

Company Name: Consolidated		Contact Information:				
Type of Question	Question	Labor Hours associated with "Usual and Customary" business practices	Additional Labor Hours due to BSEE requirements	Recent Costs associated with "Usual and Customary" business practices	Additional Costs due to BSEE requirements	30 CFR 250 (Subpart S) Reference
SEMS Design, Implementation and Maintenance	How many labor hours per year does your organization spend creating and updating the policies and procedures that comprise your company's Safety and Environmental Management System (SEMS)?					1900-1933
	How many labor hours per year does your organization spend conducting, signing, and ensuring adherence to Job Safety Analyses (JSA)?					1911(b)
	How many labor hours per year does your organization spend maintaining data for and submitting the BSEE-0131 Form (Performance Measures), maintaining a contractor employee injury/illness log in the operation area (and retaining it for two years), and making this information available to BSEE upon request?					1914(e); 1928(d),(e); 1929
	What is the estimated cost to your organization of a comprehensive SEMS audit conducted by an accredited audit service provider (ASP)?					1920(a), (b); 1925
	How many labor hours per year does your organization spend to develop and submit your audit plan to BSEE?					1920 (b)
	How many labor hours per year does your organization spend to develop and submit your audit report to BSEE?					1920(c); 1925(e)
	How many labor hours per year does your organization spend to provide BSEE information it requests during the ASP-conducted SEMS audit					1920
	How many labor hours per year does your organization spend to develop and submit your corrective action plan to BSEE?					1920(d); 1925(b)
	How many labor hours per year does your organization spend to provide BSEE with information to verify that you undertook the corrective actions and that they effectively addressed the audit findings?					1920(e)
	How many labor hours per year does your organization spend making your SEMS documentation available to BSEE in response to inspection findings (BSEE or USCG) or an incident?					1924
How many labor hours per year does your organization spend making your SEMS documentation available to BSEE for BSEE review not associated with an audit, inspection finding or incident?					1924	
How many labor hours per year does your organization spend maintaining documentation per the following requirements:	Retaining SEMS audit documents for six years at an onshore location?					1928(a)
	JSA documentation?					1928(b)
	MOC records?					1928(c)
	SWA documentation?					1928(f)
	Employee participation plan documentation?					1928(g)
	Maintaining records in an orderly manner, readily identifiable, retrievable and legible with dates of any and all revisions					1928(h)
SEMS Implementation (cont.)	How many labor hours per year does your organization spend documenting decisions to resume SWA activities?					1930(c)
	How many labor hours per year does your organization spend on personnel reports of unsafe practices and/or health violations?					1933(a)
	How many labor hours per year does your organization spend posting notice for personnel that displays their rights for reporting unsafe practices?					1933(c)
Please provide an estimate of the percent of time spent on SEMS data collection / documentation during the course of the year by a typical person in each of these positions:	Position	Percent of work hours spent on SEMS documentation				
	HSE Engineer	59%				
	Production Engineer	17%				
	Computer or Information Tech	24%				
	Technician/Specialist/Support Staff	54%				
	Supervisor/Superintendent/Lead	22%				
	Operations Manager	6%				

Citation	Reporting and Recordkeeping Requirement	Avg. Hour Burden	Average No. of Annual Responses	Annual Burden Hours (rounded)		
						23120
1900-1933	17011 in their entirety,	11,926	8	95,408	1,477,349 row 5	
1900-1933	according to API RP 75, the three COS	4195	22	92,290	340 row 5	
1900-1933	according to API RP 75, the three COS	371	34	12,614	row 5	
1911(b)	designated as being in charge of	9,431	64	603,552		
1924(c), 1928(d), 1929	years, and make	1151	64	73,632	39270	
1920(a), (b); 1921	for High Activity ASP audit for Moderate Activity Operator	8 operators x \$400,000 audit = \$3,200,000 / 3 = \$1,066,667				1685224
	for Low Activity	22 operators x \$135,000 audit = \$2,970,000 / 3 = \$990,000			\$ 1,066,667	400,000
	is done	34 operators x \$54,167 audit = \$1,841,678 / 3 = \$613,889			\$ 990,000	135,000
					\$ 613,889	54,167
1920(b)	plan/schedule 30 days	385	21	8,075		
1920(c); 1925(a);	conclusion s,	112	21	2,342		
1920	requests during the	39	21	827		
1920(d); 1925(b);	address deficiencies identified in audit	137	21 operators	2,872		
1920(e)	the corrective	131	21	2,756		
1922(a)	meeting ISO 17011 (or	420	1 AB	420	1160	
1922(b)	request, AB activity details and	234	1 AB	234	1500	
1924(b)	evaluation documenta	941	64	60,216		
1924	tion in response to	1,818	64	116,344		

1925(a);	\$100,000); 2 required audits for moderate	3 BSEE directed ASP audits – for a total of \$589,167		\$ 589,167
1928	audits for 6 years (at documente d, dated,	300	64	19,208
	document d, dated,	5903	64	377,816
1930(c)	document decision to resume SWA reports	64	64	4104
1933(a)	unsafe practices and/or performance	Burden covered under 30 CFR 250, Subpart A 1014-0022.		0
1933(c)	can view their rights for	73	64	4640
TOTAL SUBPART S		750	1,477,349	
		Responses	Hours	
		\$	3,259,723	

large	\$	400,000
200000 medium	\$	135,000
95000 small	\$	54,167
28167	\$	589,167
<hr/>		
323167		

Internal Calculations

Totals:

8	1,477,349	burdon hours	(760,815)
22	\$ 3,259,723	non-hour cost burden	\$ 1,960,277
34	750	responses	
64	-		
64	1,960,277		

Average Respondent Cost Table

Position	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.4* x \$/hour)	Percent of time spent on collection	Weighted Average (\$/hour/rounded)
HSE Engineer	\$80	\$113	59%	\$66
Production Engineer	\$78	\$109	17%	\$19
Computer or Information Technican	\$75	\$105	24%	\$25
Specialist/Supervisor	\$62	\$87	54%	\$47
Superintendent/	\$107	\$150	27%	\$40
Operations Manager	\$135	\$189	6%	\$11
Weighted Average (\$/hour)				\$209

308,765,915

Average Government Cost Table

Position	Grade	(\$/hour	g	time spent
Clerical	GS-7/5	\$22	\$33	15%

Engineer/Geolog	GS-12/5	\$45	\$68	75%
Engineer/Geolog	GS-14/5	\$63	\$95	25%
Regulatory/ Program Analyst	GS-12/5	\$40	\$60	35%
Weighted Average (\$/hour)				



22.42

225

416

400

730

7190

12

214

17

Stan sees a salary for this position of \$280,420, cannot find that, but used 280,420 / 2080

d
Average
\$5

\$51
\$24
\$21
\$100

Final table in Word document: hours associated with submittals or making info available to BSEE upon

Citation	Requirement	Industry's Burden Hour
§§ 250.1900-1933	High, Moderate, and Low Activity Operator – Maintain SEMS, make available to BSEE upon request.	200,312
§§ 250.1900(b); 1914(d); 1928(d), (e); 1929	Submit Form BSEE-0131.	73,632
§ 250.1920	Notification of audit schedule.	8,075
§§ 250.1920(c); 1925(a), (c);	Submit audit reports.	2,342
§§ 250.1920(d), 1925(c)	Submit/resubmit CAP.	5,628
§ 250.1922	Submit documentation and relevant info about ASP.	420
§ 250.1922	Make available to BSEE upon request, conflict of interest procedures.	234
§ 250.1924(b)	Upon request make available evaluation documentation and supporting info about SEMS.	60,216
§ 250.1924	Provide SEMS information per BSEE requests in response to INCs or an incident.	116,344
§ 250.1928	Documentation/recordkeeping	397,024
Total		864,226

Stan's comments:

2700 hours of inspector time looking at JSA's and 1/production and drilling / well work inspection (da
2/Assumes 65 submittals and 2 hours per company for (

This line deals with receipt and handling of Audit
3/16 hours to review and comment on it, plus 50 hour
4/Assumes 25 reports per year, and 20 hours per repo
5/Assumes 300 hours per year reviewing 30 Corrective
6/Assumes 15 random reviews /yr of different company
7/Assume 40 hours per incident to review SEMS relate

request.	Internal Calculations				Stan's Gov hours
Government's Burden Hour					
5,000	200,312	95,408	92,290	12,614	5,000 1/
130	73,632				130 2/
450	8,075				450 3/
500	2,342				500 4/
900	5,628	2,872	2,756		900 5/
6	420	420			6
1	234				1
125	60,216				125 6/
1,000	1,818				1,000 7/
3,500	397,024	19,208	377,816		3,500
11,612	749,700				11,612
	(189,646)				1,163,522
	2,078,700				
	1161200				

Mechanical Integrity records, which would be 1 hour per
 ta on # inspections from inspections group for 2017)
 Gabe to handle it

Plans, assuming 25 plans received per year on average and
 s to chase down late submittals
 rt for BSEE to review it, request changes, accept report, and extrac
 Action Plan submittals, and 600 hours per year verifying the CAP
 's SEMS information at 8 hours per review
 d documentation, with 25 incidents per year receiving this level of

st data for analysis

review