Findings and Recommendations from Response Burden Testing for the EIA-23L

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November 12, 2015

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Research Objectives

The Office of Oil, Gas, and Coal Supply Statistics (OGCSS) seeks to improve the accuracy of the response burden figure on the EIA-23L survey form and explore the potential change in response burden due to new reporting requirements for respondents. The EIA-23L, "The Annual Survey of Domestic Oil and Gas Reserves" collects data on proved reserves and production of crude oil, natural gas, lease condensate, and other related products.

Specific objective of the interviews on Form EIA-23L were:

- Collect information on the response burden associated with the current version of the survey form.
- Explore proposed changes to the survey form and the impact on response burden these changes would have.

Research Methodology

SDT conducted nine exploratory interviews with current EIA-23L respondents from October 25-30, 2015. Companies that participated in the interviews were selected based on size of their operation. Three companies were selected from three categories: large size companies defined as annual production greater than 1.5 million barrels of crude oil, or 15 billion cubic feet of natural gas; medium size companies defined as annual production between 400 thousand barrels of oil, or 2 billion cubic feet of natural gas, and 1.5 million barrels of crude oil, or 15 billion cubic feet of natural gas; and small size companies defined as annual production less than 400 thousand barrels of crude oil ,or 2 billion cubic feet of natural gas. The interviews lasted approximately 30 minutes. Appendix A contains the protocol used to conduct the interviews.

Executive Summary

Overall the interviews conducted revealed a significant response burden associated with the EIA-23L survey. The answers we received regarding the response burden varied significantly. This finding was consistent between all three size groupings of companies. The interviews revealed that much of the response burden can be attributed to the Reserve Information Gathering System (RIGS) online tool used by respondents to fill out the survey. Respondents also revealed that asking them to report data at the county level, instead of field level, would decrease the response burden associated with the EIA-23L survey.

Question Specific Findings:

Part B Background Information

FINDINGS LARGE COMPANIES

The length of time that the larger companies have been in operation ranged from 16 years to over 50 years. Although their job titles differed, the respondents for these large companies had similar job responsibilities. The respondents' responsibilities included coordinating and gathering data for government reports and corporate analysis. All of the respondents within this group have filled out the EIA-23L survey previously.

FINDINGS MEDIUM COMPANIES

The length of time that the medium companies have been in operation ranged from 15 years to over 60 years. Similar to the large companies interviewed, the job titles of the respondents for the medium sized companies varied, however their primary job responsibilities were centered on the reporting of government forms and the managing of data regarding oil and gas reserves. Most (2) of the medium sized company respondents have been filling out the EIA-23L survey for 8 years. One respondent from this group reported that they have filled out the survey for over 30+ years.

FINDINGS SMALL COMPANIES

The length of time that the small companies have been in operation ranged from 7 years to 34 years. Similar to the medium and large sized companies interviewed, the respondents' titles for the small establishments differed, but the job responsibilities were comparable. The responsibilities of the respondents for small companies were centered on data gathering and reporting. The respondents also had varying lengths of experience in filling out the EIA-23L. The respondent with the most experience with the survey had been filling out for 13 years, while the respondent with the least experience had only filled out the survey once.

DISCUSSION

The companies that participated in these interviews varied by the size of their operation and by how long the company has been operating in the oil and gas business. The respondents interviewed also had differing job titles and differing levels of experience when filling out the EIA-23L survey. This assortment of companies and respondents provide a range of estimates regarding the reporting burden for filing Form EIA-23L.

Part B Response Burden Current Form

FINDINGS LARGE COMPANIES

Respondents' answers for the time it takes to gather the data necessary for the EIA-23L ranged from 10-

60 hours. The average for the responses was 39.3 hours.

Once the information was compiled, the respondents' stated that the amount of time it takes to fill-in

and file the EIA-23L survey form ranged from 2-112 hours. The average for these responses was 44.7

hours.

Total reporting burden for large size companies ranged from 12-160 hours with an average reporting

burden of 84 hours.

All of the respondents reported that they completed the survey form without the assistance of others.

Two of the three respondents reported that they filled out the survey using a software program.

Another commented about how tedious it was to find the well location using the RIGS online

application.

FINDINGS MEDIUM COMPANIES

Respondents reported that the amount of time it takes them to gather the data in order to report on the

EIA-23L survey ranged from 3-80 hours. The average for the responses was 34 hours.

Once the information was compiled, the Respondents' stated that the amount of time it takes to fill-in

and file the EIA-23L survey form ranged from 1-117 hours. The average for the responses was 66 hours.

Total reporting burden for medium size companies ranged from 20-160 hours with an average reporting burden of 100 hours.

One of the three respondents stated that selecting the fields using the RIGS online tool takes time and

changing data is difficult. He described the RIGS application as "archaic."

FINDINGS SMALL COMPANIES

The answers for the amount of time it takes respondents to gather the data necessary to report on the

EIA-23L ranged from 3-40 hours. The average for these responses was 16.7 hours.

The answers for the amount of time it takes small companies to fill-in and file the EIA-23L survey ranged

from 1-120 hours. The average for these responses was 40.7 hours.

Total reporting burden for small size companies ranged from 4-160 hours with an average reporting burden of 57.3 hours

DISCUSSION

The reported current response burden for companies filling out the EIA-23L form varied significantly. The wide range of responses pertaining to the amount of hours required to complete the survey was not related to the size of the company interviewed, nor was it connected to the respondents' experience with the survey. This finding was also present when respondents were asked to estimate the amount of time it takes to collect data for the EIA-23L survey.

Two of the respondents interviewed reported that the online tool was a reason why the survey required a significant amount of time to fill out. One of these respondents reported difficulty selecting specific wells using the RIGS online tool.

Another one of the respondents interviewed informed us that there was a three year lag before EIA had updated field name information in the Field Code Master List. This respondent said that changing the incorrect field data was difficult and time consuming.

Respondents who reported a large response burden were both respondents who filled out the survey manually and respondents who used a program to fill out the RIGS online tool.

Part B Response Burden County Level Form

FINDINGS LARGE COMPANIES

Responses by respondents for how long they anticipate it will take to collect data at the county level EIA-23L survey form ranged from 10-24 hours. The average of these responses was 19.3 hours, a decrease of 50.8% compared to the current survey.

Respondents' answers for the amount of time they anticipate it will take to fill-in and file the county level EIA-23L survey form ranged from 1-96 hours. The average for these responses was 37.7 hours, a decrease of 15.7% compared to the current survey.

The anticipated total response burden for the county level survey for large companies ranged between 11-120 hours. The average of these responses was 57 hours, a decrease of 32.1% compared to the current survey.

None of the respondents reported that they will need to purchase new software or equipment to complete the new survey. Although, one of the three respondents did note that the program they used to fill out the form online will need to be modified.

All of the respondents interviewed thought that the change to county level collection would make the survey easier to fill out.

FINDINGS MEDIUM COMPANIES

Responses by respondents for how long they anticipate it will take to collect data for the county level EIA-23L survey form ranged from 3-80 hours. The average of these responses was 30.7 hours, a decrease of 9.8% compared to the current survey.

Respondents' answers for the amount of time they anticipate it will take to fill-in and file the county level EIA-23L survey form ranged from 1-117 hours. The average for these responses was 52.7 hours, a decrease of 20.2% compared to the current survey.

The anticipated total response burden for the county level survey for medium companies ranged between 10-120 hours. The average of these responses was 83.3 hours, a decrease of 16.7% compared to the current survey.

One of the three respondents for medium companies was not able to estimate how much time it would take to gather the data. This respondent thought that the move to county level would be more difficult because the system they used to track data was based on field level and not county level.

Two of the respondents interviewed thought that the change to county level collection would make the survey easier to fill out.

FINDINGS SMALL COMPANIES

One of the respondents for the small companies anticipates the new survey will require 3 hours to gather data for the count level EIA-23L survey. This was a decrease of 57.1% from their answer for the current survey. Additionally, this respondent did not anticipate a change in the amount of hours (1) it will take to fill-in and file the county level EIA-23L survey. The anticipated total response burden by this respondent for the county level EIA-23L survey was 4 hours, a decrease of 50% compared to their response for the current survey.

One of the other two respondents for small companies was not able to quantify the amount of time it would take to complete the new survey, or the amount of time it would take to gather data for the new survey. However, they stated that the amount of time required to complete a county level EIA-23L form would be "greatly reduced" compared to the field level form.

The other respondent, who was not able to quantify the amount of time it would take to complete the new survey, stated that initially the survey would be more difficult, but eventually it would be "ok."

Two of the three respondents interviewed thought that the change to county level collection would make the survey easier to fill out.

DISCUSSION

Seven of the nine of the respondents interviewed thought that collecting data at the county level would make the survey easier to fill out. These seven respondents also reported that the reporting level from field level to county level would reduce the time it takes to the complete the survey.

Regarding the gathering of data for the new report, five out of nine respondents anticipated the new survey would require less time to gather the data. Two respondents estimated the time it takes to collect the data would remain the same. Two respondents indicated it would increase their reporting burden.

Of the two respondents who stated the change to county level would make the survey more difficult, one stated their current data is collected at the field level and to report county level data would make reporting more difficult. The other of the two respondents reported that the move to reporting data at the county level would make the reporting more difficult initially, but said it would be fine eventually. This respondent did not elaborate why it would be more difficult initially. It should be noted that this respondent had the least amount of experience with the EIA-23L and only filled it out once before.

Although none of the respondents reported that they would need to purchase new software or equipment to complete the new survey. One of the respondents who use automated programs to fill out the survey noted that the program used would have to be modified.

A majority of respondents believe the move to county level will make the survey easier and will take less time to do. Those who did not think the move would make it easier were either inexperienced in filling out the survey or they had a data base system based on field level data collection that may be difficult to modify to aggregate the data at county level.

Part C WRAP UP

FINDINGS LARGE COMPANIES

Most (2) of the respondents for the large companies filled out other EIA forms. Similarly, most (2) also commented on the difficulty of the online tool used to fill out the form. One described the RIGS online application as "archaic" and the other described it as "tedious" to use. However, one respondent did describe the survey as "straight forward."

One of the respondents suggested the idea of allowing respondents to access last year's data. Another respondent commented that their automated program for filling out the survey no longer worked, but could not determine if that was an issue on their end or for EIA.

FINDINGS MEDIUM COMPANIES

Only one of the three respondents for medium sized companies filled out other EIA survey forms. When asked to describe the EIA-23L, one said "it was not a terrible form" and compared it to filling out tax forms. Another respondent stated the survey was cumbersome and cited the RIGS online tool as difficult to use and time consuming.

One of three medium company respondents had a suggestion for improving the survey. This respondent stated the RIGS application had programming issues and elaborated that while filling out the survey there were times when the information entered would be deleted by the program. The other two respondents did not have any suggestions, but one respondent did say that changing the reporting level from field level move to county level was "a step in the right direction."

FINDINGS SMALL COMPANIES

When asked for what they think of the survey overall respondents' answers varied. One respondent described the survey as time consuming. Another respondent describe it as "Not the top priority, but not bad." The other respondent said they "did not hate" the EIA-23L survey.

When asked for suggestion on how we can improve the survey, one respondent suggested that EIA pull information from state databases. Another respondent suggested EIA provide respondents with their previously submitted survey forms. The other respondent did not have any suggestions, but did say the county level change was a great start to improving the survey.

DISCUSSION

Interviews with respondents revealed similar feelings regarding the EIA-23L survey. The common sentiment amongst respondents is that the survey is too time consuming. Respondents also mentioned that the RIGS online tool is difficult to use and a reason why the survey takes a significant amount of time to complete. When asked how EIA could improve the survey, most of the respondents did not have any suggestions, but stated that the change to county level data collection was an improvement.

Appendix A

EIA-23L: Annual Survey of Domestic Oil and Gas Reserves (Field Version)

Response Burden Testing Protocol

October 2015

(This protocol is a guide – the questions presented here won't necessarily be asked exactly as worded in the protocol or in this order. It is important to note that not all questions will be asked in every interview.)

Research Goals:

- To understand the amount of time is takes a respondent to fill out the EIA-23L survey;
- To understand how respondents are calculating their response burden;
- And, to understand what factors contribute to a respondent's response burden.

Part A - Introduction

• Introduce observers and their background

Purpose of visit:

Let me start by telling you a little about what we will be doing today:

- We are asking you some questions about your reporting habits for EIA-23L survey.
- We are attempting to clear up some response burden issues we have with the EIA-23L form, specifically how long it takes for a respondent to fill out the survey form.
- Ultimately, we are interested in how long it takes you to fill out the survey form and what elements of the survey take longer to fill out than others.
- There are no right or wrong answers, and if something doesn't make sense to you or you have any questions, please ask.
- Before we get started, I'd like to audio record this interview so I don't have to later rely on my memory. This session is confidential, which means only persons directly related to this project can listen to your tapes, and the recordings are erased once our report is written. The report combines information from all of our interviews and contains no information that personally identifies you, the mine, or the company at which you work. Is it okay if I record this interview?
- Do you have any questions?

Part B - Background Information

Let's begin by talking about your establishment(s):

How long has your company been operating oil and gas wells?

What is your role at this company?

- What is your title?
- What are your responsibilities?
- Did you complete the 23L survey form last year?
- How many years have you been filling out the 23L?

Part B - EIA-23L Response Burden

As you may or may not have heard, EIA is going to make some changes to the 23L. One of the biggest changes we are looking to make is to no longer collect data at the field level, and instead collect data at the county level.

- Based on the current version of the form, how much time does it take for you to complete the EIA-23L?
- How much time do you spend collecting and reporting the 2014 information for the most recent EIA-23L survey?
- Do you access the data needed for the survey by yourself or do you have to work with others to gather data? If you received the data from others, how many other people do you need to coordinate with to compile the information to report on the form?
- Do you fill out the survey form manually or automatically? (Using a program)
- Now, if your company reported reserves at the county level instead of by field, how much time do you estimate it will take to gather and complete the EIA-23L reporting at a county level?
 - o *If needed,* would you say that it will increase or decrease the amount of time it takes to fill the form out, or would you say it will take the same amount of time?
- Do you consider the change in reporting requirements easier or more difficult?
- Do you have any start-up costs, such purchasing new software or equipment, to report your company's information at the county level instead of the field level?

Part C- Wrap up

- Do you complete any other survey reports for EIA?
- If so, how does completing the EIA-23L compare with any of the other EIA oil and gas surveys that you complete?

Do you have any suggestions on how we can make it easier for your company to report on this

survey form?

Appendix B

PART B RESPONSE BURDEN

CURRENT SURVEY	_		PROPOSED SURVEY					
LARGE COMPANIES	3		LARGE COMPANIES					
GATHER	COMPILE	TOTAL	GATHER	COMPILE	TOTAL			
10	2	12	10	1	11			
48	112	160	24	96	120			
60	20	80	24	16	40			
MEDIUM COMPANIES		MEDIUM COMPANIES						
GATHER	COMPILE	TOTAL	GATHER	COMPILE	TOTAL			
19	1	20	9	1	10			
80	80	160	80	40	120			
3	117	120	3	117	120			
•								
SMALL COMPANIES	MALL COMPANIES		SMALL COMPANIES					
GATHER	COMPILE	TOTAL	GATHER	COMPILE	TOTAL			
7	1	8	3	1	4			
40	120	160	"GREATLY REDUCED"	<120	<160			
3	1	4	"MORE DIFFICULT INITIALLY"	>1	>4			
*FIGURES ARE IN HOURS								

RESPONSE BURDEN FIELD LEVEL SURVEY

LARGE COMPANIES

- All of the respondents for large companies reported they completed the form without the assistance of others
- 1 of the 3 respondents for large companies reported filling out the survey manually
- 2 of the 3 respondents for large companies reported they used a program to fill out the survey

MEDIUM COMPANIES

• 2 of the 3 respondents for medium companies stated they completed the survey form with the assistance of others

2 of the 3 respondents for medium companies stated that they fill out the survey form manually

SMALL COMPANIES

- 2 of the 3 respondents for small companies stated they completed the survey form without the assistance of others
- 2 of the 3 respondents for small companies stated they fill out the survey form manually

ESTIMATED RESPONSE BURDEN COUNTY LEVEL SURVEY

LARGE COMPANIES

- None of the respondents for large companies stated they would need to purchase new software
 or equipment to fill out the new EIA-23L survey. However, one respondent noted having to
 modify the program used to fill out the survey automatically
- All of the respondents for large companies stated that the change to county level collection would make the survey easier to fill out

MEDIUM COMPANIES

- 2 of the 3 respondents for medium companies stated that the change to county level collection would make the survey easier to fill out
- 1 of the 3 respondents for medium companies stated that the change to county level collection would make the survey more difficult to fill out
 - This respondent stated their current data program is field level based and this is would cause issues. This respondent could not quantify the increase in time associate with the change.
- None of the respondents for medium companies reported that they would need to purchase new software or equipment to fill out the new EIA-23L survey

SMALL COMPANIES

- 2 of the 3 respondents for small companies stated that the change to county level collection would make the survey easier to fill out
- 1 of the 3 respondents for small companies stated that the change to county level would make the survey more difficult to fill out, but "eventually it will be ok"
- None of the respondents for small companies reported that they will need to purchase new software or equipment to complete the new survey

Part C WRAP UP

LARGE COMPANIES

- 2 of the 3 respondents for large companies commented on the RIGS online tool for the EIA-23L survey
 - 1 of the 2 respondents described the online tool as "archaic"

- 1 of the 2 respondents described the online tool as "tedious to use"
- 1 of the 3 respondents for large companies described the EIA-23L as "straight forward"
- 1 of the 3 respondents for large companies suggested adding last year's company data to the EIA-23L survey tool

MEDIUM COMPANIES

- 2 of the 3 respondents for medium companies commented on the RIGS online tool
 - 1 of the 2 respondents stated the online tool took a lot of time to use and changing data in the survey was difficult
 - o 1 of the 2 respondents stated the online tool has issues that need to be addressed
- 1 of the 3 respondents for medium companies commented that the EIA-23 survey was cumbersome
- 1 of the 3 respondents for medium companies commented that the EIA-23 survey was "not terrible" and compared it to filing taxes
- 1 of the 3 respondents for medium companies had suggestions for improving the EIA-23L survey. This respondent stated the RIGS online tool has programming issues that need to be addressed
- 2 of the 3 respondents for medium companies did not have suggestion for improving the EIA-23L survey, but 1 of these 2 respondents stated the move was "a step in the right direction"

SMALL COMPANIES

- 1 of the 3 respondents for small companies described the survey as "time consuming"
- 1 of the 3 respondents for small companies describe it as "Not the top priority, but not bad"
- 2 of the 3 respondents for small sized companies had suggestions for how to improve the EIA-23L survey
 - 2 of the 2 respondents suggested making the previously submitted survey available to the companies that submitted them
 - 1 of the 2 respondents suggested providing clearer definitions on the survey form
 - o 1 of the 2 respondents suggested populating the RIGS online tool with last year's data
 - o 1 of the 2 respondents suggested EIA pull information form state databases
- 1 of the 3 respondents for small companies did not have suggestions for how to improve the EIA-23L survey, but did state the move to county level data collection was a great start