

**Supporting Statement A for Paperwork Reduction Act Submissions**  
**30 CFR 551, Geological and Geophysical (G&G)**  
**Explorations of the Outer Continental Shelf**  
**Form BOEM-0327**  
**OMB Control Number 1010-0048**  
**Current Expiration Date: January 31, 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**

**A. Justification**

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

The Outer Continental Shelf (OCS) Lands Act, as amended (43 U.S.C. 1331 *et seq.* and 43 U.S.C. 1801 *et seq.*), authorizes the Secretary of the Interior to prescribe rules and regulations to administer leasing of mineral resources on the OCS.

The OCS Lands Act (43 U.S.C. 1340) also states that "any person authorized by the Secretary may conduct geological and geophysical explorations in the [O]uter Continental Shelf, which do not interfere with or endanger actual operations under any lease maintained or granted pursuant to this subchapter, and which are not unduly harmful to aquatic life in such area." The section further requires that permits to conduct such activities may only be issued if it is determined that the applicant is qualified; the activities do not result in pollution or create hazardous or unsafe conditions; they do not unreasonably interfere with other uses of the area or disturb a site, structure, or object of historical or archaeological significance. Applicants for permits are required to submit form BOEM-0327 to provide the information necessary to evaluate their qualifications, and, upon approval, respondents are issued a permit. Also, as a Federal agency, we have a continuing affirmative duty to comply with the National Environmental Policy Act (NEPA), Endangered Species Act (ESA), and Marine Mammal Protection Act (MMPA). This includes a substantive duty to carry out any agency action in a manner that is not likely to jeopardize protected species as well as a procedural duty to consult with the Fish and Wildlife Service (FWS) and National Oceanic and Atmospheric Administration Fisheries (NOAA Fisheries) before engaging in a discretionary action that may affect a protected species.

The OCS Lands Act (43 U.S.C. 1352(a)(1)(C)) requires that certain costs be reimbursed to the parties submitting required G&G information and data. Under the OCS Lands Act, permittees are to be

reimbursed for the costs of reproducing any G&G data required to be submitted. Permittees are to be reimbursed also for the reasonable cost of processing geophysical information required to be submitted when processing is in a form or manner required by the Director, BOEM, and is not used in the normal conduct of the business of the permittee.

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 the OMB Circular A-25, authorize Federal agencies to recover the full cost of services that confer special benefits. All G&G permits are subject to cost recovery, and BOEM regulations specify service fees for these requests.

Regulations to carry out these responsibilities are contained in 30 CFR 551 and are the subject of this information collection renewal. In this renewal, we are including the estimated G&G permit applications and information that will be submitted for the Atlantic OCS. As a result of the BOEM Record of Decision regarding G&G survey activities on the Mid- and South Atlantic OCS (issued July 23, 2014 (79 FR 42815)), BOEM will now consider G&G permit applications for this area.

***2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.***

BOEM uses the information to ensure there is no environmental degradation, personal harm or unsafe operations and conditions, damage to historical or archaeological sites, or interference with other uses; to analyze and evaluate preliminary or planned drilling activities; to monitor progress and activities in the OCS; to acquire G&G data and information collected under a Federal permit offshore; and to determine eligibility for reimbursement from the government for certain costs. BOEM uses information collected to understand the G&G characteristics of oil- and gas-bearing physiographic regions of the OCS. The information aids the Secretary in obtaining a proper balance among the potentials for environmental damage, the discovery of oil and gas, and associated impacts on affected coastal States. Information from permittees is necessary to determine the propriety of the data and amount of reimbursement.

Form BOEM-0327 is submitted under this subpart to determine if permittees have the necessary qualifications pertinent to G&G exploration or scientific research.

**BOEM-0327—Requirements for Geological and Geophysical Explorations or Scientific Research on the Outer Continental Shelf** – Application for Permit to Conduct Geological or Geophysical Exploration for Mineral Resources or Scientific Research on the Outer Continental Shelf (Form Attachment 1) – Nonexclusive Use Agreement for Scientific Research (Form Attachment 2).

This form consists of the requirements for G&G activities requiring Permits and Notices along with the application that the respondent submits to BOEM for approval, as well as a nonexclusive use agreement for scientific research, if applicable. The requirements portion of the form lets the respondents know the authority, requirements, along with other relevant information for the permit.

Attachment 1 of the form, Application for Permit to Conduct Geological or Geophysical Exploration for Mineral Resources or Scientific Research on the Outer Continental Shelf, requires the respondent to fill in pertinent information relating to the company and the type of activity that will be conducted, along with all relevant information.

Attachment 2 of the form, Nonexclusive Use Agreement for Scientific Research on the Outer Continental Shelf, consists of information pertaining to which data and information resulted from the proposed activity will be made available to the public for inspection; applicant agreement that information obtained will not be sold or withheld for exclusive use; and applicant signs and submits to BOEM for approval.

Upon BOEM approval of the application, respondents are issued a permit using form BOEM-0328 for conducting geophysical exploration for mineral resources or scientific research or BOEM-0329 for conducting geological exploration for mineral resources or scientific research.

In this renewal, BOEM is updating form BOEM-0327 to clarify the types of copies being requested, delete incorrect language, make recommendations for faster processing, update addresses, and reference NEPA mitigation requirements. To respond to the types of questions BOEM receives from permittees on the form, BOEM is also clarifying wording, providing examples/tables to reduce confusion, and clarifying Regional differences when necessary to further assist permittees. BOEM is not asking for more information, just outlining current requirements in more detail.

These improvements do not change the hour burden for the form; however, based on public comments and respondent outreach, BOEM is making significant changes to the estimated hour burdens associated with the application. For the majority of permit applications, which are associated with G&G exploration in the Gulf of Mexico OCS Region, BOEM is increasing the hour burden from 3 to 300 hours. For applications in the frontier areas of the Alaska OCS Region and Atlantic OCS, BOEM is adjusting the burden to be significantly higher (from 300 to 1,000 hours), not because of the form changes, but because of the requirements to submit environmental information sufficient for the National Environmental Policy Act (NEPA) review about the effects of sound on marine mammals and other protected species. BOEM expects it will take more time for companies to compile and submit the necessary information to obtain the required authorizations to acquire a BOEM permit in these frontier areas, as well as to coordinate with other agencies. Due diligence, however, is still expected as full environmental review is authoritative within all OCS Regions.

BOEM believes the increased burden hours in this renewal accommodate the various requirements for all OCS Regions that companies must meet for environmental compliance to obtain G&G data, such as obtaining BOEM permits, coordinating their activities with the Department of Defense (DOD) and the National Aeronautics and Space Administration (NASA), as well as the additional requirement from the National Marine Fisheries Service (NMFS) to obtain an Incidental Take Authorization under the MMPA. To complement the changes made in form BOEM-0327, BOEM is separating the requirements in the BOEM-issued permits (BOEM-0328 and 0329) by OCS Region to further assist permittees and clarify Regional differences. The actual permits are filled in by BOEM and do not incur a respondent hour burden.

***3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.***

Currently 85% of all information is submitted electronically in all Regions. All reporting during operations is done electronically. Regions receive electronic versions of the forms and all other information, such as plan of operations and the environmental compliance information, required for the

application. They also receive the required signed hard copies. The electronic version of the non-proprietary information facilitates sharing with the staff doing the NEPA review. It also saves the Regions time as the information is posted on the website very quickly.

**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.**

There is no duplication. The DOI is the agency with specific statutory authority. Respondents are applying for individual permits, and each notice for processing of G&G data is unique, as are requests for reimbursement. There is no similar information available. To the extent that identical information or data were available from prior permits or other sources, BOEM would not require respondents to resubmit such information or data.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

This regulation could involve small businesses or other small entities if they desire to perform G&G exploration offshore. However, the majority of entities conducting offshore activities are not considered small because of the technical and financial resources needed to carry out such activities. BOEM needs the delineated information to evaluate all applications and notices, regardless of the size of the respondent. The OCS Lands Act and these implementing regulations (§ 551.13) require us to reimburse respondents for their costs of reproduction and processing of data and information that BOEM requests. We also pay respondents if they request reimbursement for food, quarters, or transportation they provide BOEM representatives (§ 551.8(a)) 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.**

Except for status reports, the information is on occasion or as specified in the permits. Therefore, less frequent reporting would not be possible. The frequency of status reports varies according to the permit specifications. The reports are necessary for resource evaluation and environmental oversight of any survey consequences. If BOEM did not collect the information, the Secretary could not meet the obligations of the OCS Lands Act in a timely manner, possibly resulting in economic losses to the Federal Government.

**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;**

Not applicable in this collection.

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

Section 551.14(c) and the permit form state that BOEM will provide a notice of intent to disclose data or information to an independent contractor or agent or to an adjacent State. The notice will afford the permittee a period of not less than 5 working days in which to submit comments on the intended action. Industry is aware, through the regulations and the permits, that BOEM may have a contractor reproduce, process, etc., data for a sale evaluation. BOEM may only have 90 days in which to conduct the entire

sale. Therefore, if there were any special circumstances, the permittee would need to notify BOEM immediately, which would allow for a longer response time if feasible.

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

Respondents must submit two original and two copies of form BOEM-0327. After BOEM approval, one signed original each is needed for the OCS region and the permittee (standard legal agreement); the copies are for the permittee's contractor and the public. The copy for the public, however, will not include some information in item D that is determined to be proprietary data and not subject to release.

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

The permit forms specify that at any time within 10 years after receiving notification of the completion of the acquisition activities conducted under the permit, BOEM may request that the permittee submit for inspection and possible retention all or part of the G&G data and/or information. As a normal business practice, respondents will generally retain acquired G&G data and/or information for a very long time, beyond even the 10-year requirement in the permit forms. This is not an unreasonable retention period for valuable resources data and/or information that BOEM may need at a future date if it conducts a strategic sale or requires data to conduct a national or regional resource assessment.

***(e) in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;***

Not applicable in this collection.

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

Not applicable in this collection.

***(g) that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or***

This collection does not include a pledge of confidentiality not supported by statute or regulation.

***(h) requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.***

This collection does not require proprietary, trade secret, or other confidential information not protected by agency procedures.

***8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past 3 years and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.***

***Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.***

***Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.***

As required in 5 CFR 1320.8(d), BOEM provided a 60-day notice in the *Federal Register* on August 22, 2014 (79 FR 49807). We received 2 sets of comments; the comments and BOEM’s response are summarized below.

During the comment period, BOEM requested input from several respondents on the availability of data, frequency of collection, clarity of instructions, and elements being collected. The burden estimates in Section A.12 reflect their input. The following respondents who provided estimates are:

Pauline Ruddy, BP Exploration (Alaska) Land Use Permitting & Compliance Advisor  
(907) 564-5328, 900 East Benson Boulevard, Anchorage, AK 99519-6612  
Pauline.Ruddy@bp.com

Peter Seidel, TGS NOPEC Geophysical Company, Project Manager,  
(713) 202-3580, City West Boulevard, Suite #200, Houston, TX 77042

Paul Bourgeois, Fairfield Industries, Permit and Data Acquisition Division,  
(281) 275-7550, 1111 Gillingham Lane, Sugar Land, TX 77478

Lyndon Findley, Western-Geco USA (Alaska), Manager,  
(713) 689-6816, 10001 Richmond Avenue, Houston, TX 77252

Jack Butcher, CGGVeritas, Project Supervisor,  
(832) 351-8428, 10300 Town Park Drive, Houston, TX 77072

W. Kerry Behrens, Fugro Geoservices, Inc., Senior Geosciences Manager,  
(337) 237-2636, 200 Dulles Drive, Lafayette, LA 70506

## **Discussion of Public Comments Received**

### **(1) International Assoc. of Geophysical Contractors (IAGC) with American Petroleum Institute (API)**

The IAGC and API jointly submitted one set of comments. BOEM has addressed each point separately below.

**Comment:** Section D 3 – Sound propagation information for Gulf of Mexico (GOM) Simsource Surveys is unwarranted.

**Response:** BOEM has given this comment due consideration and decided not to remove GOM simsource survey submissions at this time. Simsource surveys are new to the GOM and have not been considered previously in a GOM PEIS. As such, in the near term, BOEM will scrutinize these surveys in more detail than surveys that use serial or sequential methods of energizing source arrays. After a suitable period of time, this review may not be needed.

**Comment:** Burden Estimates from BOEM are flawed. BOEM should recognize the substantial hour burden associated with permit application preparation. Expert consultants have detailed 300 to 1,000 hours for preparation of an application for G&G activity permits and marine mammal take permits.

**Response:** In response to the comment and to respondent feedback, BOEM is increasing the hour burden to fill out the permit application form for the Gulf of Mexico OCS Region from 3 to 300 hours and for the other OCS areas from 300 to 1,000 hours. Companies conducting G&G activities in the Gulf of Mexico OCS Region have experience in compiling and submitting the necessary information to obtain the required authorizations. However, in the frontier areas outside of the Gulf of Mexico OCS Region, BOEM expects it will take more time for companies to compile and submit the necessary information to obtain the required authorizations to acquire a BOEM permit in these areas as well as coordinate with other agencies. Therefore, the burden for applicants in the other OCS Regions to describe the environmental effects and proposed mitigations is estimated much higher.

**Comment:** Section D. Proprietary Information Attachment Required for an Application for Geophysical Permit – Item 10 is requiring the applicant to list “all proposed initial and final processed data sets that will result from acquisition under this activity.” An applicant can identify to BOEM what the original final processed data will be, but will be unable to provide other Forms of the processed data that the market may demand at the time the applicant submits BOEM Form 0327.

**Response:** After review, BOEM will continue this requirement. The burden is considered minimal as BOEM only expects the permittee to conjecture what processing/end products are known at the time the permit application is submitted. This information often provides BOEM with a starting place for determining what type of products to expect from a survey. Inaccuracies or later changes are not penalized.

**Comment:** Section A. General Information – Item 4 requests an applicant provide a “Commencement Date” for the proposed geophysical activity. It is difficult for an applicant to provide a specific date because it is highly dependent on when the permit is used and when the vessel(s) and crew can be mobilized into the area of proposed activity.

**Response:** The “expected” commencement and “expected” completion date requirements will remain in the application as they provide BOEM with an idea of how long the permittee expects the duration of the activity to be. The planned time frame for the activity is especially critical in Alaska for NEPA review. These dates are critical for determining the possible environmental effects of the activity for such issues as the timing of subsistence hunting and presence of different protected species. The effective date of a permit will still be the issuance date that starts the 12-month clock ticking. For Atlantic OCS permits BOEM plans to coordinate the effective date of the permit with the effective date of the Incidental Harassment Authorization to the extent practicable. The goal is to provide the permittee with as close to the maximum 12 months of operating time as possible.

**Comment:** Section A. General Information – Item 6 requests the applicant provide the vessel(s) name, registry number and registered owner(s). It can be difficult for an applicant to provide this information. This requirement does not accommodate the global nature of the geophysical industry nor the unpredictable timeline and regulatory uncertainty attendant with the requirements of the MMPA, NEPA and ESA. Geophysical contractors utilize vessels that are in high demand and that operate globally. It is difficult for an applicant to identify (with complete certainty) a specific vessel that will be available and will be used for a survey to be conducted several months to over a year later. Furthermore, the United States Coast Guard (USCG) is provided the same information at the time the vessel(s) mobilize into the U.S. OCS. Consequently, the information request in BOEM Form 0327 is unnecessary. In the alternative, the Associations recommend that BOEM Form 0327 require an applicant to submit the type

of vessel(s) to be utilized in the survey (e.g. vessel classification, streamer versus OBN, number of streamers, etc.) and at the time the geophysical contractor notifies the USCG, the BOEM will also be notified of vessel(s) name, registry number(s) and registered owner(s).

**Response:** Homeland Security, as well as the Department of Defense, has contacted BOEM in the past concerning survey vessels. Therefore, this requirement needs to be retained. However, BOEM agrees that the information for this requirement may or may not be known at the time the permit application is submitted. Currently, if the applicants know this information they can provide it with the application. If they do not, BOEM allows them to provide it at a later date *prior* to operations beginning. In these cases, email is often used to provide the information to BOEM in a timely manner. In a few instances, the permittee did not know which vessels were going to be used when the permit was issued. In these instances the permit cover letter stated that operations could not commence until the vessel information was provided to BOEM, usually by email for quick turnaround time. BOEM understands that this is of particular concern for Atlantic permits. The GOM flexibility will be extended to the Atlantic permits as well. The Alaska Region requires vessel information for the NEPA analysis. Companies are directed to provide vessel specs that represent the most likely type of vessels that will be used for the activity. The final vessel information must be submitted ideally before the permit is issued, but definitely prior to commencement of operations pending approval from the NEPA staff.

(2) North American Submarine Cable Assoc. (NASCA)

**Comment:** NASCA urges BOEM to modify form BOEM-0327 to require permit applicants to identify and coordinate with submarine cables in the vicinity of any planned G&G activities.

**Response:** BOEM believes that “other uses” currently on the form would include submarine cable companies and that the current coordination processes with regards to submarine cables are working well in mature areas such as the Gulf of Mexico and should work just as well in the other Regions. In recognition of the concerns expressed in the NASCA comments, we have acknowledged such other uses by adding the words “including submarine cables” in form BOEM-0327 (under General Requirements paragraph E). Furthermore, we will add “Submarine Cable Coordination” to the list of Stipulations we attach to every permit. The NASCA would need to provide points of contact, etc., for the permittee. The matter would then be dealt with between the permittee and the submarine cable company.

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

The OCS Lands Act mandates that we reimburse respondents for their reproduction and processing costs of certain data and information that BOEM requests. These implementing regulations and permit forms comply with the OCS Lands Act and provide for reimbursement payment of the G&G data and information when applicable. BOEM also pays respondents if they request reimbursement for food, quarters, or transportation they provide BOEM representatives during inspections. 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 protect proprietary information according to the Freedom of Information Act (5 U.S.C. 552) and its implementing regulations (43 CFR part 2), and under regulations at 30 CFR 551.

**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 permittees or notice filers. It should be noted that not all of the potential respondents will submit information in any given year and some may submit multiple times. The burden estimates include the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Submissions are generally on occasion, annually, or vary by section or permit. We estimate the total annual burden is 40,954 hours. Refer to the following table for a breakdown of the burdens.

**Burden Table**

| Citation<br>30 CFR 551                                | Reporting and Recordkeeping Requirement  | Hour Burden   | Average No. of Annual Responses       | Annual Burden Hours |
|---|--|---|---------------------------------------|---------------------|
|   |  | Non-Hour Cost Burden*   |                                       |                     |
| <b>30 CFR 551.1 through 551.6</b>                     |  |   |                                       |                     |
| 551.4(a), (b);<br>551.5(a), (b), (d);<br>551.6; 551.7 | Apply for permits (form BOEM-0327) to conduct G&G exploration, including deep stratigraphic tests/revisions when necessary and mitigations. Submit required information in manner specified. | 1,000<br>AK**   | 4 Applications                        | 4,000               |
|   |  | 1,000<br>ATL**  | 9 Applications                        | 9,000               |
|   |  | 300 GOM   | 74<br>Applications                    | 22,200              |
|   |  | 87 applications X \$2,012 = \$175,044                         |                                       |                     |
| 551.4(b);<br>551.5(c), (d);<br>551.6                  | File notices to conduct scientific research activities, including notice to BOEM prior to beginning and after concluding activities.   | 1   | 1 Notice                              | 1                   |
| 551.6(b) 551.7(b)<br>(5)                              | Notify BOEM if specific actions should occur; report archaeological resources (no instances reported since 1982). Consult with other users.  | 1   | 1 Notice                              | 1                   |
| <b>Subtotal</b>                                       |  |   | <b>89 responses</b>                   | <b>35,202 hours</b> |
|   |  |   | <b>\$175,044 non-hour cost burden</b> |                     |
| <b>30 CFR 551.7 through 551.9</b>                     |  |   |                                       |                     |
| 551.7; 551.8  | Submit APD and Supplemental APD to BSEE.   | Burden included under BSEE regulations at 30 CFR 250, Subpart |                                       | 0                   |

| Citation<br>30 CFR 551                               | Reporting and Recordkeeping<br>Requirement  | Hour<br>Burden                                     | Average No.<br>of Annual<br>Responses | Annual<br>Burden<br>Hours |
|--|---|--|---------------------------------------|---------------------------|
|  |   | Non-Hour Cost Burden*                              |                                       |                           |
|  |   | D (1014-0018).                                     |                                       |                           |
| 551.7; 551.8(b)                                      | Submit information on test drilling activities under a permit, including required information and plan revisions (e.g., drilling plan and environmental report).  | 1  | 1 Submission                          | 1                         |
| 551.7(c)   | Enter into agreement for group participation in test drilling, including publishing summary statement; provide BOEM copy of notice/list of participants (no agreements submitted since 1989).   | 1  | 1 Agreement                           | 1                         |
| 551.7(d)   | Submit bond(s) on deep stratigraphic test and required securities   | Burden included under 30 CFR Part 556 (1010-0006). |                                       | 0                         |
| 551.8(a)   | Request reimbursement for certain costs associated with BOEM inspections (no requests in many years).   | 1  | 1 Request                             | 1                         |
| 551.8(b), (c)  | Submit modifications to, and status/final reports on, activities conducted under a permit.  | 38 AK**  | 4 Respondents x 10 Reports = 40       | 1,520                     |
|  |   | 38 ATL**   | 9 Respondents x 10 Reports = 90       | 3,420                     |
|  |   | 2 GOM  | 55 Respondents x 3 Reports = 165      | 330                       |
| 551.9(c)   | Notify BOEM to relinquish a permit.   | 1/2  | 2 Notices                             | 1                         |
| <b>Subtotal</b>                                      |   |  | <b>300 responses</b>                  | <b>5,274 hours</b>        |
| <b>30 CFR 551.10 through 551.13</b>                  |   |  |                                       |                           |
| 551.10(c)  | File appeals.   | Exempt under 5 CFR 1320.4(a)(2), (c).              |                                       | 0                         |
| 551.11; 551.12                                       | Notify BOEM and submit G&G data and/or information collected and/or processed by permittees, bidders, or 3 <sup>rd</sup> parties, etc., including reports, logs or charts, results, analyses, descriptions, information as required, and agreements, in manner specified. | 4  | 40 Submissions                        | 160                       |
| 551.13   | Request reimbursement for certain costs associated with reproducing data/information.   | 2  | 40 Submissions                        | 80                        |
| <b>Subtotal</b>                                      |   |  | <b>80 responses</b>                   | <b>240 hours</b>          |
| <b>30 CFR 551.14</b>                                 |   |  |                                       |                           |
| 551.14(a), (b)                                       | Submit comments on BOEM intent to disclose data and/or information to the public.   | 1  | 2 Comments                            | 2                         |
| 551.14(c)(2)   | Submit comments on BOEM intent to disclose data and/or information to an independent contractor /agent.   | 1  | 2 Comments                            | 2                         |
| 551.14(c)(4)   | Contractor/agent submits written commitment not to sell, trade, license, or disclose data and/or information without BOEM consent.  | 1  | 2 Commitments                         | 2                         |
| 551.1 - 551.14                                       | General departure and alternative compliance requests not specifically covered elsewhere in part 551 regulations.   | 1  | 2 Requests                            | 2                         |
| <b>Subtotal</b>                                      |   |  | <b>8 responses</b>                    | <b>8 hours</b>            |
| <b>Extension for Permit Form &amp; Recordkeeping</b> |   |  |                                       |                           |
| 551.14(b) (BOEM-0327)                                | Request extension of permit time period; enter agreements.  | 1  | 100 Extensions                        | 100                       |
|  | Retain G&G data/information for 10 years and make available to BOEM upon request.   | 1  | 130 Recordkeepers                     | 130                       |
| <b>Subtotal</b>                                      |   |  | <b>230 responses</b>                  | <b>230</b>                |

| Citation<br>30 CFR 551 | Reporting and Recordkeeping<br>Requirement | Hour<br>Burden        | Average No.<br>of Annual<br>Responses | Annual<br>Burden<br>Hours |
|------------------------|--|-----------------------|---------------------------------------|---------------------------|
|                        |  | Non-Hour Cost Burden* |                                       |                           |
|                        |  |                       |                                       | hours                     |
| <b>Total Burden</b>    |  |                       | 707 Responses                         | 40,954<br>Hours           |
|                        |  |                       | \$175,044 Non-Hour Cost<br>Burden     |                           |

\*Fees are subject to modification per inflation annually.

\*\* Burden hours for the frontier areas of the Alaska Region and Atlantic OCS are significantly higher because of NEPA and mitigation requirements. BOEM is accounting for the total time to compile/submit the necessary information to obtain the required authorizations to acquire a BOEM permit. There are currently no such activities ongoing in the Pacific OCS Region.

***(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 the Federal Government.”***

The average respondent cost is \$45/hour (rounded). This cost is broken out in the below table using the Bureau of Labor Statistics data for the Houston, TX area\*. See BLS website:

<http://www.bls.gov/bls/wages.htm>.

| Position                              | Level          | Hourly Pay<br>rate (\$/hour<br>estimate) | Hourly rate<br>including benefits<br>(1.4** x \$/hour) | Percent of time<br>spent on<br>collection | Weighted<br>Average<br>(\$/hour) |
|---------------------------------------|----------------|--|--|---|----------------------------------|
| Secretary/Administrative              | 6              | \$21                                     | \$29   | 65%                                       | \$19                             |
| Cartographer/Permitting<br>Specialist | ***            | \$53                                     | \$74   | 10%                                       | \$7                              |
| Regulatory Geoscientist               | All<br>Workers | \$53                                     | \$74   | 20%                                       | \$15                             |
| Staff Level Geoscientist              | All<br>Workers | \$53                                     | \$74   | 5%  | \$4                              |
| <b>Weighted Average (\$/hour)</b>     |                |  |  |   | <b>\$45</b>                      |

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

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

\*\*\* Job title not found in BLS; rate based on industry outreach.

Based on a cost factor of \$45 per hour, we estimate the hour burden as a dollar cost equivalent is \$1,842,930 (\$45 x 40,954 hours = \$1,842,930).

***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 in Item 12.***

***(a) The cost estimate should be split into two components: (1) a total capital and start-up cost component (annualized over its expected useful life) and (2) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including***

system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

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

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

We have identified one non-hour cost burden for this collection of information. Under § 551.5(a) there is an application fee of \$2,012 when respondents submit a permit application. Refer to the table in Section A.12.

**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 cost to the Federal Government is \$60/hour (rounded). This cost is broken out in the below table using the Office of Personnel Management pay schedule for the REST OF UNITED STATES (Consisting of the portions of the lower 48 United States not located within another locality pay area).

| Position                          | Grade   | Hourly Pay rate (\$/hour estimate) | Hourly rate including benefits (1.5* x \$/hour) | Percent of time spent on collection | Weighted Average (\$/hour) |
|-----------------------------------|---------|------------------------------------|---|-------------------------------------|----------------------------|
| Technician                        | GS-8/5  | \$24                               | \$36  | 30%                                 | \$11                       |
| Geologist                         | GS-13/5 | \$45                               | \$68  | 64%                                 | \$44                       |
| Supv. Geophysicist/Geologist      | GS-14/5 | \$53                               | \$80  | 5%                                  | \$4                        |
| Regional Geol. Supv.              | GS-15/5 | \$62                               | \$93  | 1%                                  | \$1                        |
| <b>Weighted Average (\$/hour)</b> |         |                                    |   |                                     | <b>\$60</b>                |

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

We estimate that to analyze and review the information, BOEM will spend approximately 1,435 hours annually. Based on a cost factor of \$60 per hour, we estimate the total annual burden on the Federal Government is \$86,100 (\$60 x 1,435 hours = \$86,100). The annual hours are based on the following:

|                       |                             |           |
|-----------------------|-----------------------------|-----------|
| § 551.4, 551.5, 551.6 | 87 applications x 6 hours = | 522 hours |
| § 551.8               | 295 reports x 2 hours =     | 590 hours |
| § 551.9               | 2 responses x 1/2 hour =    | 1 hours   |
| §§ 551.11, 551.12     | 40 responses x 1 hours =    | 40hours   |

|                       |                          |                  |
|-----------------------|--------------------------|------------------|
| § 551.13              | 40 responses x 2 hours = | 80 hours         |
| Miscellaneous Reviews | 202 hours =              | <u>202</u> hours |

1,435 hours

Permittees are reimbursed also for the reasonable cost of processing geophysical information required to be submitted when processing is in a form or manner required by the Director of BOEM and is not used in the normal conduct of the business of the permittee.

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

**Burden Hours:** The currently approved annual hour burden is 1,033 hours. This submission requests 40,954 hours. We made a program increase of 12,420 hours to allow for estimated G&G activity and permit applications for the Atlantic OCS (§§ 551.4-551.8), as a result of the BOEM Record of Decision identified in Item No.1. We also made a program increase of 1 hour to account for the BOEM regulatory portion of a requirement regarding test drilling under a permit (§§ 551.7, 551.8). This hour burden was originally covered under a joint Bureau of Ocean Energy Management, Regulation, and Enforcement information collection that is now under the Bureau of Safety and Environmental Enforcement; therefore, BOEM is now covering the estimated burden. In addition, there is an adjustment increase of 27,500 hours due to re-estimating the number of annual responses and the amount of time required to respond, based on respondent consultations and public comment, primarily for permit applications.

In response to public comments received (see Item No. 8), BOEM has increased the burden estimate for permit applications from 3 to 300 hours in the Gulf OCS Region and from 300 to 1,000 hours in the other OCS Regions. This change multiplied by the increased number of applications accounts for a significant increase in burden hours for this collection. Although the work required for industry to comply with MMPA, NEPA, and ESA requirements does not stem directly from BOEM’s permit forms, industry has asked us to recognize the significant time constraints involved before they are able to apply for a BOEM permit. BOEM is therefore doing such in this renewal request.

**Non-Hour Costs:** The currently approved annual reporting and recordkeeping non-hour cost burden is \$148,888. This submission requests \$175,044. We made a program increase of \$18,108 for the permit application fees estimated for the Atlantic OCS as a result of the BOEM Record of Decision. We also made an adjustment increase of \$8,048 due to the increase in the estimated number of annual permit applications submitted, primarily for the Alaska OCS.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

BOEM will not tabulate or publish the data.

***17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.***

BOEM will display the OMB control number and approved expiration date.

***18. Explain each exception to the topics of the certification statement identified in, “Certification for Paperwork Reduction Act Submissions”.***

To the extent that the topics apply to this collection of information, we are not making any exceptions to the Certification for Paperwork Reduction Act Submissions.