Shell Exploration and Production Company, Rian Riche, Regulatory Affairs, (504) 728-6012, One Shell Square, 701 Poydras Street, New Orleans, Louisiana 70139

Fieldwood Energy, Cheryl Powell, Regulatory Manger, (713) 969-1309, 2000 W. Sam Houston Parkway South, Houston, Texas 77042

Chevron North America Exploration and Production Company, Joe Gordon, HES Regulatory Specialist, (985) 773-6769, 100 Northpark Boulevard, Covington, Louisiana 70433

Exxon Mobil, Brandon Riley, Senior Regulatory Specialist, (713) 431-1251, CORP-WGR-1074 PO Box 4358, Houston, Texas 77210-4358

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

We reimburse respondents for their costs of reproduction and processing of certain data and information requested by BSEE. The implementing regulations (§ 250.196) comply with the Act and provide for reimbursement payment of G&G information when applicable. We will also pay respondents if they request reimbursement, within 90 days of the inspection, for food, quarters, or transportation they provide to BSEE representatives during inspections (§ 250.133). We do not provide gifts to respondents.

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 burdens.

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. Submissions are generally on occasion, daily, monthly, and vary by section. Most responses are mandatory, while others are required to obtain or retain benefits, or voluntary. We estimate the total annual burden is 84,391 hours. Refer to the following table for a breakdown of the burdens.

BURDEN BREAKDOWN

Citation 30 CFR 250 Subpart A; Related Forms/NTLs	Reporting or Recordkeeping Requirement*	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (rounded)
		Non-Hour Cost Burdens		
Authority and Definition of Terms				
104; Form BSEE-1832	Appeal orders or decisions; appeal INCs.	Exempt under 5 CFR 1320.4(a)(2), (c).		0
Performance Standards				
109(a); 110	Submit welding, burning, and hot tapping plans.	4	51 plans	204

118; 121; 124	Apply for injection of gas; use BSEE-approved formula to determine original gas from injected.	10	6 applications	60
Subtotal			57 Responses	264 Hours
Cost Recovery Fees				
125; 126	Cost Recovery Fees, confirmation receipt, etc.; verbal approvals pertaining to fees.	Cost Recovery Fees and related items are covered individually throughout Subpart A.		0
Forms				
130-133 (Form BSEE-1832)	Submit "green" response copy of Form BSEE-1832, INC(s), indicating date violations corrected; or submit same info via electronic reporting.	3	2,764 forms	8,292
186(a)(3); NTL	Apply to receive administrative entitlements to eWell (electronic/digital form submittals).	Not considered information collection under 5 CFR 1320.3(h)(1).		0
192 (Form BSEE-0132)	Daily report of evacuation statistics for natural occurrence/hurricane (GOMR Form BSEE-0132 (form takes 1 hour)) when circumstances warrant; inform BSEE when you resume production.	3	884 reports or forms	2,652
192(b) (Form BSEE-0143)	Use Form BSEE-0143 to submit an initial damage report to the Regional Supervisor.	3	4 forms	12
192(b) (Form BSEE-0143)	Use Form BSEE-0143 to submit subsequent damage reports on a monthly basis until damaged structure or equipment is returned to service; immediately when information changes; date item returned to service must be in final report.	1	4 forms	4
193 (Form BSEE-0011)	Report apparent violations or non-compliance on Form BSEE-0011.	1.5	6 reports	9
Subtotal			3,662 Responses	10,969 Hours
Inspection of Operations				
130-133	Request reconsideration from issuance of an INC.	7	222 requests	1,554
	Request waiver of 14-day response time.	1	296 waivers	296
	Notify BSEE before returning to operations if shut-in.	1	2,026 notices	2,026
133, NTL	Request reimbursement within 90 days of inspection for food, quarters, and transportation, provided to BSEE representatives. Submit supporting verifications of the meals, such as a meal log w/inspectors signature.	1.5	2 requests	3
Subtotal			2,546 Responses	3,879 Hours
Disqualification				
135 BSEE internal process	Submit PIP under BSEE implementing procedures for enforcement actions.	40	4 plans	160
Subtotal			4 Responses	160 Hours
Special Types of Approval				
140	Request various oral approvals not specifically covered elsewhere in regulatory requirements.	2	346 requests	692
140(c)	Submit letter when stopping approved flaring with required information.	Burden covered under 30 CFR Part 250, Subpart K (1014-0019).		0
141; 198	Request approval to use new or alternative procedures, along with supporting documentation if applicable, including BAST not specifically covered elsewhere in regulatory requirements.	22	1,430 requests	31,460

142; 198	Request approval of departure from operating requirements not specifically covered elsewhere in regulatory requirements, along with supporting documentation if applicable.	3.5	405 requests	1,418
145	Submit designation of agent and local agent for Regional Supervisor' and/or Regional Director's approval.	1	9 submittals	9
Subtotal			2,190 Responses	33,579 Hours
Naming and Identifying Facilities and Wells (Does Not Include MODUs)				
150; 151; 152; 154(a)	Name and identify facilities, artificial islands, MODUs, helo landing facilities etc., with signs.	4	597 new / replacement signs	2,388
150; 154(b)	Name and identify wells with signs.	2	286 new wells	572
Subtotal			883 Responses	2,960 Hours
Suspensions				
168; 171; 172; 174; 175; 177; 180(b), (d)	Request suspension of operation or production; submit schedule of work leading to commencement; supporting information; include pay.gov confirmation receipt.	10	646 requests	6,460
		\$2,123 fee x 646 = \$1,371,458		
	Submit progress reports on a suspension of operation or production as condition of approval.	3	335 reports	1,005
172(b); 177(a)	Conduct site-specific study; submit results; request payment by another party. No instances requiring this study in several years--could be necessary if a situation occurred such as severe damage to a platform or structure caused by a hurricane or a vessel collision.	100	1 study / report	100
177(b), (c), (d)	Various references to submitting new, revised, or modified exploration plan, development/production plan, or development operations coordination document.	Burden covered under BOEM's 30 CFR Part 550, Subpart B (1010-0151).		0
Subtotal			982 Responses	7,565 Hours
			\$1,371,458 Non-Hour Cost Burden	
Primary Lease Requirements, Lease Term Extensions, and Lease Cancellations				
180(a), (h), (i)	Notify and submit report on various lease-holding operations and lease production activities.	1	63 reports or notices	63
180(e), (j)	Request more than 180 days to resume operations; notify BSEE if operations do not begin within 180 days.	3	3 requests/ notifications	9
		0.5		2
180(f), (g), (h), (i)	Submit various operation and production data to demonstrate production in paying quantities to maintain lease beyond primary term; notify BSEE when you begin conducting operations beyond its primary term.	3	384 submissions / notifications	1,152
		0.5		192
Subtotal			450 Responses	1,418 Hours
Information and Reporting Requirements				
186; NTL	Submit information and reports, as BSEE requires.	12	202 Submittals	2,424
	Report to the District Manager immediately via oral communication and written follow-up within 15-calendar days, incidents pertaining to: fatalities; injuries; LoWC; fires; explosions; all collisions resulting in property or equipment damage >\$25K; structural damage to an OCS facility; cranes; incidents	1.5 Oral	505 Oral reports	758

187; 188(a-b); 189; 190; 192; NTL	that damage or disable safety systems or equipment (including firefighting systems); include hurricane reports such as platform/rig evacuation, rig damage, P/L damage, and platform damage; operations personnel to muster for evacuation not related to weather or drills; any additional information required. If requested, submit copy marked as public information.	4 Written	671 Written reports	2,684
187(d)	Report all spills of oil or other liquid pollutants.	Burden covered under 30 CFR Part 254 (1014-0007).		0
188(a)(5)	Report to District Manager hydrogen sulfide (H2S) gas releases immediately by oral communication.	Burden covered under 30 CFR Part 250, Subpart D (1014-0018).		0
191	Submit written statement/Request compensation mileage and services for testimony re: accident investigation.	Exempt under 5 CFR 1320.4(a)(2), (c).		0
194(c)	Report archaeological discoveries.	3	7 reports	21
195	Notify District Manager within 5 workdays of putting well in production status (usually oral). Follow-up with either fax/email within same 5 day period (burden includes oral and written).	1	2,040 notifications	2,040
196	Request reimbursement of reproduction and processing costs of G&G data/information requested by the Regional Director.	1	1 request	1
197(c)	Submit confidentiality agreement.	1	1 submittal	1
Subtotal			3,427 Responses	7,929 Hours
Recordkeeping				
108(e)	Retain records of design and construction for life of crane, including installation records for any anti-two block safety devices; all inspection, testing, and maintenance for at least 4 years; crane operator and all rigger personnel qualifications for at least 4 years; all records must be kept at the OCS fixed platform.	4	2,011 record-keepers	8,044
109(b); 113(c)	Retain welding plan and drawings of safe-welding areas at site; designated person advises in writing that it is safe to weld.	3	948 operations	2,844
132(b)(3)	During inspections, make records available as requested by inspectors.	4	1,195 requests	4,780
Subtotal			4,154 Responses	15,668 Hours
TOTAL BURDEN			18,355 Responses	84,391 Hours
			\$1,371,458 Non-Hour Cost Burden	

* In the future, BSEE will be allowing the option of electronic reporting for certain requirements.

(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.

The average respondent cost is \$115/hour. This cost is broken out in the following table using the Society of Petroleum Engineers (SPE) data dated September 2013. See SPE document/website: <http://www.spe.org/career/docs/13SalarySurveyHighlights.pdf>.

Position	Hourly Pay rate (\$/hour estimate)	Hourly Pay Rate (including benefits) (1.4* x \$/hour)	Percent of time spent on collection	Weighted Average (\$/hour/rounded)
Administrative/Support Staff	\$54	\$76	10%	\$8
Regulatory	\$72	\$101	50%	\$51
Geologist	\$95	\$133	15%	\$20
Engineer	\$103	\$144	25%	\$36
Weighted Average (\$/hour)				\$115

* A multiplier of 1.4 (as implied by BLS news release USDL-14-0390, March 12, 2014 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)), was added for benefits.

Based on a cost factor of \$115 per hour, we estimate the hour burden as a dollar equivalent is \$9,704,965 (\$115 x 84,391 hours = \$9,704,965).

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 reflected in Item 12).

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

We have identified one non-hour cost burden. Requests for a Suspension of Operation or a Suspension of Production (§ 250.171) requires a cost recovery fee of \$2,123. We have not identified any other non-hour cost burdens associated with this collection of information. We estimate a total reporting non-hour cost burden of \$1,371,458. Refer to the table in Section A.12 of this supporting statement for the specific non-hour paperwork cost burden breakdown.

(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. Not applicable in this collection.

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 \$62/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 (<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-5/5	\$17	\$26	4%	\$1
Technician(s)	GS-11/5	\$31	\$47	25%	\$12
Engineer(s)	GS-13/5	\$45	\$68	65%	\$44
Supervisory Engineer	GS-14/5	\$53	\$80	6%	\$5
Weighted Average (\$/hour)					\$62

*A multiplier of 1.5 (as implied by BLS news release USDL-14-0390, March 12, 2014 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

To analyze and review the information required by 30 CFR Part 250, Subpart A, we estimate the Government will spend an average of approximately 0.75 hour for each hour spent by lessees. Based on a cost factor of \$62 per hour, the annual burden on the Government for the regulatory requirements in this collection is \$3,924,166 (84,391 burden hours x 0.75 hour = 63,293 (rounded) hours x \$62 = \$3,924,166).

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

(a) The current OMB inventory for this collection includes 50,859 burden hours. In this submission, we are requesting a total of 84,391 hours. This represents an adjustment increase of 33,532 hours. The majority of this increase is due to the previous mislabeling of submissions, required in §§ 250.141 and 250.142, into our electronic data system. After the Macondo Event, BSEE scrutinized very closely which submittals were actual departures verses alternative procedures. This is primarily, why the burden for § 250.141 increased (+21,660). Also, we are adding Form BSEE-0011 to this collection, which includes 9 annual burden hours due to agency discretion.

(b) The current OMB non-hour cost burden inventory is \$3,268,848. In this submission, we are requesting a total of \$1,371,458. This represents an adjustment decrease of \$1,897,390. The decrease is due to re-estimating the average number of annual responses times its associated non-hour cost burden.

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 expiration date on Forms BSEE-0011, -0132 and -0143. Form BSEE-1832 will display the current OMB control number, but will not display the OMB expiration date since it is professionally printed in quadruplicate and it is not cost effective to reprint every 3 years.

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.”