

**Supporting Statement A**  
**30 CFR Part 784: Underground Mining Permit Applications—**  
**Minimum Requirements for Reclamation and Operation Plan**

**OMB Control Number 1029-0039**

**Terms of Clearance:** None

**Introduction**

This information collection clearance package is being submitted by the Office of Surface Mining Reclamation and Enforcement (OSMRE) to request information collection renewal authority for 30 CFR Part 784 - Underground Mining Permit Applications—Minimum Requirements for Reclamation and Operation Plan. Part 784 specifies what an applicant for a permit for an underground coal mine must include in the reclamation plan component of the permit application. OMB previously renewed and approved the collection of information and recordkeeping requirements for this part under control number 1029-0039.

Since the last collection clearance package was approved in 2014, there have been no program changes. However, we are now including significant revisions for underground mines in our number of respondents for 30 CFR part 784, both now and in the future. We are doing so because significant revisions (those revisions that add acreage but are not incidental boundary revisions) often require nearly the same amount of operator preparation and regulatory authority review as a new underground permit. Although there has been a significant decrease in the number of new permit applications for underground mines in the past three years, this decrease is mostly offset by the addition of including significant revisions in our respondent count. However, the average hourly burden for permit applicants to prepare these specific portions of an underground mining permit application or a significant revision, and for the regulatory authority to review an application, has noticeably increased in the past three years. Except as otherwise noted in the supporting statements for individual sections, the annual respondents and potential respondents consist of 9 underground coal mining permit applicants and 31 applicants for a significant revision to an existent underground mine, for a total of 40 respondents, together with 24 state regulatory authorities. We will assume that one of the 40 annual applications will be submitted in a state or on Indian lands where OSMRE is the regulatory authority.

**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 ICR contain surveys, censuses, or employ statistical methods?” is checked "Yes," then a Supporting Statement B must be completed. 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.**

Section 516(d) of the Surface Mining Control and Reclamation Act (SMCRA or the Act) provides that the permitting requirements of Title V of SMCRA are applicable to surface operations and surface impacts of underground mines, although the Secretary must modify those requirements by rulemaking in recognition of the distinct differences between surface and underground mining. Sections 507(d) and 508(a) of SMCRA requires that each permit application include a reclamation plan containing certain information.

- 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.\**

784.11: This section requires a narrative description of the mining methods, engineering techniques, and major equipment planned for use in the operation, and a description of the anticipated production of the mine. This section also requires a narrative description of the planned use of certain listed facilities, including construction, modification, maintenance, and removal of such facilities. This information is necessary to enable the regulatory authority to evaluate the cumulative impact of the proposed operations on the resources of the area, including the hydrologic balance, land, vegetation, and fish and wildlife. In addition, this information will aid the regulatory authority in determining whether the applicant can meet the applicable performance standards of this Chapter.

784.12: This section requires the permit applicant to provide a description of each existing structure proposed to be used in the mining or reclamation operation and a compliance plan for structures proposed to be modified or constructed for use in the operation. Section 516(d) of SMCRA provides that the permitting requirements of Title V of SMCRA, including those of section 507(b)(13), are applicable to surface operations and surface impacts of underground mines. The regulatory authority uses the information collected under this section to determine if existing structures can comply with the performance standards in Part 817 of our regulations, and, if not, what modifications are needed.

784.13: This section requires a detailed timetable for the completion of each major step in the reclamation plan and a detailed estimate of the cost of reclamation together with supporting calculations, and is necessary for the regulatory authority to determine the amount of the bond. Information includes plans for spoil handling, soil replacement, revegetation, conservation of the coal resource, acid/toxic material handling, combustible material handling, sealed or managed mine openings complying with the Clean Air Act and the Clean Water Act.

784.14: The permit applicant gathers hydrologic information to develop the determination of the probable hydrologic consequences of the proposed operation, as required by the statute, and to provide a baseline for the monitoring program also required by the statute. The regulatory authority uses the information to assist in evaluating the probable impacts of the operation on surface and ground water systems and in preparing the cumulative hydrologic impact assessment, as well as determining whether the operation has been designed to meet the hydrologic protection requirements of the statute.

784.15: This section requires permit applicants to provide a description of the current land use, its productivity, the proposed postmining land use, and documentation regarding comments received from the landowners and state and local governments concerning the postmining land use. Section 784.15 implements subsections (a)(2)(A), (B), and (C) and (a)(3) and (4) of section 508 of SMCRA with respect to underground mines. The regulatory authority uses the information required in section 784.15 in making decisions on proposed postmining land uses and provides a baseline for determination of revegetation success. Failure to submit this information would hamper assessment of reclamation success.

784.16: This section contains design and other permit application requirements for siltation structures, impoundments, and refuse piles. Both permit applicants and SMCRA regulatory authorities use the information required by this section to ensure that siltation structures, impoundments, and refuse piles are designed to protect safety, property, and the environment.

784.17: This section requires the permit applicant to describe measures that will be taken as part of the proposed surface coal mining operations to prevent or minimize adverse impacts to publicly owned parks and places listed on the National Register of Historic Places, as required by section 522(e)(3) of SMCRA. This information will enable the regulatory authority to determine whether the operation has been designed to meet the requirements of section 522(e)(3) of SMCRA, which prohibits surface coal mining operations that will have adverse effects on publicly owned parks or places listed on the National Register of Historic Places unless the agency with jurisdiction over the park or place grants joint approval or the applicant has valid existing rights.

784.18: This section requires that the permit application include a description of the measures to be taken to protect the interests of the public and affected landowners when mining is to take place within 100 feet of a public road or when a public road is to be relocated, reflect this requirement. The regulations implement, in part, section 522(e)(5) of the Act, which requires that the regulatory authority ensure the protection of the public and affected landowners in these situations. The regulatory authority uses the information collected under this section to fulfill its responsibilities to protect the public and affected landowners under section 522(e)(5) of SMCRA.

784.19: This section establishes permit application requirements for the disposal of excess spoil from underground mines. It requires that the permit application include a statement of the engineering techniques to be used in mining and reclamation, as well as a description of how the operation will comply with each requirement of section 515 of SMCRA. The regulatory authority uses the geotechnical investigation and fill design requirements of this section to ensure

that excess spoil is disposed of safely in a stable manner with a minimum of adverse environmental impacts.

784.20: Section 516(b)(1) of SMCRA requires each operator of an underground mine to prevent subsidence that would cause material damage, to the extent technologically and economically feasible. Our regulations at 30 CFR 784.20 contain permitting requirements, including preparation of a subsidence control plan, related to this performance standard. Those regulations also contain permitting requirements intended to support the implementation of section 720 of SMCRA, which requires the correction of subsidence-related material damage to certain structures and the replacement of domestic water supplies adversely impacted by underground mining operations. The regulatory authority uses the preliminary survey information provided under 30 CFR 784.20 to determine whether a subsidence control plan is needed. It also may use the information provided under this section to evaluate future claims of subsidence damage.

784.21: This section requires that each application for an underground mine include baseline fish and wildlife resource information for the proposed permit and adjacent areas. It also requires submission of a fish and wildlife protection and enhancement plan. Those requirements are intended to assist implementation of section 516(b)(11) of SMCRA, which requires that coal mining operations be conducted to minimize disturbances and adverse impacts to fish, wildlife, and related environmental values and achieve enhancement where applicable. The regulatory authority uses the information provided under 30 CFR 784.21 to ensure that the operation is designed meet the requirements of section 516(b)(11) of SMCRA to minimize disturbance and adverse impacts on fish, wildlife and related environmental values to the extent possible using the best technology currently available.

784.22: This section requires that the permit application include various geologic data and analysis of geologic information to determine the probable hydrologic consequences of the proposed mining operations and any potentially acid- or toxic-forming substances that may affect the quality of surface waters or groundwater systems. The regulatory authority uses the information submitted under 30 CFR 784.22 to evaluate the adequacy of the hydrologic reclamation plan for the proposed operation, to determine whether a toxic materials handling plan is needed, to ascertain whether discharge treatment will be needed and whether those discharges will cease after mining and reclamation, to determine whether reclamation is feasible, and prepare the cumulative hydrologic impact assessment required by SMCRA for issuance of a permit.

784.23: This section requires each applicant to submit maps, plans, and cross-sections of the proposed permit area and the adjacent area. The regulatory authority uses the maps, cross-sections, and plans submitted with the application to ensure that the operation has been located and designed in accordance with the requirements of SMCRA.

784.24: This section specifies design requirements for roads in permit applications and requires that operators refrain from constructing roads in or near streams. The regulatory authority uses the design requirements for roads in 30 CFR 784.24 to ensure that mining permits adhere to the requirements of the Act with respect to surface coal mining operations in general and road placement in particular.

784.25: This section governs the disposal of coal processing waste in abandoned underground mines. The regulatory authority uses the information collected under this section to ensure that disposal of coal processing waste in underground mines does not cause material damage to the hydrologic balance or pose a stability problem.

784.29: This section requires that the permit application include designs for all stream-channel and other diversions and include a plan for the control of surface water drainage. The regulatory authority uses the information provided under this section to ensure that mining operations are designed to protect the hydrologic balance and safely control surface runoff.

784.30: The regulations at 30 CFR 784.30 require that the permit application include designs for support facilities consistent with the performance standards for those facilities at 30 CFR 817.181. The regulatory authority uses the information provided under this section to ensure that support facilities are designed to ensure compliance with performance standards.

- 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.***

At the discretion of the regulatory authority, persons may submit responses electronically to the extent that both parties have the requisite technical capability. Further, permit applicants have been increasingly using electronic means to prepare their permit applications using word processing, AutoCAD and GPS software applications. Several states, such as Kentucky and Virginia, receive 90% of their permit applications electronically. Other states are not yet prepared to receive applications electronically because of other priorities or the limited size of their program. We estimate that on a national basis, 75% of all permit applications are submitted by electronic means. We hope that this figure will improve over time as more states and permit applicants realize the time and cost savings associated with electronic submissions.

- 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 information requested under 30 CFR Part 784 is collected infrequently (generally only once, at the time that a person applies for a permit). Therefore, duplication is minimal to nonexistent. When submitting an application for a permit revision, permittees may cross-reference relevant materials previously submitted in a permit application.

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

There are no special provisions for small organizations. While small operators may be eligible for financial assistance under the Small Operators Assistance Program (SOAP), Congress has not appropriated money for that program in recent years.

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.***

A reduction in the frequency of collection is not possible because the information requested under 30 CFR Part 784 is collected only once for each site for a new permit, or when a permittee submits a significant revision for approval.

7. ***Explain any special circumstances that would cause an information collection to be conducted in a manner:***
- \* requiring respondents to report information to the agency more often than quarterly;***
  - \* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;***
  - \* requiring respondents to submit more than an original and two copies of any document;***
  - \* requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;***
  - \* 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;***
  - \* requiring the use of a statistical data classification that has not been reviewed and approved by OMB;***
  - \* 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***
  - \* 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.***

No collection of information under 30 CFR Part 784 is inconsistent with the guidelines at 5 CFR 1320.5(d)(2) as summarized in the instructions for this item of the supporting statement.

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 three 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 three 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.***

OSMRE contacted the following state regulatory authorities and a mining consulting firm that prepares mining permit applications. We requested their input on the associated information collection requirements and any other comments they wished to make regarding the clarity of the rules and potential burdens.

Pennsylvania Department of Environmental Protection  
25 Technology Drive  
California Technology Park  
Coal Center, PA 15423

Indiana Department of Natural Resources  
Division of Reclamation  
14619 West State Road 48  
Jasonville, IN 47438

Utah Division of Oil, Gas, and Mining  
1594 West North Temple, Suite 1210  
Box 145801  
Salt Lake City, UT 84114-5801

Office of Surface Mining Reclamation and Enforcement  
Program Support Branch  
Knoxville Field Office  
710 Locust Street, 2<sup>nd</sup> floor  
Knoxville, TN 37902

Consolidation Coal Company  
CNX Center  
1000 Consol Energy Drive  
Canonsburg, PA 15317-6506

Gibson County Coal, LLC  
PO Box 1269  
Princeton, IN 47670

The persons contacted at the offices listed above had no concerns or complaints to the requirements of 30 CFR 784.11 thru 784.30. They did provide new burden estimates for each section which has been included in the table in item 12, below.

On August 16, 2017, OSMRE published in the *Federal Register* (82 FR 38932) a notice requesting comments from the public regarding the need for the collection of information, the accuracy of the burden estimate, ways to enhance the information collection, and ways to minimize the burden on respondents. This notice gave the public 60 days in which to comment. However, no comments were received.

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

OSMRE and state regulatory authorities provide no payments or gifts to respondents except for grants to states authorized by law.

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

The permit applicant has the right to request confidentiality for certain information, for example, analyses of the chemical and physical properties of the coal to be mined. Sections 507(b)(17), 508(a)(12), and 508(b) of SMCRA require that certain types of permit application information be kept confidential if requested by the permit applicant and approved by the regulatory authority. The Archeological Resources Protection Act of 1979, 16 U.S.C. 470, requires that information on the nature and location of archeological resources on public lands and Indian lands be kept confidential.

**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.**

Sensitive questions are not asked.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

**\* 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.**



**\* If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**

**\* 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 Federal Government.”**

a. Burden Hour Estimates for Respondents

The following table summarizes the information collection requirements and changes to the current collection burden for 30 CFR part 784.

SUMMARY FOR 30 CFR PART 784

Section	Industry Responses	Industry Hours per Response	State Responses	State Hours per Response	Total Hours Requested	Currently Approved Burden Hours	Changes to Burden Hours
784.11	40	16	39	4	796	312	0
.12	5	7	4	3	47	47	0
.13	40	55	39	20	2,980	2,583	0
.14	40	80	39	40	4,760	2,185	0
.15	40	8	39	2	398	314	0
.16	40	30	39	20	1,980	1,160	0
.17	1	6	1	5	11	11	0
.18	16	12	15	2	222	178	44
.19	30	10	29	14	706	702	4
.20	40	14	39	6	794	716	0
.21	40	10	39	8	712	532	0
.22	40	30	39	8	1,512	1,344	0
.23	40	70	39	10	3,190	2,130	0
.24	40	30	39	4	1,356	1,098	0
.25	19	15	18	4	357	206	151
.29	40	20	39	5	995	940	0
.30	40	16	39	4	796	448	0
TOTALS					21,612	0	0

b. Estimated Annual Wage Cost to Respondents

OSMRE has estimated wage costs for respondents working in industry and those working as state regulatory employees. OSMRE has derived these wages from the Bureau of Labor Statistics (BLS) websites at ([http://www.bls.gov/oes/current/naics4\\_212100.htm](http://www.bls.gov/oes/current/naics4_212100.htm) for industry wages, and [http://www.bls.gov/oes/current/naics4\\_999200.htm](http://www.bls.gov/oes/current/naics4_999200.htm) for state employee wages. Benefits are included in these wage calculations using a rate of 1.4 of the salary for industry personnel and 1.6 for state employees per the BLS news release USDL-17-1222, EMPLOYER COSTS FOR EMPLOYEE COMPENSATION—JUNE 2017, dated September 8, 2017 (<http://www.bls.gov/news.release/pdf/ecec.pdf>).

Industry reported that their permit application staff consisted of a combination of mining engineers, civil engineers, hydrologists, wildlife biologists, geologists, engineering technicians, real estate/land specialists, and administrative support. The exact combination of disciplines varies by company and/or preparer.

OSMRE has estimated the wage cost as follows, including benefits:

Industry Wage Cost			
Position	Hourly Rate with Benefits (x 1.4)	Percent of time spent on collection	Weighted Average Wage Burden per Hour
Administrative Support	\$23.21	5%	\$1.16
Earth Drillers	\$32.03	7%	\$2.24
Samplers	\$33.01	4%	\$1.32
Engineering Technician	\$40.01	20%	\$8.00
Environmental Technician	\$43.32	12%	\$5.20
Environmental Engineer	\$56.32	4%	\$2.25
Geological/Mining Engineer	\$59.40	43%	\$25.54
Operations Manager	\$97.68	5%	\$4.88
Total		000%	0

At an average cost of \$50.59 per hour, the estimated total annual cost for industry respondents is 15,978 hours x \$50.59 = \$808,327.

State regulatory authorities reported that their review staff consisted of a combination of hydrologists, biologists, engineers, geologists, engineering technicians, soils scientists, and reclamation specialists. The exact combination of disciplines varies by regulatory authority. For simplicity, we will assume that the salary of an engineering technician represents an average approximation of the various disciplines of the state review team. Using wage costs for a state employee engineering technician, we estimate that the wage cost is \$36.46 per hour including benefits. Since it takes state regulatory authorities 5,634 hours to review and prepare findings required by this part, we estimate that the total wage cost to all state regulatory authorities is \$36.46 x 5,634 hours = \$205,416 (rounded).

Therefore, the estimated annual wage burden for all respondents is \$808,327 for industry + \$205,416 for state regulatory authorities = \$1,013,743.

- 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.)**
- \* The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) 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.**
  - \* If cost estimates are expected to vary widely, agencies should present ranges of cost burdens 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.**
  - \* 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.**

Non-labor cost information was provided by the engineering companies and includes permit application costs for items such as equipment, copying, travel to the mine site and other locations for data collection, newspaper publications, laboratory analysis, and postage.

SUMMARY OF NON-WAGE COSTS FOR 30 CFR PART 784

Section	Requested Non-Wage Costs (\$)	Currently Approved Non-Wage Costs (\$)	Changes to Non-Wage Costs (\$)
784.11	4,000	4,500	- 500
784.12	500	600	- 100
784.13	20,000	22,500	- 2,500
784.14	100,000	112,500	- 12,500
784.15	800	900	- 100
784.16	6,800	7,560	- 760
784.17	550	550	0
784.18	800	900	- 100
784.19	15,000	17,000	- 2,000
784.20	20,000	22,500	- 2,500
784.21	8,000	9,000	- 1,000
784.22	200,000	225,000	- 25,000
784.23	4,000	4,500	- 500
784.24	2,000	2,250	-250
784.25	1,900	2,100	- 200
784.29	2,000	2,250	- 250
784.30	4,000	4,500	- 500
TOTALS	0	0	0

- 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.**

Wage costs for OSMRE employees are calculated based on the Office of Personnel Management website, [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/17Tables/html/RUS\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/17Tables/html/RUS_h.aspx). Salaries for Federal employees below include a benefits rate of 1.6

of salaries per the BLS news release USDL-17-1222. Assuming a GS-12/5 regulatory program specialist/mining engineer reviews the application and conducts reviews, it will cost the Federal government \$62.70 per hour including benefits.

Oversight: In keeping with the current guidance concerning oversight of State program implementation, which de-emphasizes process reviews, OSMRE does not anticipate conducting any significant oversight review of State compliance with the requirements of 30 CFR § 784 in the absence of any indication of programmatic problems. However, if we conduct an oversight review in one state the costs the annual cost to OSMRE is calculated in the following table.

Federal Programs: OSMRE estimates that it will annually receive 1 application for a new underground mine permit for lands and operations for which OSMRE is the regulatory authority. The cost to review and process the application is calculated in the following table.

SUMMARY OF FEDERAL WAGE COSTS FOR 30 CFR PART 784

Section	Oversight Costs (\$)	Federal Programs (\$)	Total Costs (\$)
784.11	2,508	188	2,696
784.12	1,254	188	1,442
784.13	3,762	1,505	5,267
784.14	5,016	1,003	6,019
784.15	752	125	877
784.16	3,762	752	4,514
784.17	188	188	376
784.18	502	125	627
784.19	2,508	752	3,260
784.20	1,505	502	2,007
784.21	752	502	1,254
784.22	752	502	1,254
784.23	3,762	502	4,264
784.24	2,257	502	2,759
784.25	251	251	502
784.29	1,505	502	2,007
784.30	752	125	877
TOTALS	0	0	0

The total Federal cost for 30 CFR part 784 is \$40,002.

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

The currently approved burden for part 784 is 14,906 hours. We are now requesting 21,612 burden hours, an increase of 6,706 hours due to the inclusion of significant revisions in our respondent count. Also, based on discussions with industry identified in item 8, OSMRE is reestimating the burden per respondent to complete the information collection.

14,906	hours currently approved by OMB
+ 6,706	hours due to adjustments
21,612	hours requested

We are seeking a decrease in non-wage cost burden of \$48,760, for a new total of \$390,350 as a result of adjustments in the number of responses.

**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.**

OSMRE has no plans to publish the information collected.

**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.**

OSMRE is not seeking a waiver from the requirement to display the expiration date of the OMB approval of the information collection.

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

There are no exceptions to the certification statement, "Certification for Paperwork Reduction Act Submissions."