

Supporting Statement A
30 CFR 250, Subpart Q, Decommissioning Activities
OMB Control Number 1014-0010
OMB Expiration Date: January 31, 2020

Terms of Clearance: BSEE will instruct respondents to identify confidential commercial or proprietary information when they submit to BSEE, and this information will be protected 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. This collection of information is approved for three years. If BSEE requests an extension it must include with the supporting statement a report on the types of production facilities for which it has sufficient information to estimate decommissioning costs, and the amount of additional information required to estimate the remaining types of platforms.

In response, BSEE provided the necessary instruction to respondents to identify confidential commercial or proprietary information via a Notice to Lessees and Operators (see NTL No. 2017-N02). However, regarding this Term of Clearance (TOC), note that BSEE is still in need of continuing collection of such data and that BSEE requests it not be bound by these TOC on the renewals of this ICR. These regulations were originally intended for the continuous collection of data due to the many factors that impact the cost to decommission offshore infrastructure (e.g., day rates for decommissioning equipment, advancements in technology, etc.) and the resulting volatility it causes on such costs over time. That is, in order for BSEE to have the most accurate cost estimates which affect financial assurance collected by BOEM, actual expenditure data through time is invaluable to allow BSEE to have a basis for shifting its estimates consistent with changes being incurred by industry. Therefore, in order to protect the American taxpayer interests, BSEE feels we will not be in a position to stop collecting actual expenditure data in the future.

In addition, BSEE offers the following justifications to continue collecting such data without the need for a report through the TOC every three years:

1. Grouping and subgrouping wells, structures and pipeline based upon characteristics such as water depth, borehole measured depth, structure characteristics, and pipeline segment length, to name a few, is essential for systematic and timely decommissioning cost analyses on such a diverse collection of assets. Diverse, too, in that some groups have small populations relative to others, e.g. deep water floating and fixed structures relative to caissons. Correspondingly, the sample (report) counts vary widely among different groups/subgroups. For some group/subgroups, BSEE has not received enough reports (samples) for it to be reasonably determined that said reports are representative of the members of the group/subgroup (population).
2. To date, BSEE has received no cost reports on decommissioning (removal) of certain subsea infrastructure. This group includes non-borehole assets like subsea manifolds, templates, etc. of which there are many hundreds of installations.
3. From the data collected, only some data are comparable for use. For example, a well cost

summary submitted from a well that has been partially plugged is not comparable to wells that require full plugging operations.

4. Incorporating time series data can improve BSEE's estimates. Changes in real/nominal costs and economic activity, particularly regarding the somewhat volatile oil and gas industry, can significantly affect the determination of Fair Value. Collected data used with that provided by the Bureau of Labor Statistics, the Energy Information Administration, the Federal Reserve Board, the American Petroleum Institute and other reputable sources may allow BSEE to make adjustments to reported costs to reflect a dynamic economic environment. This can lead to even more robust cost estimating relationships.

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 that Act related to mineral resources on the OCS. Such rules and regulations will apply to all operations conducted under a lease, right-of-way, or a right-of-use and easement. Operations on the OCS must preserve, protect, and develop oil and natural gas resources in a manner that is consistent with the need to make such resources available to meet the Nation's energy needs as rapidly as possible; to balance orderly energy resource development with protection of human, marine, and coastal environments; to ensure the public a fair and equitable return on the resources of the OCS; and to preserve and maintain free enterprise competition.

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

The Independent Offices Appropriations Act (31 U.S.C. 9701), the Omnibus Appropriations Bill (Pub. L. 104-133, 110 Stat. 1321, April 26, 1996), and OMB Circular A-25, authorize Federal agencies to recover the full cost of services that confer special benefits. Under the Department of the Interior's implementing policy, the Bureau of Safety and Environmental Enforcement (BSEE) is required to charge fees for services that provide special benefits or privileges to an identifiable non-Federal recipient above and beyond those which accrue to the public at large. Respondents pay cost recovery fees when removing a platform or other facility, or for decommissioning a pipeline lease term or a right-of-way.

This authority and responsibility are among those delegated to BSEE. The regulations at 30 CFR 250, Subpart Q, concern decommissioning of platforms, wells, and pipelines, as well as site clearance and platform removal and are the subject of this collection. This request also covers the related Notices to Lessees and Operators (NLTs) 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 collected under Subpart Q (to see the specific information collected, see A.12) primarily for the following reasons:

- To determine the necessity for allowing a well to be temporarily abandoned, the lessee/operator must demonstrate that there is a reason for not permanently plugging the well, and the temporary abandonment will not interfere with fishing, navigation, or other uses of the OCS. We use the information and documentation to verify that the lessee/operator is diligently pursuing the final disposition of the well and has performed the temporary plugging of the wellbore.
- To ensure the information submitted in initial decommissioning plans in the Alaska and Pacific OCS Regions will permit BSEE to become involved on the ground floor planning of platform removals anticipated to occur in these OCS regions.
- To ensure that all objects (wellheads, platforms, etc.) installed on the OCS are properly removed using procedures that will protect marine life and the environment during removal operations, and the site cleared so as not to conflict with or harm other uses of the OCS in coordination with other Federal, State, and local government agencies.
- To ensure that information regarding decommissioning a pipeline in place will not constitute a hazard to navigation and commercial fishing operations, unduly interfere with other uses of the OCS, such as sand resource areas for coastal restoration projects, or have adverse environmental effects.

- To verify that decommissioning activities comply with approved applications and procedures and are satisfactorily completed.
- To evaluate and approve the adequacy of the equipment, materials, and/or procedures that the lessee or operator plans to use during well modifications and changes in equipment, etc.
- To help BSEE better estimate future decommissioning costs for OCS leases, rights-of-way, and rights of use and easements. BSEE's future decommissioning cost estimates may then be used by BOEM to set necessary financial assurance levels to minimize or eliminate the possibility that the government will incur abandonment liability. The information will assist BSEE and BOEM in meeting their stewardship responsibilities and in their roles as regulators.

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.

Currently, BSEE receives 70 percent of all information pertaining to this collection electronically via e-mail and eWell--a secure web application.

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 each lease, and similar information is not available from other sources. The DOI and other Government agencies have Memoranda of Understanding that defines the responsibilities of their agencies with respect to activities in the OCS. These are effective in avoiding duplication of regulations and reporting requirements. The information collected for decommissioning cost estimates will be shared with BOEM to set necessary financial assurance levels to minimize or eliminate the possibility that the government will incur abandonment liability.

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 a significant 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 may have fewer than 500 employees and would be considered small businesses as defined by the Small Business Administration. With respect to the requirements for site clearance of abandoned wells and decommissioned pipelines, if these activities were not performed, it is more likely that other users of the OCS would be adversely affected, many of which are small businesses. Regulations require safe work practices and

protection of the environmental resources; therefore, the hour burden on any small entity subject to these regulations and associated collection of information cannot be reduced to accommodate them.

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

If we did not collect the information, we could not ascertain: (a) accurate decommissioning cost data to analyze and estimate future decommissioning costs; (b) whether respondents are diligently pursuing the final disposition of a well, platform, or pipeline; (c) whether the lessee/operator has documented the temporary plugging of the well and has marked the location; or (d) that site clearance and removal operations are performed in an environmentally safe and effective manner.

Information is collected on occasion or varies by section depending on the requirement, except for annual reporting on temporary abandonment of wells until the lessee/operator re-enters to complete or to permanently plug the well. The annual report is necessary to ensure the diligent pursuit of the final well disposition.

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;

- § 250.1713. The BSEE requires notification within 48 hours before beginning well plugging and abandonment operations in order to have the option of scheduling BSEE personnel to observe operations on site to ensure they are conducted in accordance with applicable regulations and approved procedures.
- § 250.1722(c). The BSEE requires notification within 5 days in the event a trawl hangs-up on (or damages) a protective device (dome) over a subsea wellhead or casing stub in order to ensure that repairs are initiated as soon as possible to eliminate or minimize the possibility that shrimp boats will hang-up on the obstruction and cause damage to their nets. It allows BSEE to notify other users of the OCS of the obstruction in a timely manner, thereby reducing the risk of damage to their equipment.
- § 250.1725(e). The BSEE requires notification within 48 hours before beginning platform removal operations in order to have the option of scheduling BSEE personnel to observe removal operations on site in the field to ensure that they are conducted in accordance with applicable regulations and approved procedures for the use of explosives, removal of platform piling to 15 feet below the seafloor, proper site clearance, etc.

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

- (c) requiring respondents to submit more than an original and two copies of any document;***
 - (d) requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than 3 years;***
 - (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***
- Items (b) through (g) are 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 1320.8(d), BSEE published a 60-day notice in the Federal Register on July 23, 2019 (84 FR 35421). Also, 30 CFR 250.199 explains that BSEE will accept comments at any time on the information collection aspects of 30 CFR 250. We display the OMB control number and provide the address for sending comments to BSEE. We received no comments in response to the *Federal Register* notice.

To prepare this information collection renewal request, companies were contacted to determine the estimated burden this subpart places on respondents: The following company representatives that commented were:

Chevron U.S.A. Inc., Asset Retirement Team Lead, 205 Holiday Blvd, Covington, Louisiana 70433, (985) 773-6053.

EnVen Energy Ventures, LLC, Regulatory Manager, 333 Clay Street, Suite 4200, Houston, Texas 77002, (713) 335-7041.

Anadarko Petroleum Corporation, Staff Regulatory Analyst, (832) 636-1694, 1201 Lake Robbins Drive, The Woodlands, Texas 77380

W&T Offshore, Inc., Regulatory Manager, Nine Greenway Plaza, Suite 300, Houston, Texas, US 77046-0908, (713) 626-8525.

Chevron U.S.A., Inc., Regulatory Affairs Manager, 3916 State Street, Suite 200, Santa Barbara, California, 93105, (805) 979-3506.

All the different reporting and recordkeeping requirements that are listed in the following Subpart Q burden table (Section A.12) were thoroughly reviewed by the company representatives listed. These representatives had no concerns regarding the availability of data, frequency of collection, clarity of instructions, and elements being collected at this time. The companies that replied to our request provided the burden estimates that are reflected in Section A.12.

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.

The 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 burdens.

Potential respondents include Federal OCS oil, gas, and sulfur lessees and/or operators and holders of pipeline rights-of-way. 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, completing and reviewing the collection of information and are based on informal discussions with the listed respondents in Section A.8. Submissions are generally on occasion, varies by section, and annual. Responses are mandatory. We estimate the total annual burden is 11,677 hours. Refer to the following table for a breakdown of the burdens.

L/T = Lease Term

Burden Breakdown

ROW = Right of Way

Citation 30 CFR 250 Subpart Q	Reporting Requirement*	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (Rounded)
		Non-Hour Cost Burdens		
General				
1704(g); 1706(a), (f); 1712; 1715; 1716; 1721(a),(d), (f)- (g); 1722(a), (b), (d); 1723(b); 1743(a); Sub G	These sections contain references to information, approvals, requests, payments, etc., which are submitted with an APM, the burdens for which are covered under its own information collection.	APM burden covered under 1014-0026		
1700 thru 1754	General departure and alternative compliance requests not specifically covered elsewhere in Subpart Q regulations.	Burden covered under Subpart A 1014-0022		0
1703; 1704	Request approval for decommissioning.	Burden included below		0
1704(i), (j)	Submit to BSEE, within 120 days after completion	1	1,320	1,320

Citation 30 CFR 250 Subpart Q	Reporting Requirement*	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (Rounded)
		Non-Hour Cost Burdens		
	of each decommissioning activity, a summary of expenditures incurred; any additional information that will support and/or verify the summary.		summaries (including pipelines)/ additional information	
1704(i); NTL	Request and obtain approval for extension of 120-day reporting period; including justification.	15 min.	75 requests	19
1704(i)	Submit certified statement attesting to accuracy of the summary for expenditures incurred.	Exempt from the PRA under 5 CFR 1320.3(i) (1).		0
1712	Required data if permanently plugging a well.	Requirement not considered Information Collection under 5 CFR 1320.3(h)(9).		0
1713	Notify BSEE 48 hours before beginning operations to permanently plug a well.	0.5	725 notices	363
1721(f)	Install a protector structure designed according to 30 CFR 250, Subpart I, and equipped with aids to navigation. (These requests are processed via the appropriate Platform Application, 30 CFR 250 Subpart I by the OSTs.)	Burden covered under Subpart I 1014-0011		0
1721(e); 1722(e), (h) (1); 1741(c)	Identify and report subsea wellheads, casing stubs, or other obstructions; mark wells protected by a dome; mark location to be cleared as navigation hazard.	U.S. Coast Guard requirements.		0
1722(c), (g) (2); 1704(h)	Notify BSEE within 5 days if trawl does not pass over protective device or causes damages to it; or if inspection reveals casing stub or mud line suspension is no longer protected.	1	11 notices	11
1722(f), (g) (3)	Submit annual report on plans for re-entry to complete or permanently abandon the well and inspection report.	2.5	98 reports	245
1722(h)	Request waiver of trawling test.	1.5	4 requests	6
1725(a)	Requests to maintain the structure to conduct other activities are processed, evaluated and permitted by the OSTs via the appropriate Platform Application process, 30 CFR 250 Subpart I. (Other activities include but are not limited to activities conducted under the grants of right-of-ways (ROWS), rights-of-use and easement (RUEs), and alternate rights-of-use and easement authority issued under 30 CFR 250 Subpart J, 30 CFR 550.160, and / or 30 CFR 585, etc.)	Burden covered under Subpart I 1014-0011		0
1725(e)	Notify BSEE 48 hours before beginning removal of platform and other facilities.	0.5	133 notices	67
1726; 1704(a)	Submit initial decommissioning application in the Pacific and Alaska OCS Regions.	20	2 application	40

Citation 30 CFR 250 Subpart Q	Reporting Requirement*	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (Rounded)
		Non-Hour Cost Burdens		
1727; 1728; 1730; 1703; 1704(b); 1725(b)	Submit final application and appropriate data to remove platform or other subsea facility structures (This included alternate depth departures and / or approvals of partial removal or toppling for conversion to an artificial reef.)	28	153 applications	4,284
		\$4,684 fee x 153 = \$716,652		
1729; 1704(c)	Submit post platform or other facility removal report; supporting documentation; signed statements, etc.	9.5	133 reports	1,264
1740; 1741(g)	Request approval to use alternative methods of well site, platform, or other facility clearance; contact pipeline owner/operator before trawling to determine its condition.	12.75	30 requests /contacts	383
1743(b); 1704(f), (h)	Verify permanently plugged well, platform, or other facility removal site cleared of obstructions; supporting documentation; and submit certification letter.	5	117 certifications	585
1750; 1751; 1752; 1754; 1704(d)	Submit application to decommission pipeline in place or remove pipeline (L/T or ROW).	10	142 L/T applications	1,420
		\$1,142 L/T decommission fee x 142 = \$162,164		
		10	122 ROW applications	1,220
		\$2,170 ROW decommissioning fees x 122 = \$264,740		
1753; 1704(e)	Submit post pipeline decommissioning report.	2.5	180 reports	450
Total Burden			3,245 Responses	11,677 hours
			\$1,143,556 Non-Hour Cost Burdens	

* In the future, BSEE may require electronic filing of some submissions.

(c) Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.

The average respondent cost is \$134/hour (rounded). This cost is broken out in the following table using the Society of Petroleum Engineers (SPE) data dated December 2018. See SPE document/website: <https://www.spe.org/industry/docs/2018-Salary-Survey-Highlight-Report.pdf>.

Position	Level	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.4* x \$/hour)	Percent of time spent on collection	Weighted Average (\$/hour)
Non-Engineering Technical	6	\$67.79	\$94.90	15%	\$14.24

Earth Science/Geology	All Workers	\$93.60	\$131.04	70%	\$91.73
Finance or Administration	13	\$131.94	\$184.71	15%	\$27.71
Weighted Average (\$/hour)					\$134

* A multiplier of 1.4 for private industry (as implied by BLS news release USDL-19-1649, September 17, 2019 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

Based on a cost factor of \$134 per hour, we estimate the hour burden as a dollar equivalent is \$1,564,718 (\$134 x 11,677 hours = \$1,564,718).

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 in Item 12).

(a) The cost estimate should be split into two components: (1) a total capital and start-up cost component (annualized over its expected useful life) and (2) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

(b) If cost estimates are expected to vary widely, agencies should present ranges of cost burden and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

(c) Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

We have identified three non-hour paperwork cost burdens for this collection. Respondents pay cost recovery fees when removing a platform or other facility under § 250.1727 for \$4,684, or for decommissioning a pipeline under §§ 250.1751(a) and 250.1752(a) – L/T for \$1,142 or a ROW for \$2,170. We estimate a total reporting non-hour cost burden of \$1,143,556 for this collection. Refer to the table in Section A.12 of this supporting statement for the specific non-hour paperwork cost burden breakdown. 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 \$68/hour. This cost is broken out in the below table using the current Office of Personnel Management salary data for the REST OF THE UNITED STATES (<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-5/5	\$18.44	\$29.50	4%	\$1.18
Technician(s)	GS-11/5	\$33.80	\$54.08	20%	\$10.82
Engineer(s)	GS-12/5	\$40.51	\$64.82	30%	\$19.45
Engineer(s)	GS-13/5	\$48.17	\$77.07	40%	\$30.83
Supervisory	GS-14/5	\$56.92	\$91.07	6%	\$5.46
Weighted Average (\$/hour)					\$68

* A multiplier of 1.6 for government employees (as implied by BLS news release USDL-19-1649, September 17, 2019 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

To analyze and review the information respondents submit for Subpart Q, we estimate the Government will spend an average of approximately 0.75 hour for each hour spent by respondents. Based on a cost factor of \$68 per hour, the total annual estimated burden on the Government is \$595,544 (11,677 burden hours x 0.75 hours = 8,758 hours (rounded) x \$68 = \$595,544).

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

The current OMB approved annual hour burden is 15,524 burden hours for this collection of information. This submission requests 11,677 burden hours. The adjustment decrease of 4,366 hours is due to re-estimating the average annual responses (BSEE query's through eWell/TIMSWeb) and the amount of time required to respond based on Industry outreach/consultation required in No. 8 of this Supporting Statement A. The program increase of 519 hours is due to BSEE publishing final rule 1014-AA32 (81 FR 80587), Decommissioning Costs for Pipelines, on November 16, 2016, to require respondents submit a summary of actual decommissioning expenditures for each activity, including pipelines. Under § 250.1704(i) and (j) – Summaries – General, we added 500 responses and 500 burden hours, and under 250.1704(i) – Request extension, we added 75 responses and 19 hours. No costs associated with these requirements.

The current OMB approved annual reporting and recordkeeping non-hour cost burden is \$1,686,396 for this collection of information. This submission requests \$1,143,556. The adjustment decrease of \$542,840 is due to re-estimating the average number of annual decommissioning applications BSEE received that have associated cost recovery fees.

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.

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.

There are no forms in this information collection request; however, BSEE displays the OMB control number at § 250.199.

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

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