

Supporting Statement A
30 CFR 250, Subpart G, Well Operations and Equipment
OMB Control Number 1014-0028
OMB Expiration Date: NEW

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, as amended (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 that 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.

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, the Bureau of Safety and Environmental Enforcement (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. Various applications and/or permits are subject to cost recovery, and BSEE regulations specify service fees for these requests.

In addition to the general rulemaking authority of OCSLA, 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 BSEE, 30 U.S.C. 1751 is included as additional authority for these requirements.

This ICR pertains to the paperwork burden included in this rulemaking. This would also establish in 30 CFR Part 250, a new subpart G, *Well Operations and Equipment*. This rule focuses on blowout preventer (BOP) requirements, including incorporation of industry standards and revising existing regulations. The rule would include reforms in the areas of well design, well control, casing, cementing, real-time well monitoring, and subsea containment. This rule affects Subpart A (1014-0022, expiration 8/31/2017); Subpart B (1014-0024, expiration 11/30/2018; Applications for Permits to Drill (1014-0025, expiration 4/30/17); Applications for Permits to Modify (1014-0026, expiration 5/31/17); Subpart D (1014-0018, expiration 10/31/17); Subpart E, (1014-0004, expiration 12/31/16); Subpart F, (1014-0001, expiration 12/31/16); Subpart P, (1014-0006, expiration 12/31/16); and Subpart Q, (1014-0010, expiration 10/31/16). Once this final rule becomes effective, the paperwork burdens associated with the various other subparts will be removed from this collection of information (Subpart G) and consolidated with the respective IC burdens under their OMB Control Numbers.

This rule also codifies NTL 2013-G01, Global Positioning Systems (GPS) for Mobile Offshore Drilling Units (MODUs) (1014-0013, expiration 11/30/2018 into Subpart G. Once this final rule becomes effective, the GPS for MODUs collection, 1014-0013, will be discontinued.

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.

BSEE uses the information to ensure safe drilling, workover, completion, and decommissioning operations and to protect the human, marine, and coastal environment. BSEE analyzes and evaluates these information/requirements to reduce the likelihood of a similar Deepwater Horizon event and to reduce the risk of fatalities, injuries, and spills. BSEE also utilizes these requirements in the approval, disapproval, or modification process for well operations.

Specifically, BSEE uses the information to ensure:

Subpart A – provides 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.

Subpart B – to analyze and evaluate the information and data collected to make an informed decision on whether to approve the proposed DWOPs, or whether modifications are necessary without the analysis and evaluation of the required information.

Subpart D – cement jobs are adequate for the well conditions; and industry can demonstrate well containment during drilling operations.

Application for Permit to Drill - the drilling unit is fit for the intended purpose; equipment is maintained in a state of readiness and meets safety standards; and each drilling crew is properly trained and able to promptly perform well control activities at any time during well operations.

Application for Permit to Modify - adequacy of the equipment, materials, and/or procedures that the lessee or operator plans to use during drilling/well plan modifications and changes in major equipment.

Subparts E and F – production packer setting depth would codify existing BSEE policy to ensure consistent permitting. It is expected that industry already complies with the design specifications.

Subpart G –

- certain well designs and operations have been reviewed by appropriate third parties/engineers/classification societies that, after one year, have been approved by BSEE;
- rig tracking data is available to locate rigs during major storms;
- casing or equipment repairs are acceptable and tested;
- up-to-date engineering documents are available;
- the BOP and associated components are fit for service for its intended use;
- that the BOP will function as intended;
- that BOP components are properly maintained and inspected;
- the proper engineering reviews and approvals for all BOP designs, repairs, and modifications are met.

This ICR includes seven forms. This rulemaking would add additional information to form BSEE-0144, *Rig Movement Notification Report*. The other six forms would remain unchanged.

Changes made to the Rig Movement Notification Report-BSEE-0144 are as follows:

The introductory paragraph has been revised to include lift boats and wire-line units;

General Information – added wire-line unit under Rig Type;

Rig Arrival Information – added two new items: Is Rig New to OCS? Y/N; and Location where rig came from;

Added a new section titled “RIG STACKING INFORMATION” with the following:

- Rig Arrival Date;
- Rig Departure Date;
- Manned (warm);
- Un-manned (cold);
- Location;
- Any modifications, repairs, or construction: Yes/No;
- Date of modifications, repairs, or construction;
- Area Name;
- Block No.;
- Latitude (Optional);
- Longitude (Optional);
- Area Clearance Information (Optional);
- Is Area Clear of Obstructions? Yes/No;
- If No, Explain;
- Remarks (Explain any modifications, repairs, or construction.);

Added Certification Statement declaring all information submitted is complete and accurate to the best of signatory’s knowledge; and

Revised heading for BSEE OCS Contact Information; and added Alaska and Pacific Regions contact information.

The seven forms use and information consists of the following:

Subpart D:

End of Operations Report, BSEE-0125

This information is used to ensure that industry has accurate and up-to-date data and information on wells and leasehold activities under their jurisdiction and to ensure compliance with approved plans and any conditions placed upon a suspension or temporary probation. It is also used to evaluate the remedial action in the event of well equipment failure or well control loss. The Form BSEE-0125 is updated and resubmitted in the event the well status changes. In addition, except for proprietary data, BSEE is required by the OCS Lands Act to make available to the public certain information submitted on BSEE-0125.

Information on form BSEE-0125:

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

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

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

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

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

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

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

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

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

Well Activity Report, BSEE-0133 and -0133S

BSEE uses this information to monitor the conditions of a well and status of drilling operations. We review the information to be aware of the well conditions and current drilling activity (i.e., well depth, drilling fluid weight, casing types and setting depths, completed well logs, and recent safety equipment tests and drills). BSEE uses this information to determine how accurately the lessee anticipated well conditions and if the lessee or operator is following the other approved forms that were submitted. With the information collected on BSEE-0133 available, the reviewers can analyze the proposed revisions (e.g., revised grade of casing or deeper casing setting depth) and make a quick and informed decision on the request. In addition, except for proprietary data, BSEE is required by the OCS Lands Act to make available to the public certain information submitted on Forms BSEE-0133 and -0133S.

Information on form BSEE-0133:

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

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

Well Bore Historical Information - Identifies the dates drilling is initiated and completed or the well is abandoned and final measured and true vertical depths reached. This information is

needed to evaluate modification applications to ensure safety and protection of the environment.

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

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

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

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

Information on form BSEE-0133S:

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

Open Hole Tools, Mudlogs, and Directional Surveys - Identifies the dates and types of open hole operations, logs, tests, or surveys conducted; the service company(s) conducting the operations; and the top and bottom of those formations logged or surveyed. Serves as an inventory to ensure that BSEE receives the data from all open hole logs/tests/surveys conducted. Open hole data is utilized in the determination of oil and gas recoverable reserves and production limits. As permitted by the regulations, the data is also made available to the public.

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

Application for Permit to Drill (APD)

BSEE-0123 and BSEE-0123S - This ICR includes forms, APD-BSEE-0123 and Supplemental APD Information Sheet-BSEE-0123S. In this submission, while we increased the annual hour burden for new requirements, the responses and application fee remained unchanged; therefore, we did not list the non-hour costs burdens in the burden table since they will not change.

BSEE uses the information from these forms to determine the conditions of a drilling site to avoid hazards inherent in drilling operations. Specifically, we use the information to evaluate the adequacy of a lessee's or operator's plan and equipment for drilling, sidetracking, or deepening operations. This includes the adequacy of the proposed casing design, casing setting depths, drilling fluid (mud) programs, cementing programs, and BOP systems to ascertain that the

proposed operations will be conducted in an operationally safe manner that provides adequate protection for the environment. BSEE also reviews the information to ensure conformance with specific provisions of the lease. In addition, except for proprietary data, BSEE is required by the OCSLA to make available to the public certain information submitted on Forms BSEE-0123 and -0123S.

Information on form BSEE-0123:

Heading: BSEE uses the information to identify the type of proposed drilling activity for which approval is requested.

Well at Total Depth/Surface: Information utilized to identify the location (area, block, lease, latitude and longitude) of the proposed drilling activity.

Significant Markers Anticipated: Identification of significant geologic formations, structures and/or horizons that the lessee or operator expects to encounter. This information, in conjunction with seismic data, is needed to correlate with other wells drilled in the area to assess the risks and hazards inherent in drilling operations.

Certification Statement declaring all information submitted is complete and accurate to the best of signatory's knowledge.

Question/Information: The information is used to ascertain the adequacy of the drilling fluids (mud) program to ensure control of the well, the adequacy of the surface casing compliance with EPA offshore pollutant discharge requirements and the shut in of adjacent wells to ensure safety while moving a rig on and off a drilling location, as well that the worst case discharge scenario information reflects the well and is updated if applicable. This information is also provided in the course of electronically requesting approval of drilling operations via eWell.

Information on form BSEE- 0123S:

Heading: BSEE uses this information to identify the lease operator, rig name, rig elevation, water depth, type well (exploratory, development), and the presence of H₂S and other data which is needed to assess operational risks and safety.

Well Design Information: This engineering data identifies casing size, pressure rating, setting depth and current volume, hole size, mud weight, BOP and well bore designs, formation and BOP test data, and other criteria. The information is utilized by BSEE to verify operational safety and ensure well control to prevent blowouts and other hazards to personnel and the environment. This form accommodates requested data collection for successive sections of the borehole as drilling proceeds toward total depth below each intermediate casing point.

Certification Statement declaring all information submitted is complete and accurate to the best of signatory's knowledge.

Application for Permit to Modify (APM)

BSEE-0124 - In this submission, while we have increased the annual hour burden for new regulatory requirements, the responses and application fee remained unchanged; therefore, we did not list the non-hour costs burdens in the burden table since they will not change.

We use the information to determine the conditions of the site to avoid hazards inherent in drilling/well operations. Specifically, we use the information to evaluate and approve the adequacy of the equipment, materials, and/or procedures that the lessee or operator plans to use during drilling/well plan modifications and changes in major equipment. In addition, except for proprietary data, BSEE is required by the OCS Lands Act to make available to the public certain information that is submitted.

Information on form BSEE-0124:

Heading: - Information to identify the well name, lease operator, type of revision and timing of the proposed modifications.

Well at Total Depth/Surface: - Information utilized by BSEE to identify the unique location (area, block and lease of the proposed activity).

Proposed or Completed Work: - Information identifying the specific activity, revision or modification for which approval is requested. This includes specific identification of equipment, engineering, and pressure test data needed by BSEE to ascertain that operations will be conducted in a manner that ensures the safety of personnel and protection of the environment.

Question Information: - Responses to questions (a) through (h) serve to ascertain compliance with applicable BSEE regulations, requirements, and adherence to good operating practices, as follows:

- Question a – Serves to ensure the submittal of a contingency plan to mitigate the presence of a dangerous concentration of H₂S.
- Question b – Information is needed to monitor possible lease expiration in the event proposed operations/modifications are unsuccessful.
- Question c – Information is needed to ascertain that adjacent wells and/or equipment are shut-in while moving heavy rig equipment on/off location in the interest of personnel safety and protection of the environment.
- Question d – Information is needed to ensure that down-hole commingling of hydrocarbon production from separate sand formations has been reviewed and determined to meet conservation requirements for oil/gas reserves.
- Question e – Information is needed to ensure that wells completed for hydrocarbon production within 500 feet of a block (lease) line have been reviewed to mitigate inequitable

drainage of reserves from adjacent leases.

- Question f – Information is needed to ensure that the casing will be cut and removed to a depth 15 feet below the seafloor (mud line) to preclude possible damage to trawl/fishing nets.

Certification Statement declaring all information submitted is complete and accurate to the best of signatory's knowledge.

Subpart G

Rig Movement Notification Report, Form BSEE-0144

We use the information to schedule inspections and verify that the equipment being used complies with approved permits. The information on this form is used by all 3 regions, but primarily in the GOM, to ascertain the precise arrival and departure of all rigs in OCS waters in the GOM. The accurate location of these rigs is necessary to facilitate the scheduling of inspections by BSEE personnel.

Information on form BSEE-0144:

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

Rig Arrival Information - Identifies the rig arrival date; what type of work will be scheduled; if the rig is new to OCS and location rig came from; relevant well information; duration of operations, and optional information;

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

Rig Stacking Information – Identifies rig arrival/departure date, warm or cold stacked and location, any modification, repairs, or construction and the date, relevant well information, optional information, obstruction issues;

Certification Statement declaring the information submitted is complete and accurate to the best of signatory's knowledge; and

BSEE OCS Contact Information.

Once this rulemaking becomes effective, any revisions to the forms will be added to the forms and the eWell screenshot(s); the revised PRA statement will be posted on the eWell website.

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.

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 of the forms listed in this collection electronically using a secure web application in lieu of submitting paper forms. We estimate that an average of 85 percent of submittals pertaining to this collection will be 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 MOUs are effective in avoiding duplication of regulations and reporting requirements. The information collected is specific to a well, a lessee/operator, or a particular request for BSEE approval and is unique to the site and well operation.

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 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.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If BSEE did not collect the information, we could not determine whether lessees and operators are properly providing for the safety of drilling, workover, completion, and decommissioning operations; and the protection of the environment and resources. The information is generally collected on occasion of drilling activity and initiated by respondents' activity. During drilling operations, respondents must submit reports on a daily (or weekly in the Gulf of Mexico (GOMR)) basis. We must have accurate and timely information on the condition of the drilling site to be able to make informed decisions on requests for alternative compliance and departures and for inspection purposes. Respondents maintain the information reported on a daily basis, and the burden of submitting to BSEE is not substantial. Quarterly reporting would be ineffectual.

BSEE also needs this information for the approval, disapproval, or modification process for well operations; to ensure cement jobs are adequate for the well conditions, and that industry can demonstrate source control and containment capabilities; information on production packer setting depth would ensure consistent permitting.

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;

Depending on the operation, respondents will have to submit the Well Activity Report (BSEE-0133 and -0133S) weekly in the GOMR and daily in the Pacific Outer Continental Shelf Region POSCR and the Alaska Outer Continental Shelf Region (AOCSR); as well as submit a Rig Movement Notification Report (BSEE-0144) every time a rig is moved on or off location (again, depending on the operation being performed, some respondents will submit more than quarterly, but is generally on occasion).

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

Not applicable in this collection.

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

When submitting paper copies, respondents are required to submit four copies of APDs, BSEE-0123 and BSEE-123S; and APMs, BSEE-0124: one approved copy each for the OCS Region, the lessee, the lessee's contractor, and the public. The copy for the public will not include proprietary data that is 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;

- Respondents must maintain design, maintenance, inspection, and repair records for the service life of the equipment. Results of BOP inspections and maintenance actions may have to be retained for more than 2 years, if so directed, due to any potential operational design parameter issues.

- A detailed report documenting the once every 5-year inspection, along with any problems and corrections will need to be maintained from one inspection to the next to verify any recordable actions between inspections.

- Respondents are required to retain some well completion/well workover records until the well is permanently plugged or abandoned or the records are forwarded with a lease assignment. This could be longer than 3 years; however, it is critical that the records be available that relate to any alteration of the completion configuration or that affect activities on a hydrocarbon-bearing zone.

(e) in connection with a statistical survey, that is not designed to produce valid and reliable

results that can be generalized to the universe of study;

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

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

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

Not applicable in this collection.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.11, 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 1320.11, BSEE provided the 60-day review and comment process through the preamble of the proposed rulemaking (80 FR 21504, April 17, 2015). We received, in response to the proposed rule, 172 sets of comments grouped by commenter and subject matter from individual entities (companies, industry organizations, or private citizens), of which, 12 comments pertained to information collection.

Comments pertaining to this ICR were received by:

The American Petroleum Institute (API), the International Association of Drilling Contractors (IADC), the Independent Petroleum Association of America (IPAA), the National Ocean Industries Association (NOIA), the Offshore Operators Committee (OOC), the Petroleum Equipment & Services Association (PESA), and the US Oil and Gas Association (as one joint industry comment),
Pacific Drilling,
Chevron North America E&P Co.,
ENSCO,

LLOG Exploration L.L.C,
GE Oil & Gas,
Anadarko,
The International Association of Drilling Contractors,
Stone Energy,
Murphy E&P, and
Exxon Mobil

Comments received discussed various items such as, but not limited to, Applications for Permit to Drill, Applications for Permit to Modify, rig notifications, additional information for Mobile Offshore Drilling Units, Real Time Monitoring requirements and plans, verifications for BSEE-Approved Verification Organization and supporting information, and retention of drilling records. The commenters discussed the additional burden and felt, in some cases, that the estimated burden was not necessarily sufficient. Therefore, based on these comments there are changes to the paperwork requirements and/or burdens and these changes are as follows:

Applications for Permit to Drill (APD) - we increased the burden hours (+**510** hours);

Applications for Permit to Modify - we increased the burden hours (+**2,411** hours);

Also, while reviewing comments on the final rule it became more clear that under § 250.712 (a), (b), and (f), we were counting the number of physical rigs on the OCS rather than counting the number of rig movement forms submitted. Therefore, we increased the number of response and burden to accurately reflect the number of forms submitted (+681 responses and +**166** hours);

Under § 250.712(c), (e) – we increased the burden hours relating to notifications if rigs are warm or cold stacked (+25 responses and +**12** hours);

The burden hours for § 250.713(a), (b) - information on MODUs – we revised the burden for collecting and reporting additional information (+466 responses and +**2,330** hours);

Under § 250.724 - RTM burden hours were increased (-20 responses and +**64,200** hours);

Under § 250.724(c) - we added burden hours for the requirement to develop and implement an RTM plan (+130 responses and +**650** hours);

Under § 250.732(a) – we increased burden hours for the requirement to submit a verification and supporting information for BAVO (+2 responses and +**675** hours);

The burden hours in §§ 250.740, 250.741, and 250.724(b) for retention of drilling records and RTM data were increased (+95 responses and +**35** hours);

During the proposed rule, we inadvertently entered the wrong hour burden under the subtotal for Subpart G (Rig. Req. 1,783 hours should have been 1,633 hours); therefore, we have decreased the subtotal (-150 hours);

Also, between the proposed rule and the final rule numerous ICs were submitted to OMB resulting in increases/decreases in OMB approved burdens and responses of various regulatory requirements associated with the proposed rule (+577 responses and +22,797 hours) (NOTE: see www.reginfo.gov for all of BSEE's ICs); and

Due to the IC renewals, the number of responses changed, which also affected two revised burdens: Subpart B - DWOP (-4 hours) and Subpart D - EOR (+40 hours).

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

BSEE will not provide payment or gifts to respondents in this collection.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

We protect information considered proprietary under the Freedom of Information Act (5 U.S.C. 552) and DOIs implementing regulations (43 CFR 2), and under regulations at 30 CFR Part 250.197, *Data and information to be made available to the public or for limited inspection*, 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 comprise Federal oil and gas OCS lessees and operators. It should be noted that not all of the potential respondents will submit information at any given time 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 the collection of information. Responses to this collection of information are mandatory, or are required to obtain or retain a benefit. Submissions are generally on occasion, daily, weekly, monthly, quarterly, biennially, and as a result of situations encountered depending upon the requirement. We estimate the total annual reporting and recordkeeping burden is 285,111 hours. Refer to the chart for a breakdown of the burden hours.

BURDEN TABLE

[Current regulations are regular font with an asterisk (*); *Italic* font show *revision(s)* of existing requirements; and **bold** font indicates **new** requirements]

BSEE-Approved Verification Organization = BAVO

30 CFR 250 Current Revision NEW	Reporting & Recordkeeping Requirement+	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (rounded)
Subpart A				
107(e)	Produce and submit documents ordered by BSEE to ensure compliance with this part.	Burden covered under various 30 CFR 250 regulations (depending on the operational requirement(s)).		0
141; 198; 701; 720(a)(2); 721(d); 730(d)(1); 1612	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; 702	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*
Subtotal (A)			1,835 responses	32,878 hours*
Subpart B				
287; 291; 292(p)	Submit DWOP and accompanying/ supporting information. <i>Provide detailed information/descriptions pertaining to pipeline free standing hybrid riser (FSHR). Submit documentation for pipeline FSHR certification and have verified by CVA.</i>	1,140	11 plans	12,540*
		4		44
Subtotal (B)			11 responses	12,540 hours* 44 hours 12,584 hours
Applications for Permit to Drill (APD)				
410-418; 420(a)(7); 423(c)(1); 428(b), (k); plus various references in Subparts A, D, E, F, G (701; 702; 713(a), (b), (e), (g); 720(b); 721(g)(4); 724(b); 731; 733(b); 734 (c); 737(a)(3), (b)(2), (b)(3), (d)(2-4), (d)(12); 738(f), (m), (n); H; and P	Apply for permit to drill APD (Form BSEE-0123) that includes any/all supporting documentation /evidence (including, but not limited to, test results, calculations, pressure integrity, kill weight fluids, verifications, certifications, procedures, criteria, qualifications, diverter descriptions; planned safe drilling margin; rig anchor pattern plats; contingency plan (move off info/ current monitoring); description of your BOP and its components and schematic drawings; descriptive schematic (pressure ratings, dimensions, valves, load shoulders; locking mechanisms; location of ruptured disks; description of mudline level to displace cement; how operator visually monitors returns; PE certification re changes to casing setting depths; BAVO reports; description of source control and containment capabilities; EDS; pipe variable bore rams; annulus monitoring plan information; any additional information required by District Manager; etc.) and requests for various approvals required in Subpart D (including §§ 250.414(h); 418(g); 427, 428, 432, 460, 490(c)) and submitted via the form; upon request, make available to BSEE.	114.98	408 applications	46,912*
		4		1,632
420(b)(4); 428; 465(a)(1); 721(e)(4);	Obtain approval to revise your drilling plan [changes to the casing], or change major drilling equipment by submitting a revised Form BSEE-0123. Application for Permit to	1.34	662 submittals	888*

*

Indicates burdens are covered under one of the following OMB approved control numbers: 1014-0022, Subpart A; 1014-0024, Subpart B; 1014-0018, Subpart D; 1014-0004, Subpart E; 1014-0001, Subpart F; 1014-0006, Subpart P; 1014-0010, Subpart Q; 1014-0013, GPS for MODUs; 1014-0025, APDs; or 1014-0026, APMs.

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

NOTE: The burden changes as a direct result of implementing the final rule would be the combination of Revised burden and NEW burden above (4,381 responses and 87,628 burden hours). The Number of responses in the "Change Due to Adjustment in Agency Estimate" in ROCIS is overstated 3,312 responses. This is because the changes in Subpart B, APDs, and APMs increased the burden hours per response but did not increase the number of responses. Due to ROCIS limitations we had to add those responses into the corresponding Information Collections to ensure the burden hours are reflected correctly. This issue will be resolved when the changes are incorporated into the original 10 ICRs noted above.

(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 \$73/hour (rounded). This cost is broken out in the below table using the Bureau of Labor Statistics. See BLS.gov website: <http://data.bls.gov/cgi-bin/dsrv?nw>.

Position	Base Pay Hourly Rate (\$/hr) (rounded)	Hourly Rate including Benefits (rounded) (1.43* x \$/hr)	Percent of time spent on collection	Weighted Average (\$/hour/ rounded)
Mid-level engineer	\$62	\$89	55%	\$49
Administrative staff	\$17	\$24	5%	\$1
Technician	\$40	\$57	40%	\$23
Weighted Average (\$/hour)				\$73

* A multiplier of 1.43 (as implied by BLS news release USDL-16-0463, March 10, 2016 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)), was added for benefits.

Based on a cost factor of \$73 per hour, we estimate the hour burden as a dollar equivalent is \$20,813,103 (\$73 x 285,111 hours = \$20,813,103).

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.

This rule proposes to codify NTL 2013-G01, Global Positioning Systems for Mobile Offshore Drilling Units (currently approved OMB control number 1014-0013). Since the lessees and operators have already installed the GPS systems, we estimate a non-hour cost burden of \$102,500 which consists of:

- replacing/repairing locator devices and/or adding devices for new MODUs added to the group; 20 devices per year for replacement and/or new x \$325.00 = \$6,500*.

- paying monthly rental fees for GPS tracking purposes only, 40 rigs x \$50/month = (\$600/year per 1 rig) = \$24,000*.

or

- paying rental fees for the GPS devices themselves as well as associated tracking information. 40 rigs @ \$1,800 per year = \$72,000*.

Once the final rule becomes effective, we will discontinue the information collection, 1014-0013, NTL - GPS for MODUs. We have identified no other non-hour cost burdens for this collection of information. See burden table in A.12 for a breakdown of the burdens.

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.

To analyze and review the information required by Subpart G, we estimate the Government will spend an average of approximately 0.75 hour for each hour spent by the respondents for a total of 213,833 (rounded) hours.

In addition, we expect the Government to spend 80 hours per application in the first year to process approximately 15 BAVO applications, 40 hours per application in the second year to process 3 annual BAVO applications; and 40 hours per application in the third through tenth years to process 2 annual BAVO applications. This averages out to 3.4 applications per year and a per year burden hour for the government of 196 hours.

The average cost to the government is \$65/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*)
Administrative	GS-7/5	\$21	\$32	10%	\$3
Engineer(s)/Geologists	GS-13/5	\$45	\$68	80%	\$54
Supervisory	GS-14/5	\$53	\$80	10%	\$8
Weighted Average (\$/hour)					\$65

* Rounded

** A multiplier of 1.5 (as implied by BLS news release USDL-16-0463, March 10, 2016 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)), was added for benefits.

Based on a cost factor of \$65 per hour, we estimate the total annual cost to Government is \$13,911,885 (285,111 hours x 0.75 = 213,833 (rounded) hours+196 BAVO related hours=214,029 x \$65 = \$13,911,885).

15. Explain the reasons for any program changes or adjustments.

The program changes and/or adjustments are as follows:

This ICR deals with ten of BSEE’s already approved ICR’s. The currently approved burden hours represent 197,483 hours and \$102,500 non-hour cost burdens.

New or revised requirements are considered program changes and they represent 87,628 burden hours and no new/additional non-hour cost burdens.

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.

In accordance with § 250.197, BSEE will make available public copies of APDs and APMs. We protect information considered proprietary under the Freedom of Information Act (5 U.S.C. 552)

and DOIs implementing regulations (43 CFR 2), and under regulations at 30 CFR Part 250.197, *Data and information to be made available to the public or for limited inspection*, 30 CFR Part 252, *OCS Oil and Gas Information Program*.

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.

BSEE will display the OMB control number (§ 250.199) and approval expiration date on all forms.

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

We are not making any exceptions to the “Certification for Paperwork Reduction Act Submissions.”