

Supporting Statement A
30 CFR 250, Subpart D, Oil and Gas Drilling Operations
Forms BSEE-0125, -0133, and -0133S
OMB Control Number 1014-0018
Current Expiration Date: March 31, 2021

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 at 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 the 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.

In addition to the general rulemaking authority of the OCS Lands Act at 43 U.S.C. 1334, 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 the Bureau of Safety and Environmental Enforcement (BSEE), 30 U.S.C. 1751 is included as additional authority for these requirements.

The Federal Water Pollution Control Act (33 U.S.C. 1321(j)(1)(C)) authorizes the President to adopt regulations that establish procedures, methods and equipment requirements to prevent oil spills and other hazardous substance discharges from offshore and other facilities. The regulatory authority for offshore facilities has been delegated to the Secretary and further delegated by the Secretary to BSEE. The regulations at 30 CFR Part 250, Subpart D, require compliance with all applicable BSEE regulations, including those intended to prevent or reduce discharges of oil and other hazardous substances.

These authorities and responsibilities are among those delegated to BSEE.

The regulations at 30 CFR 250, subpart D, concern oil and gas drilling operations and are the subject of this collection. This request also covers any related Notices to Lessees and Operators (NTLs) that BSEE issues to clarify, supplement, or provide additional guidance on some aspects of our regulations.

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.

The BSEE uses the information to ensure safe drilling operations and to protect the human, marine, and coastal environment. Among other things, BSEE specifically uses the information to ensure: the drilling unit is fit for the intended purpose; the lessee or operator will not encounter geologic conditions that present a hazard to operations; equipment is maintained in a state of readiness and meets safety standards; each drilling crew is properly trained and able to promptly perform well-control activities at any time during well operations; compliance with safety standards; and the current regulations will provide for safe and proper field or reservoir development, resource evaluation, conservation, protection of correlative rights, safety, and environmental protection. We also review well records to ascertain whether drilling operations have encountered hydrocarbons or H₂S and to ensure that H₂S detection equipment, personnel protective equipment, and training of the crew are adequate for safe operations in zones known to contain H₂S and zones where the presence of H₂S is unknown.

This ICR includes four forms. The forms use and information consist of the following:

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 the form:

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

Well at Total Depth - ascertain the lease No., area name, block No., 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 (Casing & Obstruction) - 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

The 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). The engineer 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.

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.

BSEE-0133S

General Information - Identifies the well number/ name, operator name, sidetrack/bypass number, and contact name/telephone/email.

Open Hole Tools, Mud Logs, 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.

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.

The 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 forms electronically using a secure web application in lieu of submitting paper forms. At present, an estimated 95 percent of submittals pertaining to this collection are being 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 information collected is unique to a specific drilling/well operation and does not duplicate any other available information; similar information is not readily available or discernible from other sources. The Department of the Interior and other government agencies have Memoranda of Understanding which define the responsibilities of their agencies with respect to activities in the OCS. These are effective in avoiding duplication of regulations and reporting requirements.

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 substantial number of small entities. Any direct effects primarily impact the OCS lessees and operators. However, many of the OCS lessees and operators have less than 500 employees and are considered small businesses as defined by the Small Business Administration. Regulations require safe work practices and protection of the environmental resources; also because of the factors involved when drilling for oil or gas, the hour burden on any small entity subject to these regulations 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 operations and the protection of the environment and resources. The information is necessary to carry out the mandate of the OCS Lands Act. 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 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.

Forms BSEE-0125, -0133, and -0133S: If this information were not available, BSEE could not review the status of the well after operations have concluded to determine that acceptable levels of safety and environmental protection have been maintained. Nor could we review information concerning requests for approval or subsequent reporting of well-completion, well-workover, and well-abandonment operations to determine that procedures and equipment are appropriate for the anticipated conditions.

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;

Respondents are required to submit daily well activity reports in the Pacific and Alaska OCS Regions to timely monitor drilling and well activities. Due to the volume of activity in the GOMR, respondents submit the information on Forms BSEE-0133 and -0133S on a weekly basis.

(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 Form BSEE-0125, End of Operations Report (EOR): 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 are required to maintain records pertaining to testing, inspection, and maintenance of source control and containment equipment (SCCE) for at least 10 years; as well as records pertaining to the use of SCCE during testing, training, and deployment activities for at least 3 years.

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; undoubtedly this could be longer than 3 years. 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

Not applicable in this collection.

(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.

BSEE will protect any confidential commercial or proprietary information according to the Freedom of Information Act (5 U.S.C. 552) and DOI's implementing regulations (43 CFR 2); section 26 of OCSLA (43 U.S.C. 1352); 30 CFR 250.197, *Data and information to be made available to the public or for limited inspection*; and 30 CFR part 252, *OCS Oil and Gas Information Program*.

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 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 a 60-day review and comment process through the preamble of the proposed rulemaking, dated May 11, 2018 (83 FR 22128). In addition, 30 CFR 250.199 explains that BSEE will accept comments at any time on the information collected and the burden. We display the OMB control number and provide the address for sending comments to BSEE. We received five comments pertaining to IC in response to the proposed rule from respondents covered under these regulations. Please see the Section-By-Section Summary and Responses to Comments on the Proposed Rule in the Final Rule.

Comments pertaining to the IC in the proposed rule were received by:

Cook Inlet Regional Citizens Advisory Council
W&T Offshore, Inc.
Coalition to Protect America's National Parks
NRDC
Murphy Exploration and Production Co.

Changes from Proposed rule to Final rule:

Based on comments received, BSEE is revising § 250.427(b) to allow an operator to respond to lost circulation events in accordance with API Bulletin 92L and to require notification to the BSEE District Manager documenting the operator's use of API Bulletin 92L. This will increase the annual hour burden by 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 payments 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.

BSEE will protect any confidential commercial or proprietary information according to the Freedom of Information Act (5 U.S.C. 552) and DOI's implementing regulations (43 CFR 2); section 26 of OCSLA (43 U.S.C. 1352); 30 CFR 250.197, *Data and information to be made available to the public or for limited inspection*; and 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.

This collection does not include questions of a sensitive nature.

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 burden.

Potential respondents include Federal OCS oil, gas, and sulfur lessees/operators. It should be noted that not all of the potential respondents will submit information in any given year 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 and reviewing the collection of information and are based on information discussions with the list of respondents in Section A.8. Responses are mandatory; and the frequency of submissions are generally on occasion, daily, weekly, monthly, quarterly, annually, and varies by section. We estimate the total annual reporting and recordkeeping burden is 83,528 hours.

BURDEN TABLE

Citation 30 CFR 250 Subpart D and NTL(s)	Reporting and Recordkeeping Requirement*	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (rounded)
400-490	Apply for use of alternative procedures and/or departures not requested in BSEE forms (including discussions with BSEE or oral approvals).	Burden covered under 1014-0022.		0
404	Perform operational check of crown block safety device; record results (weekly).	0.25	50 drilling rigs x 52 weeks = 2,600 records	650
408-418, 420(a)(7); 423(b)(3), (c); 456(j); plus in subparts A, B, D, E, G, H, P, Q.	Submit Application for Permit to Drill (APD Form BSEE-0123 and BSEE-0123S) that includes any/all supporting documentation and requests for various approvals required in subpart D (including §§ 250.427, 428, 432, 460, 462(c), 470, 490(c)) and submitted via the form; upon request, make available to BSEE.	Burden covered under 1014-0025.		0
410(b);	Reference Well and site-specific information approved in your Exploration Plan, Development and Production Plan, Development Operations Coordination Document in your APD.	Burdens pertaining to EPs, DPPs, DOCs are covered under BOEM 1010-0151 and APDs are covered under 1014-0025.		0
418(e)	Submit welding and burning plan according to 30 CFR 250, subpart A.	Burden covered under 1014-0022.		0
420(b)(3); 423(b)(7); 465(a), (b) (3); plus various ref in A, D, E, F, G, P, and Q	Submit Form BSEE-0125, End of Operations Report (EOR), and additional supporting information as required by the cited regulations; and any additional information required by the District Manager.	3	BSEE-0125 445 submittals	1,335
420(b)(3)	Submit dual mechanical barrier documentation after installation on form BSEE-0125.	1	553 submittals	553
420(b)(3)	Request approval for alternative options to installing barriers.	0.25	82 requests	21
421(b)	Alaska only: Discuss the cement fill level with the District Manager.	1	1 discussion	1
421(f)	Submit and receive approval if unable to cement 500 ft above previous shoe.	Burden covered under 1014-0022		0
423(a)	Request and receive approval from District Manager for repair.	2.5	55 requests	138
423(c)(2)	Document all test results pressure test and make them available to BSEE upon request.	1	310 results	310
427(a)	Record results of all pressure integrity tests and hole behavior observations re-formation integrity and pore pressure.	2	3,775 record results	7,550
427(b)	District Manager must review and approve proposed remedial actions	2	20 approvals	40

Citation 30 CFR 250 Subpart D and NTL(s)	Reporting and Recordkeeping Requirement*	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (rounded)
428(c)(3); 428(k); ref in Subparts A, D, G	In the GOM OCS Region, submit drilling activity reports weekly (District Manager may require more frequent submittals) on Forms BSEE-0133 (Well Activity Report (WAR)) and BSEE-0133S (Bore Hole Data) with supporting documentation.	1	4,160 submittals	4,160
428(c)(3); 428(k); ref in A, D, G	In the Pacific and Alaska Regions during drilling operations, submit daily drilling reports on Forms BSEE-0133 (Well Activity Report (WAR)) and BSEE-0133S (Bore Hole Data) with supporting documentation.	1	407 submittals	407
428(d)	Submit all remedial actions for review and approval by District Manager (before taking action); and any other requirements of the District Manager.	5	1,330 submittals	6,650
428(d)	Submit descriptions of completed immediate actions to District Manager and any other requirements of the District Manager.	5	352 submittals	1,760
428(d)	Submit PE certification of any proposed changes to your well program; and any other requirements of the District Manager.	3	275 submittals	825
428(k)	Maintain daily drilling report (cementing requirements).	0.5	85 reports	43
428(k)	If cement returns are not observed, contact the District Manager to obtain approval before continuing with operations.	1	30 requests	30
434	Record time, date & results of all diverter actuations & tests (average 2 per drilling operation); retain all charts/reports relating to diverter tests/actuations at facility for duration of drilling well.	2	660 records	1,320
452(a), (b)	Gather and monitor real-time data using independent, automatic, & continuous monitoring system capable of recording, storing, and transmitting data relating to the BOP control system, fluid handling, downhole conditions; during well operations, transmit the data onshore. Provide BSEE with access to real-time monitoring data onshore upon request (Arctic only).	4	1 transmittal	4
452(b)	Store and retain all monitoring records per requirements of §§ 250.740 and 250.741.	Burden covered under 1014-0028.		0
456(b), (i)	Document/record in the driller's report every time you circulate drilling fluid; results of drilling fluid tests.	1	4,190 records	4,190
456(c), (f)	Perform various calculations; post calculated drill pipe, collar, and drilling fluid volume; as well as maximum pressures.	1	4,279 postings	4,279
458(b)	Record daily drilling fluid and materials inventory in drilling fluid report.	1	30,695 records	30,695
459(a)(3)	Request exception to procedure for protecting negative pressure area.	Burden included under 1014-0022.		0
460	Submit plans and obtain approval to conduct well test; notify BSEE before test (APD Form BSEE-0123).	Burden covered under 1014-0025.		0

Citation 30 CFR 250 Subpart D and NTL(s)	Reporting and Recordkeeping Requirement*	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (rounded)
460; 465; plus in A, D, E, F, G, H, P, and Q	Provide revised plans and the additional supporting information required by the cited regulations when you submit an Application for Permit to Modify (APM) (Form BSEE-0124) to BSEE for approval; or a Revised APM.	Burden covered under 1014-0026.		0
461(a-b); NTL	Record and submit well logs and surveys run in the wellbore and/or charts of well logging operations (including but not limited to).	2	382 logs/surveys	764
	Record and submit directional and vertical-well surveys.	1	332 reports	332
	Record and submit velocity profiles and surveys.	1	45 reports	45
	Record and submit core analyses.	1	130 analyses	130
461(e)	Provide copy of well directional survey to affected leaseholder.	2	11 occasions	22
462(c)	NEW: Submit a description of source control and containment capabilities and all supporting information for approval.	4.5	150 submittals	675
462(d)	NEW: Request re-evaluation of your source containment capabilities from the District Manager and Regional Supervisor.	1	600 requests	600
462(e)(1)	NEW: Notify BSEE 21 days prior to pressure testing; witness by BSEE and ITP.	1	2 notifications	2
		\$8,000 x 2 notifications = \$16,000		
463(b)	Request field drilling rules be established, amended, or canceled.	5	12 requests	60
465	Obtain approval to revise your drilling plan or change major drilling equipment by submitting a revised BSEE-0124, Application for Permit to Modify and BSEE-0125, End of Operations Report.	Burden covered under 1014-0026 & 1014-0028.		0
470(a); 418	Submit detailed descriptions of environmental, meteorologic, and oceanic conditions expected at well site(s); how drilling unit, equipment, and materials will be prepared for service; how the drilling unit will be in compliance with § 250.713.	11	1 submittal	11
470(b); 418	Submit detailed description of transitioning rig from being underway to drilling and vice versa.	1	2 each well-underway to drilling; drilling to underway = 4	4
470(b); 418	Submit detailed description of any anticipated repair and maintenance plans for the drilling unit and equipment.	2	2 submittals	4
470(c); 418	Submit well specific drilling objectives, timelines, and updated contingency plans etc., for temporary abandonment.	2.5	2 submittals	5

Citation 30 CFR 250 Subpart D and NTL(s)	Reporting and Recordkeeping Requirement*	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (rounded)
470(d); 418	Submit detailed description concerning weather and ice forecasting for all phases; including how to ensure continuous awareness of weather/ice hazards at/between each well site; plans for managing ice hazards and responding to weather events; verification of capabilities.	23	1 submittal	23
470(e); 472; 418	Submit a detailed description of compliance with relief rig plans.	15	1 description	15
470(f); 471(c); 418	SCCE capabilities; submit equipment statement showing capable of controlling WCD; detailed description of your or your contractor's SCCE capabilities including operating assumptions and limitations; inventory of local and regional supplies and services, along with supplier relevant information; proof of contract or agreements for providing SCCE or supplies, services; detailed description of procedures for inspecting, testing, and maintaining SCCE; and detailed description of your plan ensuring all members of the team operating SCCE have received training to deploy and operate, include dates of prior and planned training.	5	2 submittals	10
470(g); 418	Submit a detailed description of utilizing best practices of API RP 2N during operations.	4	1 submittal	4
471(c); 470(f); 465(a)	Submit re-evaluation of your SCCE capabilities if well design changes; include any new WCD rate and demonstrate that your SCCE capabilities will comply with § 250.470(f) .	5	2 submittals	10
471(e)	Maintain all SCCE testing, inspection, and maintenance records for at least 10 years; make available to BSEE upon request.	15	2 records	30
471(f)	Maintain all records pertaining to use of SCCE during testing, training, and deployment activities for at least 3 years; make available to BSEE upon request.	12.5	2 records	25
490(c), (d)	Submit request for reclassification of H ₂ S zone; notify BSEE if conditions change.	Burden covered under 1014-0025.		0
490(f); 418(d)	Submit contingency plans for operations in H ₂ S areas (16 drilling, 6 work-over, 6 production).	40	30 plans	1,200
490(g)	Post safety instructions; document training; retain records at facility where employee works; train on occasion and/or annual refresher (approx. 2/year).	4	40 records	160
490(h)(2)	Document and retain attendance for weekly H ₂ S drills and monthly safety mtgs until operations completed or for 1 year for production facilities at nearest field office.	2	2,670 records	5,340
490(i)	Display warning signs—no burden as facilities would display warning signs and use other visual and audible systems.			0

Citation 30 CFR 250 Subpart D and NTL(s)	Reporting and Recordkeeping Requirement*	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (rounded)
490(j)(7-8)	Record H ₂ S detection and monitoring sensors during drilling testing and calibrations; make available upon request.	2	4,334 records	8,668
490(j)(12)	Propose alternatives to minimize or eliminate SO ₂ hazards—submitted with contingency plans—burden covered under § 250.490(f).			0
490(j)(13) (vi)	Label breathing air bottles—no burden as supplier normally labels bottles; facilities would routinely label if not.			0
490(l)	Notify without delay of unplanned H ₂ S releases (approx. 2/year).	Oral 1.5	26 notifications	39
		Written 1	26 written reports	26
490(o)(5)	Request approval to use drill pipe for well testing.	2	4 requests	8
490(q)(1)	Seal and mark for the presence of H ₂ S cores to be transported—no burden as facilities would routinely mark transported cores.			0
490(q)(9)	Request approval to use gas containing H ₂ S for instrument gas.	1.5	2 requests	3
490(q)(12)	Analyze produced water disposed of for H ₂ S content and submit results to BSEE.	2	166 submittals	332
NTL	Voluntary submit to USCG read only access to the EPIRB data for their moored drilling rig fleet before hurricane season.	0.25	80 submittals	20
TOTAL BURDEN			63,367 Responses	83,528 Burden Hours
			\$16,000 non-hour cost burdens	

* The forms mentioned in this collection, for the most part, are currently submitted electronically using eWell. BSEE will be allowing the option of electronic reporting for certain requirements not necessarily associated with a form.

(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. Instead, this cost should be included under “Annual Cost to Federal Government.”

The average respondent cost is \$139/hour. This cost is broken out in the following table using the Society of Petroleum Engineers Salary Survey data dated September 2017. See SPE.org website: <https://www.spe.org/industry/docs/2017-Salary-Survey-Highlight-Report.pdf>

Position	Base Pay Hourly Rate (\$/hr)	Hourly Rate including Benefits (1.4* x \$/hr)	Percent of time spent on collection	Weighted Average (\$/hour/ rounded)
Technical	\$76.69	\$107.36	23%	\$24.69
Engineers - Drilling	\$108.30	\$151.62	63%	\$95.52
Geologist	\$94.80	\$132.72	14%	\$18.58
Weighted Average (\$/hour)				\$138.79

*A multiplier of 1.4 (as implied by BLS news release USDL-18-1499, September 18, 2018 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

Based on a cost factor of \$139 per hour, we estimate the hour burden as a dollar equivalent to industry is \$11,610,392 (\$139 x 83,528 hours = \$11,610,392).

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 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.

We have identified one non-hour cost burden associated with this collection of information. The cost burden is being added due to 1014-AA39 rulemaking and is for Independent Third Party costs for \$8,000 (\$8,000 x 2 notifications = \$16,000). The total non-hour cost burdens are \$16,000. We have not identified any other non-hour cost burdens associated with this collection of information.

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 average government cost is \$84/hour (rounded). This cost is broken out in the below table using the Office of Personnel Management salary data for the REST OF THE UNITED STATES (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/>).

Position	Grade	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.6* x \$/hour)	Percent of time spent on collection	Weighted Average (\$/hour)
Clerical	GS-7/5	\$22.46	\$35.94	5%	\$1.80

Petroleum Engineer	GS-13/5	\$47.38	\$75.81	60%	\$45.49
Supv. Petroleum Engineer	GS-15/5	\$65.86	\$105.38	35%	\$36.88
Weighted Average (\$/hour)					\$84.17

*A multiplier of 1.6 (as implied by BLS news release USDL-18-1499, September 18, 2018 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

To analyze and review the information respondents submit for subpart D, we estimate the Government will spend an average of approximately 0.5 hours for each hour spent by lessees. Based on a cost factor of \$84 per hour, the annual burden on the Government for the regulatory requirements in this collection is \$3,508,176 (83,528 burden hours x 0.5 hours = 41,764 hours x \$84 = \$3,508,176).

Also, under § 250.461 respondents are required to record and submit logs, surveys, analyses etc. The BSEE has contracted out to TGS, for receiving the mentioned data, doing compliance reviews on the data, and for reformatting the data for easier use for BSEE. This contract costs \$500,000 per year, which BSEE splits with BOEM. Therefore, the cost to BSEE is \$250,000.

Therefore, the total annual burden on the Government is \$3,758,176 (\$3,508,176 for the regulatory burden costs + \$250,000 for the TGS contract = \$3,758,176).

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

The current OMB inventory includes 83,488 burden hours. In this submission, we are requesting a total of 83,528 hours. This represents a program increase of 40 hours due to this final rulemaking, 1014-AA39, Blowout Preventer Systems and Well Control Revisions.

BSEE is also requesting a program increase of \$16,000 in non-hour costs burdens for Independent Third Party costs due to this final rulemaking, 1014-AA39, Blowout Preventer Systems and Well Control Revisions.

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 BSEE will not tabulate or publish the data.

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 BSEE will display the OMB control number and approval expiration date on Forms BSEE-0125, BSEE-0133, and BSEE-0133S, and elsewhere appropriately.

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

To the extent that the topics apply to this collection of information, we are not making any exceptions to the “Certification for Paperwork Reduction Act Submissions.”