

Supporting Statement A

Measurement of Oil (43 CFR Subpart 3174)

OMB Control Number 1004-0209

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 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.**

The Bureau of Land Management (BLM) seeks to renew control number 1004-0209, which pertains to the measurement of oil produced from Federal and Indian (except Osage Tribe) leases.

The following authorities allow this collection of information:

- Allotted Mineral Leasing Act, 25 U.S.C. 396;
- Indian Mineral Leasing Act, 25 U.S.C. 396a et seq.;
- Indian Mineral Development Act, 25 U.S.C. 2101 et seq.;
- Mineral Leasing Act, 30 U.S.C. 181 et seq.;
- Mineral Leasing Act for Acquired Lands, 30 U.S.C. 351 et seq.;
- Federal Oil and Gas Royalty Management Act, 30 U.S.C. 1701 et seq.;
- Federal Land Policy and Management Act, 43 U.S.C. 1701 et seq.; and
- 43 CFR Subpart 3174.

- 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.

Some of the activities in this are one-time-only because they apply only to equipment in operation before January 17, 2017 (i.e., the effective date of “Onshore Oil and Gas Operations; Federal and Indian Oil and Gas Leases; Measurement of Oil,” Final Rule, 81 FR 81462 (Nov. 17, 2016)).

For some other activities, there is both an annual burden for some respondents, and a one-time burden for virtually all respondents in the initial implementation. Finally, some of the information collection activities apply only annually.

Request for Exception to Uncertainty Requirements (43 CFR 3174.4(a)(2)) One-Time; and Request for Exception to Uncertainty Requirements (43 CFR 3174.4(a)(2)) Annual

BLM regulations, at 43 CFR 3174.4(a), require each Facility Measurement Point (FMP) that is used for oil measurement to achieve certain overall uncertainty levels. As defined at 43 CFR 3170.3, an FMP is a BLM-approved point at which oil or gas produced from a Federal or Indian lease, unit Participating Area (PA), or Communitized Area (CA) is measured for purposes of determining the production on which royalty is owed.

An operator may seek an exception to the prescribed uncertainty levels by submitting a request for approval by a BLM State Director. The operator must show that meeting the required uncertainty level would involve extraordinary cost or unacceptable adverse environmental effects. The State Director may grant such a request only with written concurrence of the BLM Director.

Documentation of Tank Calibration Table Strapping (43 CFR 3174.5(c)(3)) Annual

Section 3174.5(c)(3) requires submission of tank calibration tables to the BLM within 45 days after calibration. This provision ensures that BLM personnel will have the latest charts when conducting inspections or audits.

Documentation of Testing for Approval of Automatic Tank Gauging (ATG) Equipment (43 CFR 3174.6(b)(5)(ii)(A)) One-Time ; and Log of ATG Verification Annual (43 CFR 3174.6(b)(5)(ii)(C))Annual

The procedures for oil measurement by tank gauging must comply with the requirements outlined in 43 CFR 3174.6. Beginning two years after January 17, 2017, only the specific makes and models of automatic tank gauging (ATG) that are identified and described at <http://www.blm.gov> are approved for use, unless the BLM approves an alternative means of oil measurement under 43 CFR 3174.13.

The “documentation of testing” provision authorizes operators or manufacturers to conduct tests and submit the results in support of a request under section 3174.13.

The “logging” provision requires an operator to inspect its ATG equipment and verify its accuracy to within $\pm 1/4$ inch of a manual gauge at least once a month, or prior to sales, whichever is later. In addition, the BLM may request inspection and verification at any time.

If the operator finds an ATG to be out of tolerance, the operator must calibrate the ATG prior to sales, and must maintain a log of field verifications. That operator must make the log available to the BLM upon request. The log must include the following information

- The date of verification;
- The as-found manual gauge readings;
- The as-found ATG readings; and
- Whether the ATG was field-calibrated.

If the ATG was field-calibrated, the as-left manual gauge readings and as-left ATG readings must be recorded. This information collection activity enables the BLM to ensure the accuracy of tank gauging by ATGs.

Notification of LACT System Failure (43 CFR 3174.7(e)(1)) Annual

Section 3174.7(e)(1) requires the operator to notify the BLM within 72 hours upon discovery of any lease automatic custody transfer (LACT) system failures or equipment malfunctions which may have resulted in measurement error. As defined at section 3174.1, a LACT system consists of components designed to provide for the unattended custody transfer of oil produced from a lease, unit PA, or CA to the transporting carrier while providing a proper and accurate means for determining the net standard volume and quality, and fail-safe and tamper-proof operations. This information collection requirement enables the BLM to verify that operators account for all oil volumes.

Positive Displacement (PD) Meters and Coriolis Meters

Section 3174.8(a)(1) requires each custody transfer meter to be a positive displacement (PD) meter or a Coriolis meter. Beginning two years after January 17, 2017, only the specific makes, models, and sizes of PD meters and Coriolis meters and associated software that are identified and described at <http://www.blm.gov> are approved for use. The following information-collection provisions authorize operators or manufacturers to conduct tests and submit the results in support of a request under section 3174.13:

- a. Documentation of Testing for Approval of a Positive Displacement (PD) Meter (43 CFR 3174.8(a)(1)) One-Time;***
- b. Documentation of Testing for Approval of a Positive Displacement (PD) Meter (43 CFR 3174.8(a)(1)) Annual;***
- c. Documentation of Testing for Approval of a Coriolis Meter (43 CFR 3174.9(b)) One-Time; and***

**d. Documentation of Testing for Approval of a Coriolis Meter (43 CFR 3174.9(b))
Annual**

**Documentation of Coriolis Meter Specifications and Zero Verification Procedure (43 CFR 3174.10(b)(2) and (d) Annual);
Zero Verification Log (43 CFR 3174.10(b)(2) and (e)(4)) Annual; and
Audit Trail Requirements for Coriolis Measurement System (CMS) (43 CFR 3174.10(b)(2) and (f)) Annual**

Section 3174.10(b)(2) requires the operator to submit Coriolis meter specifications to the BLM upon request. The meter specifications of a Coriolis meter must clearly identify the make and model of the Coriolis meter to which they apply and must include the following:

- The reference accuracy for both mass flow rate and density, stated in either percent of reading, percent of full scale, or units of measure;
- The effect of changes in temperature and pressure on both mass flow and fluid density readings;
- The stability of the zero reading for volumetric flow rate;
- Design limits for flow rate and pressure; and
- Pressure drop through the meter as a function of flow rate and fluid viscosity.

Section 3174.10(d) requires the operator to provide the BLM with a copy of the zero value verification procedure upon request.

Section 3174.10(e)(4) requires the operator to maintain a log of all meter factors, zero verifications, and zero adjustments. For zero adjustments, the log must include the zero value before adjustment and the zero value after adjustment. The log must be made available to the BLM upon request.

Section 3174.10(f) requires the operator to record and retain, and submit to the BLM upon request, the following information:

- Quantity transaction record (QTR) in accordance with the requirements for a measurement ticket (at 43 CFR 3174.12(b));
- Configuration log that contains and identifies all constant flow parameters used in generating the QTR;
- Event log of sufficient capacity to record all events such that the operator can retain the information under the recordkeeping requirements of 43 CFR 3170.7; and
- Alarm log that records the type and duration of any of the following alarm conditions:
 - Density deviations from acceptable parameters; and
 - Instances in which the flow rate exceeded the manufacturer's maximum recommended flow rate or were below the manufacturer's minimum recommended flow rate.

These information collection activities assist the BLM in ensuring real-time, on-line measurement of oil.

Onsite Display Requirements (43 CFR 3174.10(e)) Annual

Section 3174.10(e) requires a Coriolis meter to display the following specified values and corresponding units without using data collection units, laptop computers, or any special equipment:

- The instantaneous density of liquid;
- The instantaneous indicated volumetric flow rate through the meter;
- The meter factor;
- The instantaneous pressure;
- The instantaneous temperature;
- The cumulative gross standard volume through the meter; and
- The previous day's gross standard volume through the meter.

This information collection activity assists the BLM in using a Coriolis meter onsite to verify amounts of oil produced.

Meter Prover Calibration Documentation (43 CFR 3174.11(b)) Annual

Section 3174.11 (b) requires that the meter prover used to determine the meter factor has a valid certificate of calibration available for review by the BLM on site. The certificate must show that the prover, identified by serial number assigned to and inscribed on the prover, was calibrated in accordance with the standards listed at section 3174.11.

Meter Proving and Volume Adjustments Notification (43 CFR 3174.11(i)(1)) Annual; and Meter Proving Reports (43 CFR 3174.11(i)(3)) Annual

Section 3174.11 specifies the minimum requirements for conducting volumetric meter proving for all facility measurement point (FMP) meters. Meter proving verifies the accuracy of a meter.

Under 43 CFR 3174.11(i)(1), an operator must report to the BLM all meter-proving and volume adjustments after any LACT system or CMS malfunction. The operator must use the appropriate form in API 12.2.3 or API 5.6 (both incorporated by reference at 43 CFR 3174.3), or use a similar format showing the same information as the API form, provided that the calculation of meter factors maintains the proper calculation sequence and rounding.

A meter-proving report must show the:

- Unique meter ID number;
- Lease number, CA number, or unit PA number;

- The temperature from the test thermometer and the temperature from the temperature averager or temperature transducer;
- For pressure transducers, the pressure applied by the pressure test device and the pressure reading from the pressure transducer at the three points required under paragraph (g)(3) of this section;
- For density verification (if applicable), the instantaneous flowing density (as determined by Coriolis meter), and the independent density measurement, as compared under 43 CFR 3174.(h); and
- The “as left” fluid flow rate and fluid pressure, if the back-pressure valve is adjusted after proving as described in 43 CFR 3174.11(c)(9).

Under section 3174.11(i)(3), the operator must submit the meter-proving report to the BLM no later than 14 days after the meter proving. The proving report may be either in a hard copy or electronic format. This information collection activity assists the BLM in verifying the accuracy of volumetric meter proving.

***Tank Gauging Run Tickets (43 CFR 3174.12(a)); and
LACT or CMS Run Tickets (43 CFR 3174.12(b))***

A run ticket is the evidence of receipt or delivery of oil issued by a pipeline, other carrier, or purchaser. The amount of oil transferred from storage is recorded on a run ticket. The amount of payment for oil is based upon information contained in the run ticket. Both of these information-collection activities are authorized by control number 1004-0137, and need no further analysis in this request.

***Request to Use Alternative Oil Measurement System (43 CFR 3174.13) One-Time; and
Request to Use Alternate Oil Measurement System (43 CFR 3174.13) Annual***

In recognition that new measurement technologies and processes will continue to be developed and evolve, the BLM has created a Production Measurement Team (PMT) to provide expert review of new measurement technologies, and to determine if such technologies are reliable and accurate. Once a technology has been approved by the BLM based on the PMT’s review, that technology may be employed at additional facilities or by additional operators without a subsequent BLM approval, so long as those facilities and operators follow all conditions of approval established by the PMT.

The PMT will review and make recommendations in response to requests to use alternate oil measurement equipment. This information collection activity enables the BLM to consider approving new technologies not yet addressed in its regulations.

Section 3174.13 requires prior BLM approval for any method of oil measurement other than tank gauging, LACT system, or CMS at an FMP. Any operator requesting approval to use alternate oil measurement equipment must submit to the BLM:

- Performance data;
- Actual field test results;
- Laboratory test data; or
- Any other supporting data or evidence that demonstrates that the proposed alternate oil measurement equipment would meet or exceed the objectives of the applicable minimum requirements at 43 CFR subpart 3174 and would not affect royalty income or production accountability.

The specific burdens of documenting testing in support of requests for approval of alternative oil measurement systems are disclosed under the following headings:

- **Documentation of Testing for Approval of Automatic Tank Gauging (ATG) Equipment (43 CFR 3174.6(b)(5)(ii)(A)) One-Time ;**
- **Documentation of Testing for Approval of Automatic Tank Gauging (ATG) Equipment (43 CFR 3174.6(b)(5)(ii)(A)) Annual;**
- **Documentation of Testing for Approval of a Positive Displacement (PD) Meter (43 CFR 3174.8(a)(1)) One-Time;**
- **Documentation of Testing for Approval of a Positive Displacement (PD) Meter (43 CFR 3174.8(a)(1)) Annual;**
- **Documentation of Testing for Approval of a Coriolis Meter (43 CFR 3174.9(b)) One-Time; and**
- **Documentation of Testing for Approval of a Coriolis Meter (43 CFR 3174.9(b)) Annual**

Approval for Slop or Waste Oil (43 CFR 3174.14) Annual

When production cannot be measured due to spillage or leakage, the amount of production must be determined by using any method the BLM approves or prescribes. This category of production includes, but is not limited to, oil that is classified as slop oil or waste oil.

No oil may be classified or disposed of as waste oil unless the operator can demonstrate to the satisfaction of the BLM that it is not economically feasible to put the oil into marketable condition.

The operator may not sell or otherwise dispose of slop oil without prior written approval from the BLM. Following the sale or disposal of slop oil, the operator must notify the BLM in writing of the volume sold or disposed of and the method used to compute the volume. This information collection activity enables the BLM to determine whether or not to approve the sale or disposal of slop or waste oil.

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.

Section 3174.5(c)(3) allows the submission of tank tables in paper or electronic format.

Section 3174.11(i)(3) allows the submission of proving reports in hard copy or electronic format.

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.

No duplication of information occurs in the information to be collected. The information is unique to each respondent and lease and is not available from any other data source. No similar information is available or able to be modified.

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

A preponderance of firms involved in developing oil and gas resources are small entities as defined by the Small Business Administration. All respondents, regardless of size, are required to comply with the proposed information collection requirements. The information we require from all respondents is limited to the minimum necessary to ensure accurate oil measurement.

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 we did not collect the information, or collected it less frequently, oil and gas leasing activities and operations could not occur on Federal or Indian trust leases in compliance with pertinent statutes.

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.**

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5.

- 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.

On October 18, 2019 the BLM published the required 60-day notice in the Federal Register (84 FR 55980), and the comment period ended on December 17, 2019. The BLM received no comments.

The BLM has consulted with the following respondents to obtain their views on the availability of data; frequency of collection; the clarity of instructions; the recordkeeping, disclosure, and reporting formats; and on the data elements to be recorded, disclosed, or reported:

Regulatory Manager
XTO Energy
Spring, TX

Senior Manager, Measurement
WPX Energy
Tulsa, OK

Measurement Manager
Extraction Oil & Gas
Denver, CO

The burden estimates were not adjusted as a result of these consultations.

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

We do not provide payments or gifts to the respondents.

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

The regulations provide no assurance of confidentiality to respondents.

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.

We do not require respondents to answer questions of a sensitive nature.

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.

The BLM estimates the following annual burdens for respondents:

- 11,742 responses;
- 5,884 hours; and
- A dollar equivalent of \$387,990.

Table 12-1, below, shows the BLM’s estimate of the hourly cost burdens for respondents. The mean hourly wages were determined using national Bureau of Labor Statistics data at http://www.bls.gov/oes/current/oes_nat.htm.

The benefits multiplier of 1.4 is supported by information at <http://www.bls.gov/news.release/ecec.nr0.htm>.

**Table 12-1
Estimated Weighted Average Hourly Costs**

A. Position and Occupation Code	B. Mean Hourly Pay Rate	C. Hourly Rate with Benefits (Column B x 1.4)	D. Percent of Collection Time Completed by Each Occupation	E. Weighted Average Hourly Costs (Column C x Column D)
General Office Clerk (43-9061)	\$16.92	\$23.69	10%	\$2.37
Engineer (17-2199)	\$47.80	\$66.92	80%	\$53.54
Engineering Manager (11-9041)	\$71.62	\$100.27	10%	\$10.03
Totals	—	—	100%	\$65.94

Table 12-2, below, itemizes the estimated hour and cost burdens for the proposed information collection activities. Hour and cost burdens to respondents include time spent for compiling and preparing information. The weighted average hourly wage associated with these information collection activities is shown at Table 12-1, above. The frequency of response for each of the information collections is “on occasion.”

**Table 12-2
Estimated Hour Burdens**

A. Type of Response	B. Number of Responses	C. Hours Per Response	D. Total Hours	E. Dollar Equivalent (Column D x \$65.94)
Request for Exception to Uncertainty Requirements 43 CFR 3174.4(a)(2) One-Time	5	40	200	\$13,188
Request for Exception to Uncertainty Requirements 43 CFR 3174.4(a)(2) Annual	2	40	80	\$5,275
Documentation of Tank Calibration Table Strapping 43 CFR 3174.5(c)(3) Annual	10,000	.25	2,500	\$164,850
Documentation of Testing for Approval of Automatic Tank Gauging (ATG) Equipment 43 CFR 3174.6(b)(5)(ii)(A) One-Time	5	80	400	\$26,376
Documentation of Testing for Approval of Automatic Tank Gauging (ATG) Equipment 43 CFR 3174.6(b)(5)(ii)(A) Annual	1	80	80	\$5,275
Log of ATG Verification 43 CFR 3174.6(b)(5)(ii)(C) Annual	18	0.1	2	\$131.88
Notification of LACT System Failure 43 CFR 3174.7(e)(1) Annual	100	0.25	25	\$1,648.50
Documentation of Testing for Approval of a Positive Displacement (PD) Meter 43 CFR 3174.8(a)(1) One-Time	10	80	800	\$52,752

A. Type of Response	B. Number of Responses	C. Hours Per Response	D. Total Hours	E. Dollar Equivalent (Column D x \$65.94)
Documentation of Testing for Approval of a Positive Displacement (PD) Meter 43 CFR 3174.8(a)(1) Annual	1	80	80	\$5,275
Documentation of Testing for Approval of a Coriolis Meter 43 CFR 3174.9(b) One Time	10	80	800	\$52,752
Documentation of Testing for Approval of a Coriolis Meter 43 CFR 3174.9(b) Annual	1	80	80	\$5,275
Documentation of Coriolis Meter Specifications and Zero Verification Procedure 43 CFR 3174.10(b)(2) and (d) Annual	100	0.1	10	\$659.40
Zero Verification Log 43 CFR 3174.10(b)(2) and (e)(4) Annual	100	0.1	10	\$659.40
Audit Trail Requirements for Coriolis Measurement System (CMS) 43 CFR 3174.10(b)(2) and (f) Annual	500	0.25	125	\$8,242.50
Onsite Data Display Requirements 43 CFR 3174.10(e) Annual	500	0.1	50	\$3,297.00
Meter Prover Calibration Documentation 43 CFR 3174.11(b) Annual	150	0.5	75	\$4,945.50
Meter Proving and Volume Adjustments Notification 43 CFR 3174.11(i)(1) Annual	60	0.1	6	\$395.64
Meter Proving Reports 43 CFR 3174.11(i)(3) Annual	123	0.25	31	\$2,044.14

A. Type of Response	B. Number of Responses	C. Hours Per Response	D. Total Hours	E. Dollar Equivalent (Column D x \$65.94)
Request to Use Alternate Oil Measurement System 43 CFR 3174.13 One Time	5	80	400	\$26,376
Request to Use Alternate Oil Measurement System 43 CFR 3174.13 Annual	1	80	80	\$5,275
Approval for Slop or Waste Oil 43 CFR 3174.14 Annual	50	1	50	\$3,297.00
Totals	11,742	—	5,884	\$387,990

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.

The BLM estimates \$5,580,305 in non-hour costs for gathering of information. Testing, calibration, verification, and meter proving activities are involved. No filing fees are associated with this information collection.

The costs are itemized below in Table 13.

**Table 13
Estimates of Non-Hour Cost Burdens**

A. Type of Response	B. Description of Non-Hour Cost Burden	C. Number of Actions	D. Cost per Action	E. Total Cost
Documentation of Tank Calibration Table Strapping 43 CFR 3174.5(c)(3) Annual	Strapping of 10,000 tanks to acquire tank measurements for calculating tank calibration tables (\$400 per tank)	10,000	\$400	\$4,000,000
Documentation of Testing for Approval of Automatic Tank Gauging (ATG) Equipment 43 CFR 3174.6(b)(5)(ii)(A) One-Time	Testing of 5 ATG equipment makes and models at a qualified test facility (\$40,000 per test)	5	\$40,000	\$200,000
Documentation of Testing for Approval of Automatic Tank Gauging (ATG) Equipment 43 CFR 3174.6(b)(5)(ii)(A) Annual	Testing of 1 ATG equipment make and model at a qualified test facility (\$40,000 per test)	1	\$40,000	\$40,000
Log of ATG Verification 43 CFR 3174.6(b)(5)(ii)(C) Annual	Perform 18 ATG verification procedures	18	\$22.50	\$405
Documentation of Testing for Approval of a Positive Displacement (PD) Meter 43 CFR 3174.8(a)(1) One-Time	Testing of 10 Positive Displacement (PD) Meter makes and models at a qualified test facility (\$40,000 per test)	10	\$40,000	\$400,000

A. Type of Response	B. Description of Non-Hour Cost Burden	C. Number of Actions	D. Cost per Action	E. Total Cost
Documentation of Testing for Approval of a Positive Displacement (PD) Meter 43 CFR 3174.8(a)(1) Annual	Testing of 1 Positive Displacement (PD) Meter make and model at a qualified test facility (\$40,000 per test)	1	\$40,000	\$40,000
Documentation of Testing for Approval of a Coriolis Meter 43 CFR 3174.9(b) One Time	Testing of 10 Coriolis Meter makes and models at a qualified test facility (\$40,000 per test)	10	\$40,000	\$400,000
Documentation of Testing for Approval of a Coriolis Meter 43 CFR 3174.9(b) Annual	Testing of 1 Coriolis Meter make and model at a qualified test facility (\$40,000 per test)	1	\$40,000	\$40,000
Documentation of Coriolis Meter Specifications and Zero Verification Procedure 43 CFR 3174.10(b)(2) and (d) Annual	Perform 100 zero verification procedures	100	\$22.50	\$2,250
Meter Prover Calibration Documentation 43 CFR 3174.11(b) Annual	Perform 150 calibrations of meter prover (\$1000 per calibration)	150	\$1,000	\$150,000
Meter Proving Reports 43 CFR 3174.11(i)(3) Annual	Perform 123 meter proving operations (\$550 per proving)	123	\$550	\$67,650
Testing of Alternate Oil Measurement System 43 CFR 3174.13 One Time	Testing of 5 alternative measurement system make and model at a qualified test facility (\$40,000 per test)	5	\$40,000	\$200,000
Testing of Alternate Oil Measurement System 43 CFR 3174.13 Annual	Testing of 1 alternative measurement system make and model at a qualified test facility (\$40,000 per test)	1	\$40,000	\$40,000
Total Cost	—	—	—	\$5,580,305.00

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The estimated annual Federal burden is:

- 11,742 responses;
- 11,096 hours; and
- A dollar equivalent of \$602,068.96.

Table 14-1 shows the BLM’s estimate of the hourly cost burdens to the Federal government. The hourly pay rates (Column B) are based on U.S. Office of Personnel Management data at: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/RUS_h.pdf.

The benefits multiplier of 1.6 is implied by information at <http://www.bls.gov/news.release/ecec.nr0.htm>.

**Table 14-1
Weighted Average Hourly Cost Calculation**

A. Position	B. Mean Hourly Pay Rate	C. Hourly Rate with Benefits (Column B x 1.6)	D. Percent of Collection Time	E. Weighted Average Hourly Cost (Column C x Column D)
General Office Clerk GS-6, step 5	\$20.55	\$32.88	10%	\$3.29
Professional GS-11, step 5	\$33.80	\$54.08	80%	\$43.26
Managerial GS-13, step 5	\$48.17	\$77.07	10%	\$7.71
Totals	—	—	100%	\$54.26

The benefits multiplier of 1.6 is implied by information at: <http://www.bls.gov/news.release/ecec.nr0.htm>.

Table 14-2, below, shows the estimated Federal hours and costs for each component of this information collection.

**Table 14-2
Estimated Federal Hour Burdens**

A. Type of Response	B. Number of Responses	C. Hours Per Response	D. Total Hours	E. Dollar Equivalent (Column D x \$54.26)
Request for Exception to Uncertainty Requirements 43 CFR 3174.4(a)(2) One-Time	5	40	200	\$10,852.00
Request for Exception to Uncertainty Requirements 43 CFR 3174.4(a)(2) Annual	2	40	80	\$4,340.80
Documentation of Tank Calibration Table Strapping 43 CFR 3174.5(c)(3) Annual	10,000	0.5	5,000	\$271,300.00
Documentation of Testing for Approval of Automatic Tank Gauging (ATG) Equipment 43 CFR 3174.6(b)(5)(ii)(A) One-Time	5	120	600	\$32,556.00
Documentation of Testing for Approval of Automatic Tank Gauging (ATG) Equipment 43 CFR 3174.6(b)(5)(ii)(A) Annual	1	120	120	\$6,511.20
Log of ATG Verification 43 CFR 3174.6(b)(5)(ii)(C) Annual	18	1	18	\$976.68
Notification of LACT System Failure 43 CFR 3174.7(e)(1) Annual	100	1	100	\$5,426.00

A. Type of Response	B. Number of Responses	C. Hours Per Response	D. Total Hours	E. Dollar Equivalent (Column D x \$54.26)
Documentation of Testing for Approval of a Positive Displacement (PD) Meter 43 CFR 3174.8(a)(1) One-Time	10	120	1200	\$65,112.00
Documentation of Testing for Approval of a Positive Displacement (PD) Meter 43 CFR 3174.8(a)(1) Annual	1	120	120	\$6,511.20
Documentation of Testing for Approval of a Coriolis Meter 43 CFR 3174.9(b) One Time	10	120	1200	\$65,112.00
Documentation of Testing for Approval of a Coriolis Meter 43 CFR 3174.9(b) Annual	1	120	120	\$6,511.20
Documentation of Coriolis Meter Specifications and Zero Verification Procedure 43 CFR 3174.10(b)(2) and (d) Annual	100	1	100	\$5,426.00
Zero Verification Log 43 CFR 3174.10(b)(2) and (e)(4) Annual	100	1	100	\$5,426.00
Audit Trail Requirements for Coriolis Measurement System (CMS) 43 CFR 3174.10(b)(2) and (f) Annual	500	1	500	\$27,130.00
Onsite Data Display Requirements 43 CFR 3174.10(e) Annual	500	1	500	\$27,130.00
Meter Prover Calibration Documentation 43 CFR 3174.11(b) Annual	150	0.5	75	\$4,069.50

A. Type of Response	B. Number of Responses	C. Hours Per Response	D. Total Hours	E. Dollar Equivalent (Column D x \$54.26)
Meter Proving and Volume Adjustments Notification 43 CFR 3174.11(i)(1) Annual	60	2	120	\$6,511.20
Meter Proving Reports 43 CFR 3174.11(i)(3) Annual	123	1	123	\$6,673.98
Request to Use Alternate Oil Measurement System 43 CFR 3174.13 One Time	5	120	600	\$32,556.00
Request to Use Alternate Oil Measurement System 43 CFR 3174.13 Annual	1	120	120	\$6,511.20
Approval for Slop or Waste Oil 43 CFR 3174.14 Annual	50	2	100	\$5,426.00
Totals	11,742	—	11,096	\$602,068.96

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

There are no adjustments or program changes.

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.

The BLM will not publish the results of this collection.

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.

The BLM will display the expiration date of the OMB approval.

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.