1SUPPORTING STATEMENT

Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Review (40 CFR part 60, subpart OOOOa) (Proposed Amendments As A Result of Review Under Executive Order 13783)

PART A

1.0 Identification of the Information Collection

(a) Title and Number of the Information Collection.

The title of the Information Collection Request (ICR) is Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Review (40 CFR part 60, subpart OOOOa), U.S. Environmental Protection Agency (EPA) tracking number 2523.03 Office of Management and Budget (OMB) Control Number 2060-0721.

(b) Short Characterization.

On June 3, 2016, EPA published a final rule titled "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources; Final Rule," at 81 FR 35824 (2016 NSPS OOOOa). The rule established New Source Performance Standards (NSPS) for greenhouse gas and volatile organic compound (VOC) emissions from the oil and natural gas sector.

Following promulgation of the final rule, the Administrator received petitions for reconsideration of several provisions of the 2016 NSPS OOOOa. The EPA addressed those specific reconsideration issues in a separate proposal published on October 15, 2018 (2018 NSPS OOOOa Reconsideration Proposal).^a

On March 28, 2017, President Donald Trump issued Executive Order (EO) 13783, entitled "Promoting Energy Independence and Economic Growth," which directs agencies to review existing regulations that potentially burden the development of domestic energy resources, and appropriately suspend, revise, or rescind regulations that unduly burden the development of U.S. energy resources beyond what is necessary to protect the public interest or otherwise comply with the law. The EPA is proposing amendments to subpart OOOOa as a result of this EO 13783 review (2019 NSPS OOOOa EO 13783 Review Proposal). Specifically, if finalized, the proposed amendments as a result of the EPA's EO 13783 review would:

^a 83 FR 52056

- Remove sources in the transmission and storage segment from the source category and rescind the NSPS requirements applicable to those sources, and
- Rescind the methane requirements of the NSPS applicable to sources in the production and processing segments.

As an alternative proposal, the EPA is proposing to rescind the methane requirements of the NSPS applicable to all oil and natural gas sources and not amending the source category. This ICR estimates the information collection burden for NSPS OOOOa considering the proposed amendments in 2019 NSPS OOOOa EO 13783 Review Proposal. The estimates presented in the body of this document reflect the impacts of NSPS OOOOa assuming a combination of the amendments contained in the 2018 NSPS OOOOa Reconsideration Proposal and the amendments in the 2019 NSPS OOOOa EO 13783 Review Proposal.^{a,b} In addition, the burden is estimated without consideration of the 2018 proposed amendments and presented in an Appendix.

The affected respondents are owners or operators of onshore oil and natural gas affected facilities (40 CFR 60.5365a). For the purposes of this ICR, it is assumed that all oil and natural gas affected facilities located in the U.S. are owned and operated by the oil and natural gas industry (the "Affected Public") and none of the affected facilities in the U.S. are owned or operated by state, local, tribal or the Federal government. All affected facilities are assumed to be privately owned for-profit businesses.

This ICR estimates that an average of 3,648 respondents will be affected over the threeyear period (2019-2021). The average annual burden for the recordkeeping and reporting requirements for these owner and operators is 230,285 person-hours, with an average annual cost of \$14,177,438 over the three-year period (2019-2021). This represents a burden reduction of 2 percent compared to the burden estimated for the 2016 NSPS OOOOa (see Appendix A). This represents a burden reduction of 16 percent compared to the 2018 NSPS OOOOa Reconsideration Proposal amendments (see Appendix B). The burden associated with strictly the 2019 NSPS OOOOa EO 13783 Review Proposal is presented in Appendix C.

^a These burden estimates will be updated when the NSPS OOOOa EO 13783 Review Amendments are finalized to reflect any changes made between proposal and promulgation, as well as to reflect the final rule changes resulting from the NSPS OOOOa reconsideration.

^b The 2019 NSPS OOOOa EO 13783 Review Proposal package also includes minor amendments to the 2012 NSPS OOOO regarding storage vessel applicability for those vessels in the transmission and storage sector. However, these amendments do not have any impact on the information collection burden for NSPS OOOO.

2. Need For and Use of the Collection

(a) Need/Authority for the Collection.

EPA is charged under section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

... application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated. Section 111(a)(l).

The Agency refers to this charge as selecting the best system of emissions reduction (BSER). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every 8 years.

In addition, section 114(a) of the CAA states that the Administrator may require any owner or operator subject to any requirement of this Act to:

- establish and maintain such records;
- make such reports;
- install, use, and maintain such monitoring equipment;
- use such audit procedures, or methods;
- sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe);
- keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical;
- submit compliance certifications in accordance with section 114(a)(3); and
- provide such other information as the Administrator may reasonably require.

The information collection activities being proposed represent a reduction in the burden associated with recordkeeping and reporting requirements under NSPS OOOOa and are the minimum necessary for the Administrator to confirm the compliance status of new and modified oil and natural gas affected facilities. These recordkeeping and reporting requirements are authorized by CAA section 114.

(b) Practical Utility/Users of the Data.

The information collected will be used by the delegated authority (state agency, or Regional Administrator if there is no delegated state agency) to ensure that the standards and other requirements of subpart OOOOa are being achieved. Based on review of the recorded information at the site and the reported information, the delegated permitting authority can identify affected facilities that may not be complying and decide which affected facilities, records, or processes may need inspection.

3. Nonduplication, Consultations, and Other Collection Criteria

(a) Nonduplication.

The information-gathered under this ICR will replace the information gathered under the rule prior to being amended. The recordkeeping and reporting requirements for the 2016 NSPS OOOOa were developed following similar reporting requirements as outlined in "Mandatory Reporting of Greenhouse Gases: Subpart W Oil and Natural Gas" in 40 CFR 98.2 and 40 CFR 98.4. By remaining consistent with subpart W, EPA minimized the burden required to monitor and show compliance. In addition, if a State or local agency has adopted their own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards.^a Therefore, no duplication exists. The proposed deregulatory amendments addressed by this ICR further reduces the burden and potential for duplication of recordkeeping and reporting requirements under NSPS OOOOa.

(b) Public Notice Required Prior to ICR Submission to OMB.

The preamble for the proposed deregulatory amendments as a result of EPA's EO 13783 review provides public notice of this proposed ICR. EPA will consider comments when preparing the revised ICR and the preamble to the final rule will provide public notice on the revised ICR.

(c) Consultations.

^a For example, paragraph 60.5420a(a)(2)(ii) states that "If you are subject to state regulations that require advance notification of well completions and you have met those notification requirements, then you are considered to have met the advance notification requirements of paragraph (a)(2)(i) of this section."

In developing the 2016 NSPS OOOOa, the 2018 NSPS OOOOa Reconsideration Proposal, and the 2019 NSPS OOOOa EO 13783 Review Proposal, the EPA performed a comprehensive review of existing state rules and industry standards, visited oil and natural gas sites, and consulted with individual companies, state agencies, and environmental groups. The main organizations that provided expert advice during the development of this rule include the Agency's industry experts. Stakeholder meetings and contacts are documented in the docket for the 2016 final rule (Docket No. EPA-HQ-OAR-2010-0505), the docket for the 2018 NSPS OOOOa Reconsideration Proposal (Docket No. EPA-HQ-OAR-2017-0483), and the docket for the 2019 NSPS OOOOa EO 13783 Review Proposal (Docket No. EPA-HQ-OAR-2017-0757).

(d) Effects of Less Frequent Collection.

Respondents must monitor all specified criteria at each affected facility and maintain these records for 2 years, as specified under 40 CFR 60.7. The reporting frequency to EPA has been established/amended to minimize the burden on owners and operators of affected facilities. If the information required by NSPS OOOOa were collected less frequently, the likelihood of detecting violations would be reduced.

(e) General Guidelines.

This collection of information is consistent with all OMB guidelines established by OMB at 5 CFR part 1320, section 1320.5.

(f) Confidentiality.

All information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to EPA regulations set forth in 40 CFR 2.201 et seq., Chapter 1, Part 2, Subpart B-Confidentiality of Business Information.

(g) Sensitive Questions.

This section is not applicable because this ICR does not involve matters of a sensitive nature.

4. The Respondents and the Information Requested

(a) Respondents/NAICS Codes.

Potential respondents after the proposed amendments to NSPS OOOOa would be owners or operators of new, modified or reconstructed oil and natural gas affected facilities as defined under the rule. The North American Industry Classification System (NAICS) codes for the oil and gas industry include: 211120 (Crude Petroleum Extraction); 211130 (Natural Gas

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Extraction); 221210 (Natural Gas Distribution); 486110 (Pipeline Distribution of Crude Oil); 486210 (Pipeline Transportation of Natural Gas).

(b) Information Requested.

(i) Data Items, Including Recordkeeping Requirements

Recordkeeping	
For well affected facilities, record location and well identification information. Maintain completion log records for each completion operation. For wells exempt from one or more requirements, maintain records to support exemption.	60.5375a(b); 60.5410a(a); 60.5415a(a); 60.5420a(c)(1)
For well affected facilities with \leq 300 scf of gas per stock tank barrel of oil produced, keep records to demonstrate exemption.	60.5375a(g)(2); 60.5420a(c) (1)(vi).
For pneumatic pump affected facilities that are not controlled, maintain information related to equipment, purchase, location, and manufacturer specifications. Prepare and submit applicable certification and maintain records. Maintain information related to equipment, purchase, location, and manufacturer specifications.	60.5393a(b)(3)-(5); 60.5393a(e); 60.5410a(e)(8); 60.5420a(c)(16)
For pneumatic pump affected facilities that are controlled, maintain information related to equipment, purchase, location, manufacturer specifications, and control. Maintain certification of CVS capacity; record results of CVS and by-pass inspections, maintenance, and corrective actions.	60.5393a(c), (e); 60.5410a(e) (8); 60.5420a(c)(16); 60.5411a(c)(3)(i)(A); 60.5411a(d); 60.5416a(c); 60.5420a(c)(6)-(8), (16) and (17).
For storage vessel affected facilities, maintain compliance records for control device including visible emission observation results, inspection results, corrective actions, and maintenance. Maintain certification of CVS capacity; record results of CVS and by-pass inspections, maintenance, and corrective actions.	60.5395a(d)(3); 60.5411a(c) (3)(i)(A); 60.5411a(d); 60.5412a(c) and (d); 60.5413a(d) and (e); 60.5416a(c); 60.5417a(h)60.5420a(c)(5)- (8), (12)-(14), and (17).
For affected facilities at onshore gas processing plants, records of subject equipment, records of leak detection and repair program.	60.5400a(a), 60.482-1a(b) and (d); 60.482-7a; 60.482- 10a
For sweetening unit affected facilities at onshore natural gas processing plants, records of sulfur levels, acid gas, calculations, measurements, and compliance records.	60.5407a(a); 60.5423a
Notifications and Reporting	
Notify the Administrator at least two days prior to a well completion operation.	60.5420a(a)(2)
Submit an annual report, per operating entity, for all wellhead, pneumatic controller, pneumatic pump, storage vessel, centrifugal and reciprocating compressor affected facilities.	60.5420a(b)
Notification of construction or reconstruction.	60.7(a)(1)
Notification of performance test.	60.8(d)
Annual reports including those of excess emissions.	60.5417a(c); 60.487a(c)(2) (i)-(vi)
Performance test results.	60.487a(e)
Semiannual report on excess emissions from and performance of continuous monitoring system, and/or summary report forms at processing plants. Annual report on excess emissions from and performance of continuous monitoring system for sweetening units.	60.5422a(b), 60.5410a(g)(3) 60.5423a(b)

(ii) Respondent Activities

Respondent Activities						
ead instructions/rule.						
ather relevant information.						
erform initial performance test and repeat performance tests if necessary.						
Vrite the notifications and reports listed above.						
nter information required to be recorded above.						
ubmit the required reports developing, acquiring, installing, and utilizing technology and systems for the						
urpose of collecting, validating, and verifying information.						
evelop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining	g					
oformation.						
evelop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing						
oformation.						
djust the existing ways to comply with any previously applicable instructions and requirements.						
rain personnel to be able to respond to a collection of information.						
ransmit, or otherwise disclose the information.						

5. The Information Collected–Agency Activities, Collection Methodology, and Information Management

(a) Agency Activities.

The combined Federal government (EPA) burden of NSPS OOOOa after the 2018 NSPS OOOOa Reconsideration Proposal amendments and the 2019 NSPS OOOOa EO 13783 Review Proposal amendments are shown in Tables 2a-2d (located at the end of this supporting statement). The 2019 NSPS OOOOa EO 13783 Review Proposal amendments would reduce the burden associated due to the removal of requirements for sources in the transmission and storage segment, but these amendments do not impact the estimated burden on the Federal government (EPA) estimated for the 2018 NSPS OOOOa Reconsideration Proposal.

(b) Collection Methodology and Management.

Data and records maintained by the respondents will be tabulated and published for use in compliance and enforcement programs of the delegated permitting authority. Information contained in the reports will be required to submit records electronically to EPA's Central DATA Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI). CDX enables fast, efficient and more accurate environmental data submissions from state and local governments, industry and tribes to EPA and participating program offices. EPA's CDX is the point of entry on the Environmental Information Exchange Network (Exchange Network) for environmental data submissions to the Agency. CDX works with both EPA program offices looking for a way to better manage incoming data, and stakeholders looking for a way to reduce burden from reporting requirements.

(c) Small Entity Flexibility.

The proposed amendments represent a deregulatory action, and the burden on all entities affected by the proposed amendments to NSPS OOOOa, including small entities, is reduced compared to the 2016 NSPS OOOOa. Therefore, the proposed amendments will relieve regulatory burden for all directly-regulated small entities.

(d) Collection Schedule.

The specific frequency for each information collection activity within this request is shown in Tables 1a-1d.

6. Estimating the Burden and Cost of the Collection

(a) Estimating Respondent Burden.

The combined respondent burden of NSPS OOOOa if the 2018 NSPS OOOOa Reconsideration Proposal amendments and the 2019 NSPS OOOOa EO 13783 Review Proposal amendments are finalized are shown in Tables 1a-1d. These numbers are based on the estimated number of affected facilities that would be subject to the requirements of the NSPS from years 2019 to 2021, if both sets of proposed amendments are finalized.

(b) Estimating Respondent Costs.

(i) Estimating Labor Costs.

This ICR uses the following labor rates: \$60.56 per hour for technical labor, \$123.27 per hour for management labor, and \$40.72 for clerical labor. These rates include an increase of 110 percent to account for the benefit packages available to those employed by private industry. These rates are from the *May 2016 National Occupational Employment and Wage Estimates United States* published by the Bureau of Labor and Statistics

(https://www.bls.gov/oes/current/oes_nat.htm). Costs have been estimated in 2016 dollars for this ICR, which is consistent with the costs (i.e. cost of control) estimated in the supporting documents developed for the proposed amendments to subpart OOOOa.

The information collection activities for the amended NSPS OOOOa are presented in Tables 1a-1d. Because the data are already collected by respondents as part of normal operations, no respondent costs are associated with information collection activities.

(*ii*) *Estimating Capital and Operations and Maintenance (O&M) Costs.* The EPA estimates that there will not be additional capital and O&M monitoring costs for newly affected facilities as a result of EPA's proposed deregulatory amendments under EO 13783.

(c) Estimating Agency Burden and Cost.

Because reporting and recordkeeping requirements on the part of the respondents are required under the operating permits rules in 40 CFR part 70 or part 71 and the part 60 NSPS General Provisions, no operational costs will be incurred by the Federal Government. Publication and distribution of the information are part of the Compliance Data System, with the result that no Federal costs can be directly attributed to the ICR. Examination of records to be maintained by the respondents will occur incidentally as part of the periodic inspection of facilities that is part of EPA's overall compliance and enforcement program, and, therefore, is not attributable to the ICR. The only costs that the Federal government will incur are user costs associated with the analysis of the reported information, as presented in Tables 2a-2d.

This cost is based on the average hourly labor rate as follows:

Managerial	\$64.16 (GS-13, Step 5, \$38.92 + 60%)
Technical	\$47.62 (GS-12, Step 1, \$28.88 + 60%)
Clerical	\$25.76 (GS-6, Step 3, \$15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2016 General Schedule rates of pay, which excludes locality. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Costs have been estimated in 2016 dollars for this ICR to be consistent with other costs (i.e., cost of control) estimated in the development of subpart OOOOa.

(d) Estimating the Respondent Universe and Total Burden and Costs.

It was estimated that an average of 3,648 respondents per year will be subject to NSPS OOOOa during the 3-year period of this ICR as shown in the following table below. This estimate encompasses the number of companies that the EPA expects will submit reports separately as its own entity. The average annual number of respondents per year is calculated using the following table.

Year	Annual Number of Respondents
1	3,428
2	3,648
3	3,868
Average	3,648

For NSPS OOOOa, the components of the total annual responses attributable to this ICR are notifications of well completions/recompletions from an average of 2,328 companies over the three-year period, notification of construction, reconstruction and modification from an average of 8 companies over the three-year period, annual reports from an average of 3,606 companies over the three-year period, and semiannual reports from an average of 42 companies over the three-year period. (Processing facilities report semiannually, all others annually).

Total Annual Responses								
Information Collection Activity	Number of Respondents ^a	Number of Responses	Total Annual Responses					
Notification of well completions/recompletions	2,328	1	2,328					
Notification of construction/reconstruction/modification	8	1	8					
Annual Compliance Reports	3,606	1	3,606					
Semiannual Compliance Reports	42	2	84					
		Total	6,026					

The average number of annual responses per year is calculated using the following table.

^aThe EPA assumes each facility will make the appropriate notifications and that each respondent will submit the annual or semiannual report for all affected facilities in each year.

(e) Bottom-Line Burden Hours and Cost Tables.

(*i*) *Respondent tally*. The bottom-line respondent burden hours and costs for the three years (2019-2021) covered by this ICR are presented in Table 1d (located at the end of this supporting statement). The average annual burden for the recordkeeping and reporting requirements in this ICR for the estimated 3,648 respondents that are subject to the rule is 230,285 labor hours, with an annual average cost of \$14,177,438. The average annual burden represents the hours and costs for respondents in production and processing, which is the only segment that would be have an estimated burden if the 2019 NSPS OOOOa EO 13783 Review Proposal amendments are finalized.

(ii) The Agency Tally. The average annual Federal Government cost is \$788,398 for 16,679 labor hours for subpart OOOOa. The bottom-line Agency burden hours and costs, presented in Table 2d, are calculated from Tables 2a-2c by adding person-hours per year down each column for technical, managerial, and clerical staff, and by adding down the cost column.

(iii) Variations in the annual bottom line. This section does not apply since no significant variation is anticipated.

(f) Reasons for Change in Burden.

(*i*) 2016 NSPS ICR Updated Baseline. The original burden estimated for the 2016 NSPS OOOOa (ICR EPA tracking number 2523.02) was modified to reflect updates to the estimated number of affected facilities according to the 2018 Inventory of U.S. Greenhouse Gas Emissions and Sinks (GHGI) and, for storage vessels, updated activity numbers included in the "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources. Background Technical Support Document for the Proposed Reconsideration of the New Source Performance Standards, 40 CFR Part 60, subpart OOOOa. September 2018." The original 2016 NSPS OOOOa burden did not include the recordkeeping and reporting burden associated with the fugitives program in the bottom line numbers. In the 2016 NSPS ICR updated baseline, the cost and hour burden related to the fugitives program has been included. The 3-year annual average estimated for the 2016 NSPS ICR Updated Baseline was 274,291 hours and \$16,886,648 (\$2016). The annual burden estimated for the 2016 NSPS ICR Updated Baseline is shown in Appendix A.

(*ii*) 2018 NSPS OOOOa Reconsideration Proposal. The 3-year annual average estimated for NSPS OOOOa assuming the 2018 NSPS OOOOa Reconsideration Proposal amendments are finalized was 236,334 hours and \$236,334 (\$2016). This estimate includes the recordkeeping and reporting burden associated with the fugitives program. The annual burden estimated for NSPS OOOOa if only the 2018 NSPS OOOOa Reconsideration Proposal amendments are finalized is shown in Appendix B. In the 2018 NSPS OOOOa Reconsideration Proposal, the EPA proposed amendments to address issues raised in petitions and proposed amendments to provide clarity, streamlining and alignment of requirements leading to an overall burden reduction to the regulated community.

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(*iii*) 2019 NSPS OOOOa EO 13783 Review Proposal. The 3-year annual average estimated for NSPS OOOOa assuming the 2019 NSPS OOOOa EO 13783 Review Proposal amendments are finalized and if the 2018 NSPS OOOOa Reconsideration Proposal amendments are also finalized, is 230,285 labor hours, with an annual average cost of \$14,177,438. The proposed amendments based on a review of the 2018 NSPS OOOOa Reconsideration Program under EO 13783 result in additional reductions in the labor burden hours and costs from what was estimated for the 2018 NSPS OOOOa Reconsideration Proposal. This reduction is attributed to the proposed removal of the transmission and storage segment from the source category and associated affected facility recordkeeping and reporting requirements affecting the following units in years 2019-2021:

- Centrifugal Compressors
- Reciprocating Compressors
- Pneumatic Controllers

In the absence of changes associated with the 2019 NSPS OOOOa EO 13783 Review Proposal amendments, the EPA estimated that the number of new affected units in the transmission and storage segment would have been subject to recordkeeping and reporting requirements in the 3-year period between 2019 and 2021. These estimates are presented below.

Source	Number of New A	Number of New Affected Facilities per year in Transmission and Storage ^{a, b, c}					
Source	Year 1 (2019)	Year 2 (2020)	Year 3 (2021)				
Centrifugal Compressors	90	108	126				
Reciprocating Compressors	380	456	532				
Pneumatic Controllers	308	308	308				
Total Labor Hours	3,588	3,951	4,315				
Total Labor Cost (\$2016)	\$220,894	\$243,267	\$265,639				

^aThe number of new affected facilities per year obtained from the memorandum entitled "Draft Estimate of New Sources Affected for purposes of the Information Collection Request under the Proposed Amendments to 40 CFR Part 60, Subpart OOOOa" (Appendix D).

^bAs year 2015 as the starting point, it is estimated that 18 new centrifugal compressors, 76 reciprocating compressors, and 308 pneumatic controllers in the transmission and storage segment will be affected annually. ^cRecordkeeping and reporting activities for controllers are assumed to be a one-time occurrence per controller and not a repeated annual activity.

Because the 2019 NSPS OOOOa EO 13783 Review Proposal amendments would remove the transmission and storage segment from the source category, labor hours and costs associated with the current requirements that apply to centrifugal compressors, reciprocating compressors, and pneumatic controllers that are present in the transmission and storage segment would be eliminated.

3-year Annual Average (2019-2021)								
3-year Annual Average (2019-2021)	2016 NSPS OOOOa Updated Baseline	2019 NSPS OOOOa EO 13783 Proposal Only	2018 NSPS OOOOa Proposal Only	2018 NSPS OOOOa Proposal + 2019 NSPS OOOOa EO 13783 Proposal				
Average Labor Hours	274,491	267,718	236,334	230,285				
Average Labor Costs (\$2016)								
C	Updated Baseline	2%						
% Reduction from	OOOOa Proposal	16%						

As the above table shows, , the 2019 NSPS OOOOa EO 13783 Review Proposal represents a 2 percent burden reduction compared to the updated 2016 NSPS OOOOa baseline.^a This burden reduction equates to an overall reduction of 6,773 average annual labor hours and represents a decrease in average total annual respondent burden cost for reporting and recordkeeping of \$404,689 (\$2016) in the 3-year average. The 2019 NSPS OOOOa EO 13783 Review Proposal in combination with the 2018 NSPS OOOOa proposal represents a burden reduction of 16 percent compared to the 2016 Updated Baseline. This burden reduction equates to an overall reduction of 44,206 average annual labor hours and represent a cost decrease on average of \$2,709,210.

(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 49 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing

^a The updated baseline reflects updates to the estimated number of affected facilities according to the 2018 Inventory of U.S. Greenhouse Gas Emissions and Sinks (GHGI) and, for storage vessels, updated activity numbers included in the "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources. Background Technical Support Document for the Proposed Reconsideration of the New Source Performance Standards, 40 CFR Part 60, subpart OOOOa. September 2018".

information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2017-0757. An electronic version of the public docket is available at http://www.regulations.gov/ which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in EPA Docket Center (EPA/DC), EPA WJC West Building, Room 3334, 1301 Constitution Ave., NW, Washington, DC. EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Enforcement and Compliance Docket and Information Center is (202) 566-1742. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include EPA Docket ID Number EPA-HQ-OAR-2017-0757 in any correspondence.

PART B

This section is not applicable because statistical methods are not used in data collection associated with the final rule.

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Burden of NSPS OOOOa if Both the 2018 NSPS OOOOa Reconsideration Proposal + 2019 NSPS OOOOa EO 13783 Review Proposal Amendments are Finalized Table 1a. Year 1 Respondent Burden of Reporting and Recordkeeping Requirements

Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced

	(A)	(B)	FR part 60, su (C)	(D)	(E)	(F)	(G)	(H)
		Number of			Technical	Managerial		
Year	Person-Hours	Occurrences	Person-Hours	Respondents	Person-Hours	Person-Hours	Clerical Person- Hours per Year	Cost per Ye
	per Occurrence	per Respondent	per Respondent per Year (A*B)	per Year	per Year	per Year	(0.10*E)	Cost per 10
		per Year	per rea (rr b)		(C*D)	(0.05*E)	(0.10 E)	
APPLICATIONS (Not Applicable)								
SURVEY AND STUDIES (Not Applicable)								
ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNO	DLOGY AND SYS	STEMS (Not App	olicable)					
REPORT REQUIREMENTS			· · · · · · · · · · · · · · · · · · ·					
A. Read Instructions/Rule								
New Affected Facilities	2	1	2	3,428	6,856	343	686	\$485,40
B. Required Activities								
Notification of Well Completion/Recompletion	0.25	10	2.5	2,328	5,820	291	582	\$412,05
Notification of Construction/Reconstruction/Modification	0.5	1	0.5	8	4	0	0	\$283
C. Create Information (Included in 5C)								
D. Gather Existing Information (Included in 5C)								
E. Annual Reports								
Well Completion/Recompletion	1	1	1	2,328	2,328	116	233	\$164,82
Centrifugal Compressor (Wet seal)	3	1	3	40	120	6	12	\$8,496
Reciprocating Compressor	1.5	1	2	2,110	3,165	158	317	\$224,08
Pneumatic Controllers	1	1	1	1,234	1,234	62	123	\$87,366
Pneumatic Pumps	2	1	2	2,168	4,336	217	434	\$306,98
Storage Vessel	2	1	2	2,433	4,866	243	487	\$344,51
Well Site (Fugitives)	4	1	4	2,328	9,312	466	931	\$659,28
Compressor Station (Fugitives)	4	1	4	1,060	4,240	212	424	\$300,18
Sweetening Units	4	1	4	5	20	1	2	\$1,416
F. Semiannual Reports		-		5		-	-	\$1,110
Gas Processing Plant	24	2	48	35	1,680	84	168	\$118,94
Gus i rocessing i laik	24	-	40	55	43,981	2,199	4,398	
Reporting Requirement Subtotal					.0,002	50,578	.,	\$3,113,82
RECORDKEEPING REQUIREMENTS					•			
A. Read Instructions (Included in 4A)								
B. Plan Activities (Included in 4B)								
C. Implement Activities								
Maintain completion log records	0.5	10	5	2,328	11,640	582	1,164	\$824,10
Maintain 300 GOR exemption records	1	1	1	2,328	2,328	116	233	\$164,82
Centrifugal Compressor (Wet seal)	4	1	4	40	160	8	16	\$11,328
Reciprocating Compressor (Rod Packing Change)	1	1	1	2,110	2,110	106	211	\$149,38
Reciprocating Compressor (Route to Process)	2	1	2	0	0	0	0	\$0
Pneumatic controllers	4	1	4	1,234	4,936	247	494	\$349,46
Pneumatic pumps (uncontrolled)	1	1	1	542	542	27	54	\$38,373
Pneumatic pumps (controlled)	1	1	1	1,626	1,626	81	163	\$115,12
Storage Vessels	2	1	2	43,321	86,642	4,332	8,664	\$6,134,2
Fugitive Emissions - Well Sites	1	8	8	2,328	18,624	931	1,862	\$1,318,5
Compressor Station (Fugitives)	1	2	2	1,060	2,120	106	212	\$150,09
Processing Plants	8	4	32	35	1,120	56	112	\$79,295
Sweetening Units	4	1	4	5	20	1	2	\$1,416
D. Record Data (Included in 5C)			<u> </u>	,			-	\$1,.10
E. Time to Transmit or Disclose Information								
Records required by standards (Included in 4E)								
F. Train Personnel (Included in 5C)			<u> </u>					
G. Time for Audits (Not Applicable)								
S. Time for Autors (not Appliedble)	1	1	I		131,868	6,593	13 107	
Recordkeeping Requirement Subtotal					131,000	151,648	13,187	\$9,336,1
					175,849	8,792	17,585	

Assumptions: • 8 new centrifugal compressors equipped with wet seals will become affected each year (2018 GHGI).

422 recipation of the compressors will become affected each year. All will comply by changing the rod packing rather than routing to a process (2018 GHGI).
 1,234 new pneumatic controllers will become affected facilities each year (2018 GHGI).

1,234 new pneumatic controllers will become affected facilities each year (2018 GHG).
4,336 new pneumatic pumps per year (2018 GHG). 50% are diaphragm pumps and affected faciklities year and 75% will be controlled (2018 TSD, page 92-93).
9,597 new storage vessels per year (estimated based on average increase in new storage vessels 2019-2021).
7 new processing plants will become affected each year.
1 new sweetening facility will become affected each year.

Burden of NSPS OOOOa if Both the 2018 NSPS OOOOa Reconsideration Proposal + 2019 NSPS OOOOa EO 13783 Review Proposal Amendments are Finalized Table 1b. Year 2 Respondent Burden of Reporting and Recordkeeping Requirements Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced

nuarus oi	Periorinance I	or Crude	On and	Naturai	Gas	Facilities for	which	Consti	ruction	, Mounication,	or Reconst	ruction (COUNT
								~ .					

				part 0000				
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
Year	D	Number of	Person-Hours	Describert	Technical	Managerial	Clerical Person	
rear	Person-Hours	Occurrences per Respondent	per Respondent	Respondents per Year	Person-Hours per Year	Person-Hours per Year	Hours per Year	Cost per Ye
	per occurrence	per Year	per Year (A*B)	per rear	(C*D)	(0.05*E)	(0.10*E)	
. APPLICATIONS (Not Applicable)					(0 -)	(0000 1)		
. SURVEY AND STUDIES (Not Applicable)								
ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNO	LOGY AND SYS	TEMS (Not App	licable)					
. REPORT REQUIREMENTS								
A. Read Instructions/Rule								
New Affected Facilities	2	1	2	3,648	7,296	365	730	\$516,552
B. Required Activities								
Notification of Well Completion/Recompletion	0.25	10	2.5	2,328	5,820	291	582	\$412,053
Notification of Construction/Reconstruction/Modification	0.5	1	0.5	8	4	0	0	\$283
C. Create Information (Included in 5C)								
D. Gather Existing Information (Included in 5C)								
E. Annual Reports								
Well Completion/Recompletion	1	1	1	2,328	2,328	116	233	\$164,821
Centrifugal Compressor (Wet seal)	3	1	3	48	144	7	14	\$10,195
Reciprocating Compressor	1.5	1	2	2,532	3,798	190	380	\$268,89
Pneumatic Controllers	1	1	1	1,234	1,234	62	123	\$87,366
Pneumatic Pumps	2	1	2	2,168	4,336	217	434	\$306,98
Storage Vessel	2	1	2	2,433	4,866	243	487	\$344,51
Well Site (Fugitives)	4	1	4	2,328	9,312	466	931	\$659,284
Compressor Station (Fugitives)	4	1	4	1,272	5,088	254	509	\$360,22
Sweetening Units	4	1	4	6	24	1	2	\$1,699
F. Semiannual Reports	4	1	4	0	24	1	2	\$1,055
Gas Processing Plant	24	2	48	42	2,016	101	202	\$142,73
Gus i rocessing i func	24	2	40	42	46,266	2,313	4,627	
Reporting Requirement Subtotal					10,200	53,206	1,027	\$3,275,60
. RECORDKEEPING REQUIREMENTS						00,200		
A. Read Instructions (Included in 4A)						1	1	
B. Plan Activities (Included in 4B)								
C. Implement Activities								
Maintain completion log records	0.5	10	5	2,328	11,640	582	1,164	\$824,10
Maintain 300 GOR exemption records	1	10	1	2,328	2,328	116	233	\$164,821
Centrifugal Compressor (Wet seal)	4	1	4	48	192	110	19	\$13,593
Reciprocating Compressor (Rod Packing Change)	1	1	1	2,532	2,532	127	253	\$179,264
Reciprocating Compressor (Route to Process)	2	1	2	0	0	0	0	\$0
Pneumatic controllers	4	1	4	1,234	4,936	247	494	\$349,46
Pneumatic pumps (uncontrolled)	1	1	1	542	542	27	54	\$38,373
Pneumatic pumps (controlled)	1	1	1	1,626	1,626	81	163	\$115,120
Storage Vessels	2	1	2	53,696	107,392	5,370	10,739	\$7,603,28
Fugitive Emissions - Well Sites	1	8	8	2,328	18,624	931	1,862	\$1,318,56
Compressor Station (Fugitives)	1	2	2	1,272	2,544	127	254	\$1,310,30
Processing Plants	8	4	32	42	1,344	67	134	\$95,154
Sweetening Units	4	4	4	6	24	1	2	\$1,699
D. Record Data (Included in 5C)		1		0	24	1	2	φ1,033
E. Time to Transmit or Disclose Information	+						<u> </u>	
Records required by standards (Included in 4E)	+							
F. Train Personnel (Included in 5C)								
G. Time for Audits (Not Applicable)					152 724	7.000	15 373	
Recordkeeping Requirement Subtotal					153,724	7,686 176,783	15,372	\$10,883,5
					199,990	10,000	19,999	

Assumptions:

• 8 new centrifugal compressors equipped with wet seals will become affected each year (2018 GHGI).

422 reciprociting compressors will become affected each year. All will comply by changing the rod packing rather than routing to a process (2018 GHGI).
 1,234 new pneumatic controllers will become affected facilities each year (2018 GHGI).

• 4,336 new pneumatic pumps per year (2018 GHGI). 50% are diaphragm pumps and affected faciklities year and 75% will be controlled (2018 TSD, page 92-93).

• 10,375 new storage vessels per year (estimated based on average increase in new storage vessels 2019-2021).

7 new processing plants will become affected each year.
1 new sweetening facility will become affected each year.

Burden of NSPS OOOOa if Both the 2018 NSPS OOOOa Reconsideration Proposal + 2019 NSPS OOOOa EO 13783 Review Proposal Amendments are Finalized Table 1c. Year 3 Respondent Burden of Reporting and Recordkeeping Requirements d Standa

lards of Performance for Crude Oil and Natural Gas Facilitie	s for which Construction, Modification, or Reconstruction Commenced
ofter September 18, 2015 (A	0 CEP part 60 subpart OOOOa)

after	September 18	3, 2015 (40 CF	R part 60, sub	part 0000a)			
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
		Number of	Person-Hours		Technical	Managerial	Clerical Person-	
Year	Person-Hours	Occurrences	per Respondent	Respondents	Person-Hours	Person-Hours	Hours per Year	Cost per Yea
	per Occurrence	per Respondent per Year	per Year (A*B)	per Year	per Year (C*D)	per Year (0.05*E)	(0.10*E)	
1. APPLICATIONS (Not Applicable)		per Year			(C+D)	(0.05*E)		
2. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNO	LOGY AND SYST	EMS (Not Appli	cable)					
4. REPORT REQUIREMENTS		- (· · · II						
A. Read Instructions/Rule								
New Affected Facilities	2	1	2	3,868	7,736	387	774	\$547,704
B. Required Activities			_	0,000	.,			40
Notification of Well Completion/Recompletion	0.25	10	2.5	2,328	5,820	291	582	\$412,053
Notification of Construction/Reconstruction/Modification	0.5	1	0.5	8	4	0	0	\$283
C. Create Information (Included in 5C)								
D. Gather Existing Information (Included in 5C)								
E. Annual Reports								
Well Completion/Recompletion	1	1	1	2,328	2,328	116	233	\$164,821
Centrifugal Compressor (Wet seal)	3	1	3	56	168	8	17	\$11,894
Reciprocating Compressor	1.5	1	2	2,954	4,431	222	443	\$313,712
Pneumatic Controllers	1	1	1	1,234	1,234	62	123	\$87,366
Pneumatic Pumps	2	1	2	2,168	4,336	217	434	\$306,986
Storage Vessel	2	1	2	2,433	4,866	243	487	\$344,510
Well Site (Fugitives)	4	1	4	2,328	9,312	466	931	\$659,284
Compressor Station (Fugitives)	4	1	4	1,484	5,936	297	594	\$420,265
Sweetening Units	4	1	4	7	28	1	3	\$1,982
F. Semiannual Reports	· ·	-		,	20	-	5	\$1,00L
Gas Processing Plant	24	2	48	49	2,352	118	235	\$166,520
ous rioccosing rand		-	10	10	48,551	2,428	4,855	
Reporting Requirement Subtotal						55,834		\$3,437,382
5. RECORDKEEPING REQUIREMENTS								
A. Read Instructions (Included in 4A)								
B. Plan Activities (Included in 4B)								
C. Implement Activities								
Maintain completion log records	0.5	10	5	2,328	11,640	582	1,164	\$824,105
Maintain 300 GOR exemption records	1	1	1	2,328	2,328	116	233	\$164,821
Centrifugal Compressor (Wet seal)	4	1	4	56	224	11	22	\$15,859
Reciprocating Compressor (Rod Packing Change)	1	1	1	2,954	2,954	148	295	\$209,141
Reciprocating Compressor (Route to Process)	2	1	2	0	0	0	0	\$0
Pneumatic controllers	4	1	4	1,234	4,936	247	494	\$349,466
Pneumatic pumps (uncontrolled)	1	1	1	542	542	27	54	\$38,373
Pneumatic pumps (controlled)	1	1	1	1,626	1,626	81	163	\$115,120
Storage Vessels	2	1	2	64,458	128,916	6,446	12,892	\$9,127,175
Fugitive Emissions - Well Sites	1	8	8	2,328	18,624	931	1,862	\$1,318,568
Compressor Station (Fugitives)	1	2	2	1,484	2,968	148	297	\$210,133
Processing Plants	8	4	32	49	1,568	78	157	\$111,013
Sweetening Units	4	1	4	7	28	1	3	\$1,982
D. Record Data (Included in 5C)	1	-				-		4-,0 <i>0</i>
E. Time to Transmit or Disclose Information	1	1	1					
Records required by standards (Included in 4E)								
F. Train Personnel (Included in 5C)								
G. Time for Audits (Not Applicable)								
· · · · ·	1	1			176,354	8,818	17,635	
Recordkeeping Requirement Subtotal					1/0,334	202,807	17,000	\$12,485,75
					224,905	11,245	22,491	

Assumptions:

48 new centrifugal compressors equipped with wet seals will become affected each year (2018 GHGI).
422 reciprocating compressors will become affected each year. All will comply by changing the rod packing rather than routing to a process (2018 GHGI).
1,234 new pneumatic controllers will become affected facilities each year (2018 GHGI).

• 4,336 new pneumatic pumps per year (2018 GHGI). 50% are diaphragm pumps and affected faciklities year and 75% will be controlled (2018 TSD, page 92-93).

• 10,762 new storage vessels per year (estimated based on average increase in new storage vessels 2019-2021).

7 new processing plants will become affected each year.
1 new sweetening facility will become affected each year.

Table 1d. Three-Year Average Respondent Burden of Reporting and Recordkeeping Requirements Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015 (40 CFR part 60, subpart OOOOa)

Year	Total Respondents	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours	Labor Cost
1	3,428	175,849	8,792	17,585	202,226	\$12,450,004
2	3,648	199,990	10,000	19,999	229,989	\$14,159,172
3	3,868	224,905	11,245	22,491	258,641	\$15,923,139
Total	10,944	600,744	30,037	60,074	690,856	\$42,532,315
Average	3,648	200,248	10,012	20,025	230,285	\$14,177,438

Number of respondents in Year 1 is based on 2,328 exploration and production businesses, 1,060 G&B compressor stations, 35 processing plants, and 5 sweetening units.

Number of respondents in Year 2 is based on 2,328 exploration and production businesses, 1,272 G&B compressor stations, 42 processing plants, and 6 sweetening units.

Number of respondents in Year 3 is based on 2,328 exploration and production businesses, 1,484 G&B compressor stations, 49 processing plants, and 7 sweetening units.

Burden of NSPS OOOOa if Both the 2018 NSPS OOOOa Reconsideration Proposal + 2019 NSPS OOOOa EO 13783 Review Proposal Amendments are Finalized Table 2a. Year 1 Annual Burden and Cost to the Federal Government

Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced

after September 18, 2015 (40 CFR part 60, subpart OOOOa)

TOTAL ANNUAL BURDEN						15,934		\$739,910
TOTAL ANNUAL DUDDEN					13,856	693	1,386	\$720.010
Semiannual Report	4	2	8	35	280	14	28	\$14,952
Annual Report	4	1	4	3,393	13,572	679	1,357	\$724,745
Notification of Construction/Reconstruction/Modification	0.5	1	0.5	8	4	0	0	\$214
Report Review								
Activity			(C=AxB)				(Ex0.1)	
		per year	year		(E=CxD)	(Ex0.05)	year	
	occurrence	per plant	plant per	year	per year	per year	hours per	
	hours per	occurrences	hours per	per	person-hours	person-hours	person-	
	EPA person-	No. of	EPA person-	Responses	Technical	Management	Clerical	Cost (\$) ^a
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)

^a The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rate of \$64.16 (GS-13, Step 5, \$40.10 × 1.6), Technical rate of \$47.62 (GS-12, Step 1, \$29.76 × 1.6), and Clerical rate of \$25.76 (GS-6, Step 3, \$16.10 × 1.6). These rates are from the Office of Personnel Management (OPM), 2016 General Schedule, which excludes locality rates of pay.

Burden of NSPS OOOOa if Both the 2018 NSPS OOOOa Reconsideration Proposal + 2019 NSPS OOOOa EO 13783 Review Proposal Amendments are Finalized Table 2b. Year 2 Annual Burden and Cost to the Federal Government

Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced

after September 18, 2015 (40 CFR part 60, subpart OOOOa)

	and Septe	mbci 10, 201	5 (40 CFR pai	t oo, subpart	0000a)			
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-	No. of	EPA person-	Responses	Technical	Management	Clerical	Cost (\$) ^a
	hours per	occurrences	hours per	per	person-hours	person-hours	person-	
	occurrence	per plant	plant per	year	per year	per year	hours per	
		per year	year		(E=CxD)	(Ex0.05)	year	
Activity			(C=AxB)				(Ex0.1)	
Report Review								
Notification of Construction/Reconstruction/Modification	0.5	1	0.5	8	4	0	0	\$214
Annual Report	4	1	4	3,606	14,424	721	1,442	\$770,242
Semiannual Report	4	2	8	42	336	17	34	\$17,942
TOTAL ANNUAL BURDEN					14,764	738	1,476	\$788,398
IOTAL ANNUAL BURDEN						16,979		\$700,390

^a The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rate of \$64.16 (GS-13, Step 5, \$40.10 × 1.6), Technical rate of \$47.62 (GS-12, Step 1, \$29.76 × 1.6), and Clerical rate of \$25.76 (GS-6, Step 3, \$16.10 × 1.6). These rates are from the Office of Personnel Management (OPM), 2016 General Schedule, which excludes locality rates of pay.

Burden of NSPS 0000a if Both the 2018 NSPS 0000a Reconsideration Proposal + 2019 NSPS 0000a EO 13783 Review Proposal Amendments are Finalized Table 2c. Year 3 Annual Burden and Cost to the Federal Government Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced

	after Septe	ember 18, 201	5 (40 CFR par	t 60, subpart	0000a)			
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-	No. of	EPA person-	Responses	Technical	Management	Clerical	Cost (\$) ^a
	hours per	occurrences	hours per	per	person-hours	person-hours	person-	
	occurrence	per plant	plant per	year	per year	per year	hours per	
		per year	year		(E=CxD)	(Ex0.05)	year	
Activity			(C=AxB)				(Ex0.1)	
Report Review								
Notification of Construction/Reconstruction/Modification	0.5	1	0.5	8	4	0	0	\$214
Annual Report	4	1	4	3,819	15,276	764	1,528	\$815,738
Semiannual Report	4	2	8	49	392	20	39	\$20,933
TOTAL ANNUAL BURDEN					15,672	784	1,567	\$836,885
IOTAL ANNUAL BURDEN						18,023		\$030,000

^a The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rate of \$64.16 (GS-13, Step 5, \$40.10 × 1.6), Technical rate of \$47.62 (GS-12, Step 1, \$29.76 × 1.6), and Clerical rate of \$25.76 (GS-6, Step 3, \$16.10 × 1.6). These rates are from the Office of Personnel Management (OPM), 2016 General Schedule, which excludes locality rates of pay.

Burden of NSPS OOOOa if Both the 2018 NSPS OOOOa Reconsideration Proposal + 2019 NSPS OOOOa EO 13783 Review Proposal Amendments are Finalized Table 2d. Three-Year Average Annual Burden and Cost to the Federal Government Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015 (40 CFR part 60, subpart OOOOa)

Year	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours	Labor Cost
1	13,856	1,386	693	15,934	739,910
2	14,764	1,476	738	16,979	788,398
3	15,672	1,567	784	18,023	836,885
Total	44,292	4,429	2,215	50,936	\$2,365,193
Average	14,764	1,476	738	16,979	\$788,398

Appendix A

Updated ICR Burden of 2016 NSPS OOOOa

			CFR part 60, sub		(7)	(7)	(0)	an b
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
Year	Person-Hours per Occurrence	Number of Occurrences per Respondent per Year	Person-Hours per Respondent per Year (A*B)	Respondents per Year	Technical Person- Hours per Year (C*D)	Managerial Person- Hours per Year (0.05*E)	Clerical Person- Hours per Year (0.10*E)	Cost per Yea
APPLICATIONS (Not Applicable)								
SURVEY AND STUDIES (Not Applicable)								
ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOI	LOGY AND SYSTEM	S (Not Applicable)						
. REPORT REQUIREMENTS								
A. Read Instructions								
New Affected Facilities	2	1	2	3,618	7,236	362	724	\$512,304
B. Required Activities								
Notification of Well Completion/Recompletion	0.25	10	2.5	2,328	5,820	291	582	\$412,053
Notification of Construction/Reconstruction/Modification	0.5	1	0.5	8	4	0	0	\$283
C. Create Information (Included in 5C)								
D. Gather Existing Information (Included in 5C)								
E. Annual Reports								
Well Completion/Recompletion	1	1	1	2,328	2,328	116	233	\$164,821
Centrifugal Compressor (Wet seal)	3	1	3	130	390	20	39	\$27,612
Reciprocating Compressor	1.5	1	2	2,490	3,735	187	374	\$264,436
Pneumatic Controllers	1	1	1	1,542	1,542	77	154	\$109,173
Pneumatic Pumps	2	1	2	2,168	4,336	217	434	\$306,986
Storage Vessel	2	1	2	2,433	4,866	243	487	\$344,510
Well Site (Fugitives)	4	1	4	2,328	9,312	466	931	\$659,284
Compressor Station (Fugitives)	4	1	4	1,250	5,000	250	500	\$353,997
Sweetening Unit	4	1	4	5	20	1	2	\$1,416
F. Semiannual Reports								
Gas Processing Plant	24	2	48	35	1,680	84	168	\$118,943
RECORDKEEPING REQUIREMENTS A. Read Instructions (Included in 4A)						53,209		
B. Plan Activities (Included in 4B)	-							
C. Implement Activities								
	0.5	10	E	2 229	11 640	E92	1 164	\$924.105
Maintain completion log records	0.5	10	5	2,328	11,640	582	1,164	\$824,105
Maintain completion log records Maintain 300 GOR exemption records	1	1	1	2,328	2,328	116	233	\$164,821
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal)	1 4	1	1 4	2,328 130	2,328 520	116 26	233 52	\$164,821 \$36,816
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change)	1 4 1	1 1 1	1 4 1	2,328 130 2,490	2,328 520 2,490	116 26 125	233 52 249	\$164,821 \$36,816 \$176,291
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process)	1 4 1 2	1 1 1 1	1 4 1 2	2,328 130 2,490 0	2,328 520 2,490 0	116 26 125 0	233 52 249 0	\$164,821 \$36,816 \$176,291 \$0
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers	1 4 1 2 4	1 1 1 1 1 1	1 4 1 2 4	2,328 130 2,490 0 1,542	2,328 520 2,490 0 6,168	116 26 125 0 308	233 52 249 0 617	\$164,821 \$36,816 \$176,291 \$0 \$436,691
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled)	1 4 1 2 4 1	1 1 1 1 1 1 1	1 4 1 2 4 1	2,328 130 2,490 0 1,542 542	2,328 520 2,490 0 6,168 542	116 26 125 0 308 27	233 52 249 0 617 54	\$164,821 \$36,816 \$176,291 \$0 \$436,691 \$38,373
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled)	1 4 1 2 4 1 8	1 1 1 1 1 1 1 1 1	1 4 2 4 1 8	2,328 130 2,490 0 1,542 542 1,626	2,328 520 2,490 0 6,168 542 13,008	116 26 125 0 308 27 650	233 52 249 0 617 54 1,301	\$164,821 \$36,816 \$176,291 \$0 \$436,691 \$38,373 \$920,959
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels	1 4 1 2 4 1 8 2	1 1 1 1 1 1 1 1 1 1 1	1 4 2 4 1 8 2	2,328 130 2,490 0 1,542 542 1,626 43,321	2,328 520 0 6,168 542 13,008 86,642	116 26 125 0 308 27 650 4,332	233 52 249 0 617 54 1,301 8,664	\$164,821 \$36,816 \$176,291 \$0 \$436,691 \$38,373 \$920,959 \$6,134,202
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites	1 4 2 4 1 8 2 1 1	1 1 1 1 1 1 1 1 1 1 1 1 6	1 4 1 2 4 1 8 2 16	2,328 130 2,490 0 1,542 542 1,626 43,321 2,328	2,328 520 2,490 0 6,168 542 13,008 86,642 37,248	116 26 125 0 308 27 650 4,332 1,862	233 52 249 0 617 54 1,301 8,664 3,725	\$164,821 \$36,816 \$176,291 \$0 \$436,691 \$38,373 \$920,959 \$6,134,202 \$2,637,136
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations	1 4 2 4 1 8 8 2 1 1	1 1 1 1 1 1 1 1 16 4	1 4 2 4 1 8 2 16 4	2,328 130 2,490 0 1,542 1,626 43,321 2,328 1,250	2,328 520 2,490 0 6,168 542 13,008 86,642 37,248 5,000	116 26 125 0 308 27 650 4,332 1,862 250	233 52 249 0 617 54 1,301 8,664 3,725 500	\$164,821 \$36,816 \$176,291 \$0 \$436,691 \$38,373 \$920,959 \$6,134,202 \$2,637,136 \$353,997
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Rod Packing Change) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants	1 4 2 4 1 8 2 1 1 1 8 8	1 1 1 1 1 1 1 1 1 6 4 4	1 4 1 2 4 1 8 2 16 4 32	2,328 130 2,490 0 1,542 542 1,626 43,321 2,328 1,250 35	2,328 520 2,490 0 6,168 542 13,008 86,642 37,248 5,000 1,120	116 26 125 0 308 27 650 4,332 1,862 250 56	233 52 249 0 617 54 1,301 8,664 3,725 500 112	\$164,821 \$36,816 \$176,291 \$0 \$436,691 \$38,373 \$920,959 \$6,134,202 \$2,637,136 \$353,997 \$79,295
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Preumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units	1 4 2 4 1 8 8 2 1 1	1 1 1 1 1 1 1 1 16 4	1 4 2 4 1 8 2 16 4	2,328 130 2,490 0 1,542 1,626 43,321 2,328 1,250	2,328 520 2,490 0 6,168 542 13,008 86,642 37,248 5,000	116 26 125 0 308 27 650 4,332 1,862 250	233 52 249 0 617 54 1,301 8,664 3,725 500	\$164,821 \$36,816 \$176,291 \$0 \$436,691 \$38,373 \$920,959 \$6,134,202 \$2,637,136 \$353,997
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Poreuratic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units D. Record Data (Included in 5C)	1 4 2 4 1 8 2 1 1 1 8 8	1 1 1 1 1 1 1 1 1 6 4 4	1 4 1 2 4 1 8 2 16 4 32	2,328 130 2,490 0 1,542 542 1,626 43,321 2,328 1,250 35	2,328 520 2,490 0 6,168 542 13,008 86,642 37,248 5,000 1,120	116 26 125 0 308 27 650 4,332 1,862 250 56	233 52 249 0 617 54 1,301 8,664 3,725 500 112	\$164,821 \$36,816 \$176,291 \$0 \$436,691 \$38,373 \$920,959 \$6,134,202 \$2,637,136 \$353,997 \$79,295
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Rod Packing Change) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information	1 4 2 4 1 8 2 1 1 1 8 8	1 1 1 1 1 1 1 1 1 6 4 4	1 4 1 2 4 1 8 2 16 4 32	2,328 130 2,490 0 1,542 542 1,626 43,321 2,328 1,250 35	2,328 520 2,490 0 6,168 542 13,008 86,642 37,248 5,000 1,120	116 26 125 0 308 27 650 4,332 1,862 250 56	233 52 249 0 617 54 1,301 8,664 3,725 500 112	\$164,821 \$36,816 \$176,291 \$0 \$436,691 \$38,373 \$920,959 \$6,134,202 \$2,637,136 \$353,997 \$79,295
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Rod Packing Change) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E)	1 4 2 4 1 8 2 1 1 1 8 8	1 1 1 1 1 1 1 1 1 6 4 4	1 4 1 2 4 1 8 2 16 4 32	2,328 130 2,490 0 1,542 542 1,626 43,321 2,328 1,250 35	2,328 520 2,490 0 6,168 542 13,008 86,642 37,248 5,000 1,120	116 26 125 0 308 27 650 4,332 1,862 250 56	233 52 249 0 617 54 1,301 8,664 3,725 500 112	\$164,821 \$36,816 \$176,291 \$0 \$436,691 \$38,373 \$920,959 \$6,134,202 \$2,637,130 \$353,997 \$79,295
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (uncontrolled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Well Sites Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records produced in 4E) F. Train Personnel (Included in 5C)	1 4 2 4 1 8 2 1 1 1 8 8	1 1 1 1 1 1 1 1 1 6 4 4	1 4 1 2 4 1 8 2 16 4 32	2,328 130 2,490 0 1,542 542 1,626 43,321 2,328 1,250 35	2,328 520 2,490 0 6,168 542 13,008 86,642 37,248 5,000 1,120	116 26 125 0 308 27 650 4,332 1,862 250 56	233 52 249 0 617 54 1,301 8,664 3,725 500 112	\$164,821 \$36,816 \$176,291 \$0 \$436,691 \$38,373 \$920,959 \$6,134,202 \$2,637,130 \$353,997 \$79,295
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Rod Packing Change) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E)	1 4 2 4 1 8 2 1 1 1 8 8	1 1 1 1 1 1 1 1 1 6 4 4	1 4 1 2 4 1 8 2 16 4 32	2,328 130 2,490 0 1,542 542 1,626 43,321 2,328 1,250 35	2,328 520 2,490 0 6,168 542 13,008 86,642 37,248 5,000 1,120 20	116 26 125 0 308 27 650 4,332 1,862 250 56 1	233 52 249 0 617 54 1,301 8,664 3,725 500 112 2	\$164,821 \$36,816 \$176,291 \$0 \$436,691 \$38,373 \$920,959 \$6,134,202 \$2,637,136 \$353,997 \$79,295
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (uncontrolled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Well Sites Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records produced in 4E) F. Train Personnel (Included in 5C)	1 4 2 4 1 8 2 1 1 1 8 8	1 1 1 1 1 1 1 1 1 6 4 4	1 4 1 2 4 1 8 2 16 4 32	2,328 130 2,490 0 1,542 542 1,626 43,321 2,328 1,250 35	2,328 520 0 6,168 542 13,008 86,642 37,248 5,000 1,1,20 20	116 26 125 0 308 27 650 4,332 1,862 250 56 1 	233 52 249 0 617 54 1,301 8,664 3,725 500 112 2 2 16,673	\$164,821 \$36,816 \$176,291 \$0 \$436,691 \$38,373 \$920,959 \$6,134,202 \$2,637,136 \$353,997 \$79,295
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Ptorage (uncontrolled) Storage Vessels Fugitive Emissions - Vell Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units D. Record Data (Included in 5C) F. Train Personnel (Included in 5C) G. Time for Audits (Not Applicable)	1 4 2 4 1 8 2 1 1 1 8 8	1 1 1 1 1 1 1 1 1 6 4 4	1 4 1 2 4 1 8 2 16 4 32	2,328 130 2,490 0 1,542 542 1,626 43,321 2,328 1,250 35	2,328 520 2,490 0 6,168 542 13,008 86,642 37,248 5,000 1,120 20	116 26 125 0 308 27 650 4,332 1,862 250 56 1 	233 52 249 0 617 54 1,301 8,664 3,725 500 112 2	\$164,821 \$36,816 \$176,291 \$0 \$436,691 \$8436,91 \$8446,91 \$8466,91 \$84666,91 \$846

2016 NSPS OOOOa - Updated Baseline Table 1a. Year 1 Respondent Burden of Reporting and Recordkeeping Requirements Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced

	after Septemb	er 18, 2015 (40 C	FR part 60, sub	art OOOOa)				
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
		Number of	Person-Hours per		Technical Person-	Managerial	Clerical Person-	
Year	Person-Hours per	Occurrences per	Respondent per	Respondents per	Hours per Year	Person-Hours	Hours per Year	Cost per Year
	Occurrence	Respondent per	Year (A*B)	Year	(C*D)	per Year (0.05*E)	(0.10*E)	
. APPLICATIONS (Not Applicable)		Year				(0.05*E)		
P. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOG	V AND SVSTEMS (Not	Applicable)						
4. REPORT REQUIREMENTS	TAND STSTEMS (NOT.	Аррисане)						
A. Read Instructions					1	1	1 1	
New Affected Facilities	2	1	2	3,876	7,752	388	775	\$548,837
B. Required Activities	2	1	2	3,070	7,732	300	115	\$340,037
Notification of Well Completion/Recompletion	0.25	10	2.5	2,328	5,820	291	582	\$412,053
Notification of Construction/Reconstruction/Modification	0.5	10	0.5	8	4	0	0	\$283
C. Create Information (Included in 5C)	0.0		0.0	0		0	, , , , , , , , , , , , , , , , , , ,	\$200
D. Gather Existing Information (Included in 50)								
E. Annual Reports								
Well Completion/Recompletion	1	1	1	2,328	2,328	116	233	\$164,821
Centrifugal Compressor (Wet seal)	3	1	3	156	468	23	47	\$33,134
Reciprocating Compressor	1.5	1	2	2,988	400	23	47	\$317.323
Pneumatic Controllers	1.5	1	1	1,542	1,542	77	154	\$109,173
Pneumatic Pumps	2	1	2	2,168	4,336	217	434	\$306,986
Storage Vessel	2	1	2	2,433	4,866	243	487	\$344,510
Well Site (Fugitives)	4	1	4	2,328	9,312	466	931	\$659,284
Compressor Station (Fugitives)	4	1	4	1,500	6,000	300	600	\$424,796
Sweetening Unit	4	1	4	6	24	1	2	\$1,699
F. Semiannual Reports	4	1	4	0	24	1	2	\$1,035
Gas Processing Plant	24	2	48	42	2,016	101	202	\$142,732
Gas Flocessnig Flan	24	2	40	42	48,950	2,448	4,895	\$142,732
Reporting Requirement Subtotal					40,550	56,293	4,055	\$3,465,631
5. RECORDKEEPING REQUIREMENTS						30,233		
A. Read Instructions (Included in 4A)					1	1	1 1	
B. Plan Activities (Included in 4B)								
C. Implement Activities								
Maintain completion log records	0.5	10	5	2,328	11,640	582	1,164	\$824,105
	1	10	1	2,328	2,328	116	233	\$164,821
Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal)	4	1	4	2,328	624	31	62	\$164,821 \$44,179
Reciprocating Compressor (Red Packing Change)	4	1	4	2,988	2,988	149	299	\$44,179 \$211,549
Reciprocating Compressor (Rout Facking Change)	2	1	2	2,900	2,500	0	0	\$211,349
Pneumatic controllers	4	1	4	1,542	6,168	308	617	\$436,691
Pneumatic controllers Pneumatic pumps (uncontrolled)	1	1	4	542	542	27	54	\$38,373
	8	1	8	1,626	13,008	650	1,301	\$38,373
Pneumatic pumps (controlled) Storage Vessels	2	1	2	53,696	107,392	5,370	1,501	\$7,603,289
Fugitive Emissions - Well Sites	1	16	16	2,328	37,248	1,862		\$2,637,136
Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations	1	4	4	1,500	6,000	300	3,725 600	\$2,637,136 \$424,796
	8	4	32	42	1,344	67		\$95,154
Processing Plants	4	4	32	42 6	24	6/	134 2	\$95,154 \$1,699
Sweetening Units D. Record Data (Included in 5C)	4	1	4	0	24	1	2	\$1,699
· · · · · · · · · · · · · · · · · · ·								
E. Time to Transmit or Disclose Information								
Records required by standards (Included in 4E)	-							
F. Train Personnel (Included in 5C)	-							
G. Time for Audits (Not Applicable)		l			100.000	0.405	10.001	
Recordkeeping Requirement Subtotal					189,306	9,465	18,931	\$13,402,751
						217,702	1	
TOTAL REPORTING AND RECORDKEEPING LABOR AND COST					238,256	11,913	23,826	\$16,868,382
						273,994		.,,

2016 NSPS OOOOa - Updated Baseline Table 1b. Year 2 Respondent Burden of Reporting and Recordkeeping Requirements Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015 (40 CFR part 60, subpart OOOOa)

2016 NSPS OOOOa - Updated Baseline
Table 1c. Year 3 Respondent Burden of Reporting and Recordkeeping Requirements
Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced

			FR part 60, subpar					
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
Year	D	Number of	Person-Hours per	Describerto	Technical	Managerial	Clerical Person-	
fear	Person-Hours per Occurrence	Occurrences per Respondent per	Respondent per	Respondents per Year	Person-Hours per Year	Person-Hours per Year	Hours per Year	Cost per Yea
	Occurrence	Year	Year (A*B)	rea	(C*D)	(0.05*E)	(0.10*E)	
APPLICATIONS (Not Applicable)	I				(=)	(0100 1)	II	
SURVEY AND STUDIES (Not Applicable)								
ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLO	GY AND SYSTEMS (No	ot Applicable)						
REPORT REQUIREMENTS								
A. Read Instructions								
New Affected Facilities	2	1	2	4,134	8,268	413	827	\$585,369
B. Required Activities								
Notification of Well Completion/Recompletion	0.25	10	2.5	2,328	5,820	291	582	\$412,053
Notification of Construction/Reconstruction/Modification	0.5	1	0.5	8	4	0	0	\$283
C. Create Information (Included in 5C)								
D. Gather Existing Information (Included in 5C)								
E. Annual Reports								
Well Completion/Recompletion	1	1	1	2,328	2,328	116	233	\$164,821
Centrifugal Compressor (Wet seal)	3	1	3	182	546	27	55	\$38,656
Reciprocating Compressor	1.5	1	2	3,486	5,229	261	523	\$370,210
Pneumatic Controllers	1	1	1	1,542	1,542	77	154	\$109,173
Pneumatic Pumps	2	1	2	2,168	4,336	217	434	\$306,986
Storage Vessel	2	1	2	2,433	4,866	243	487	\$344,510
Well Site (Fugitives)	4	1	4	2,328	9,312	466	931	\$659,284
Compressor Station (Fugitives)	4	1	4	1,750	7,000	350	700	\$495,596
Sweetening Unit	4	1	4	7	28	1	3	\$1,982
F. Semiannual Reports								
Gas Processing Plant	24	2	48	49	2,352	118	235	\$166,520
Reporting Requirement Subtotal					51,631	2,582	5,163	\$3,655,444
Reporting Requirement Subtotal						59,376		\$3,033,444
RECORDKEEPING REQUIREMENTS								
A. Read Instructions (Included in 4A)								
B. Plan Activities (Included in 4B)								
C. Implement Activities								
•	0.5	10	5	2,328	11,640	582	1,164	\$824,105
C. Implement Activities Maintain completion log records Maintain 300 GOR exemption records	0.5	10 1	5	2,328 2,328	11,640 2,328	582 116	1,164 233	\$824,105 \$164,821
Maintain completion log records								
Maintain completion log records Maintain 300 GOR exemption records	1	1	1	2,328	2,328	116	233	\$164,821
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal)	1 4	1	1 4	2,328 182	2,328 728	116 36	233 73	\$164,821 \$51,542
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change)	1 4 1	1 1 1	1 4 1	2,328 182 3,486	2,328 728 3,486	116 36 174	233 73 349	\$164,821 \$51,542 \$246,807
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process)	1 4 1 2	1 1 1 1	1 4 1 2	2,328 182 3,486 0	2,328 728 3,486 0	116 36 174 0	233 73 349 0	\$164,821 \$51,542 \$246,807 \$0
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers	1 4 1 2 4	1 1 1 1 1 1	1 4 1 2 4	2,328 182 3,486 0 1,542	2,328 728 3,486 0 6,168	116 36 174 0 308	233 73 349 0 617	\$164,821 \$51,542 \$246,807 \$0 \$436,691
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled)	1 4 1 2 4 1	1 1 1 1 1 1 1	1 4 1 2 4 1	2,328 182 3,486 0 1,542 542	2,328 728 3,486 0 6,168 542	116 36 174 0 308 27	233 73 349 0 617 54	\$164,821 \$51,542 \$246,807 \$0 \$436,691 \$38,373 \$920,959
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels	1 4 1 2 4 1 8	1 1 1 1 1 1 1 1	1 4 2 4 1 8	2,328 182 3,486 0 1,542 542 1,626	2,328 728 3,486 0 6,168 542 13,008	116 36 174 0 308 27 650	233 73 349 0 617 54 1,301	\$164,821 \$51,542 \$246,807 \$0 \$436,691 \$38,373 \$920,959 \$9,127,175
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites	1 4 1 2 4 1 8 2 2	1 1 1 1 1 1 1 1 1 1	1 4 2 4 1 8 2	2,328 182 3,486 0 1,542 542 1,626 64,458	2,328 728 3,486 0 6,168 542 13,008 128,916	116 36 174 0 308 27 650 6,446	233 73 349 0 617 54 1,301 12,892	\$164,821 \$51,542 \$246,807 \$0 \$436,691 \$38,373 \$920,959 \$9,127,175 \$2,637,136
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels	1 4 1 2 4 1 8 8 2 1	1 1 1 1 1 1 1 1 1 1 1 1 6	1 4 2 4 1 8 2 16	2,328 182 3,486 0 1,542 542 1,626 64,458 2,328	2,328 728 3,486 0 6,168 542 13,008 128,916 37,248	116 36 174 0 308 27 650 6,446 1,862	233 73 349 0 617 54 1,301 12,892 3,725	\$164,821 \$51,542 \$246,807 \$0 \$436,691 \$38,373 \$920,959 \$9,127,175
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Ned seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants	1 4 2 4 1 8 2 1 1 1 1	1 1 1 1 1 1 1 1 1 6 4	1 4 2 4 1 1 8 2 16 4	2,328 182 3,486 0 1,542 1,626 64,458 2,328 1,750	2,328 728 3,486 0 6,168 542 13,008 128,916 37,248 7,000 1,568	116 36 174 0 308 27 650 6,446 1,862 350	233 73 349 0 617 54 1,301 12,892 3,725 700 157	\$164,821 \$51,542 \$246,807 \$0 \$436,691 \$38,373 \$920,959 \$9,127,175 \$2,637,136 \$495,596 \$111,013
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Racking Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units	1 4 1 2 4 1 8 2 1 1 1 8 8	$ \begin{array}{c} 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\$	1 4 2 4 1 8 2 16 4 32	2,328 182 3,486 0 1,542 542 1,626 64,458 2,328 1,750 49	2,328 728 3,486 0 6,168 542 13,008 128,916 37,248 7,000	116 36 174 0 308 27 650 6,446 1,862 350 78	233 73 349 0 617 54 1,301 12,892 3,725 700	\$164,821 \$51,542 \$246,807 \$0 \$436,691 \$38,373 \$920,959 \$9,127,175 \$2,637,136 \$495,596
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Rod Packing Change) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (uncontrolled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Well Sites Processing Plants Sweetening Units D. Record Data (Included in 5C)	1 4 1 2 4 1 8 2 1 1 1 8 8	$ \begin{array}{c} 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\$	1 4 2 4 1 8 2 16 4 32	2,328 182 3,486 0 1,542 542 1,626 64,458 2,328 1,750 49	2,328 728 3,486 0 6,168 542 13,008 128,916 37,248 7,000 1,568	116 36 174 0 308 27 650 6,446 1,862 350 78	233 73 349 0 617 54 1,301 12,892 3,725 700 157	\$164,821 \$51,542 \$246,807 \$0 \$436,691 \$38,373 \$920,959 \$9,127,175 \$2,637,136 \$495,596 \$111,013
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Rod Packing Change) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Rod Packing Change) Pneumatic controllers Pneumatic controllers Pneumatic pumps (uncontrolled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units D. Record Data (Included in SC) E. Time to Transmit or Disclose Information	1 4 1 2 4 1 8 2 1 1 1 8 8	$ \begin{array}{c} 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\$	1 4 2 4 1 8 2 16 4 32	2,328 182 3,486 0 1,542 542 1,626 64,458 2,328 1,750 49	2,328 728 3,486 0 6,168 542 13,008 128,916 37,248 7,000 1,568	116 36 174 0 308 27 650 6,446 1,862 350 78	233 73 349 0 617 54 1,301 12,892 3,725 700 157	\$164,821 \$51,542 \$246,807 \$0 \$436,691 \$38,373 \$920,959 \$9,127,175 \$2,637,136 \$495,596 \$111,013
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E)	1 4 1 2 4 1 8 2 1 1 1 8 8	$ \begin{array}{c} 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\$	1 4 2 4 1 8 2 16 4 32	2,328 182 3,486 0 1,542 542 1,626 64,458 2,328 1,750 49	2,328 728 3,486 0 6,168 542 13,008 128,916 37,248 7,000 1,568	116 36 174 0 308 27 650 6,446 1,862 350 78	233 73 349 0 617 54 1,301 12,892 3,725 700 157	\$164,821 \$51,542 \$246,807 \$0 \$436,691 \$38,373 \$920,959 \$9,127,175 \$2,637,136 \$495,596 \$111,013
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Rod Packing Change) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (uncontrolled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Well Sites Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E) F. Train Personnel (Included in 5C)	1 4 1 2 4 1 8 2 1 1 1 8 8	$ \begin{array}{c} 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\$	1 4 2 4 1 8 2 16 4 32	2,328 182 3,486 0 1,542 542 1,626 64,458 2,328 1,750 49	2,328 728 3,486 0 6,168 542 13,008 128,916 37,248 7,000 1,568	116 36 174 0 308 27 650 6,446 1,862 350 78	233 73 349 0 617 54 1,301 12,892 3,725 700 157	\$164,821 \$51,542 \$246,807 \$0 \$436,691 \$38,373 \$920,959 \$9,127,175 \$2,637,136 \$495,596 \$111,013
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E)	1 4 1 2 4 1 8 2 1 1 1 8 8	$ \begin{array}{c} 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\$	1 4 2 4 1 8 2 16 4 32	2,328 182 3,486 0 1,542 542 1,626 64,458 2,328 1,750 49	2,328 728 3,486 0 6,168 542 13,008 128,916 37,248 7,000 1,568 28	116 36 174 0 308 27 650 6,446 1,862 350 78 1	233 73 349 0 617 54 1,301 12,892 3,725 700 157 3 3	\$164,821 \$51,542 \$246,807 \$0 \$436,691 \$38,373 \$920,959 \$9,127,175 \$2,637,136 \$495,596 \$111,013
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Rod Packing Change) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (uncontrolled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Well Sites Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E) F. Train Personnel (Included in 5C)	1 4 1 2 4 1 8 2 1 1 1 8 8	$ \begin{array}{c} 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\$	1 4 2 4 1 8 2 16 4 32	2,328 182 3,486 0 1,542 542 1,626 64,458 2,328 1,750 49	2,328 728 3,486 0 6,168 542 13,008 128,916 37,248 7,000 1,568	116 36 174 0 308 27 650 6,446 1,862 350 78 1 1 10,633	233 73 349 0 617 54 1,301 12,892 3,725 700 157	\$164,821 \$51,542 \$246,807 \$0 \$436,691 \$38,373 \$920,959 \$9,127,175 \$2,637,136 \$495,596 \$111,013
Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Rod Packing Change) Reciprocating Compressor (Rodue to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (uncontrolled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Well Sites Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E) F. Train Personnel (Included in 5C) G. Time for Audits (Not Applicable)	1 4 1 2 4 1 8 2 1 1 1 8 8	$ \begin{array}{c} 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\$	1 4 2 4 1 8 2 16 4 32	2,328 182 3,486 0 1,542 542 1,626 64,458 2,328 1,750 49	2,328 728 3,486 0 6,168 542 13,008 128,916 37,248 7,000 1,568 28	116 36 174 0 308 27 650 6,446 1,862 350 78 1	233 73 349 0 617 54 1,301 12,892 3,725 700 157 3 3	\$164,821 \$51,542 \$246,807 \$0 \$436,691 \$38,373 \$920,959 \$9,127,175 \$2,637,136 \$9,127,175 \$2,637,136 \$111,013 \$119,556

2016 NSPS OOOOa - Updated Baseline

Table 1d. Three-Year Average Respondent Burden of Reporting and Recordkeeping RequirementsStandards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification,
or Reconstruction Commenced after September 18, 2015 (40 CFR part 60, subpart OOOOa)

Year	Total Respondents	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours	Labor Cost
1 (2019)	3,618	212,995	10,650	21,300	244,944	\$15,079,918
2 (2020)	3,876	238,256	11,913	23,826	273,994	\$16,868,382
3 (2021)	4,134	264,291	13,215	26,429	303,935	\$18,711,644
Total	11,628	715,542	35,777	71,554	822,873	\$50,659,944
Average	3,876	238,514	11,926	23,851	274,291	\$16,886,648

2016 NSPS OOOOa - Updated Baseline Table 2a. Year 1 Annual Burden and Cost to the Federal Government Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015 (40 CFR part 60, subpart OOOOa)

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-	No. of	EPA person-	Responses	Technical	Management	Clerical	Cost,\$ (b)
	hours per	occurrences	hours per	per	person-hours	person-hours	person-	
	occurrence	per plant	plant per	year (a)	per year	per year	hours per	
		per year	year		(E=CxD)	(Ex0.05)	year	
Activity			(C=AxB)				(Ex0.1)	
Report Review								
Notification of Construction/Reconstruction/Modification	0.5	1.0	0.5	8	4	0	0	\$214
Annual Report	4.0	1.0	4.0	2,672	10,688	534	1,069	\$570,739
Semiannual Report	4.0	2.0	8.0	28	224	11	22	\$11,962
TOTAL ANNUAL BURDEN					10,916	546	1,092	\$582,914
TOTAL ANNUAL BURDEN						12,553		\$502,914

^a We have assumed that the number of respondents that will be subject to subpart OOOOa in this year will be 2,700 owners and operators. This is based on 2,328 exploration and production businesses, 420 compressor stations, 28 processing plants, and 4 sweetening unit.

^b The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$64.16 (GS-13, Step 5, \$40.10 × 1.6), Technical rate of \$47.62 (GS-12, Step 1, \$29.76 × 1.6), and Clerical rate of \$25.76 (GS-6, Step 3, \$16.10 × 1.6). These rates are from the Office of Personnel Management (OPM), 2016 General Schedule, which excludes locality rates of pay.

2016 NSPS OOOOa - Updated Baseline Table 2b. Year 2 Annual Burden and Cost to the Federal Government Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015 (40 CFR part 60, subpart OOOOa)

uttib	eptember 10,		Pare 00) 000p					
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-	No. of	EPA person-	Responses	Technical	Management	Clerical	Cost,\$ (b)
	hours per	occurrences	hours per	per	person-hours	person-hours	person-	
	occurrence	per plant	plant per	year (a)	per year	per year	hours per	
		per year	year		(E=CxD)	(Ex0.05)	year	
Activity			(C=AxB)				(Ex0.1)	
Report Review								
Notification of Construction/Reconstruction/Modification	0.5	1.0	0.5	8	4	0	0	\$214
Annual Report	4.0	1.0	4.0	2,858	11,432	572	1,143	\$610,469
Semiannual Report	4.0	2.0	8.0	35	280	14	28	\$14,952
TOTAL ANNUAL BURDEN					11,716	586	1,172	\$625,634
TOTAL ANNUAL BURDEN						13,473		3023,034

^a We have assumed that the number of respondents that will be subject to subpart OOOOa in this year will be 2,893 owners and operators. This is based on 2,328 exploration and production businesses, 525 compressor stations, 35 processing plants, and 5 sweetening units.

^b The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$64.16 (GS-13, Step 5, \$40.10 × 1.6), Technical rate of \$47.62 (GS-12, Step 1, \$29.76 × 1.6), and Clerical rate of \$25.76 (GS-6, Step 3, \$16.10 × 1.6). These rates are from the Office of Personnel Management (OPM), 2016 General Schedule, which excludes locality rates of pay.

			Oa - Updated and Cost to t								
Standards of Performance for Crude C						r Reconstructi	on Commence	d			
after September 18, 2015 (40 CFR part 60, subpart OOOOa)											
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)			
	EPA person-	No. of	EPA person-	Responses	Technical	Management	Clerical	Cost,\$ (b)			
	hours per	occurrences	hours per	per	person-hours	person-hours	person-				
	occurrence	per plant	plant per	year (a)	per year	per year	hours per				
		per year	year		(E=CxD)	(Ex0.05)	year				
Activity			(C=AxB)				(Ex0.1)				
Report Review											
Notification of Construction/Reconstruction/Modification	0.5	1.0	0.5	8	4	0	0	\$214			
Annual Report	4.0	1.0	4.0	2,964	11,856	593	1,186	\$633,110			
Semiannual Report	4.0	2.0	8.0	42	336	17	34	\$17,942			
TOTAL ANNUAL DUDDEN			•	•	12,196	610	1,220	\$651 266			
TOTAL ANNUAL BURDEN						14,025		\$651,266			

^a We have assumed that the number of respondents that will be subject to subpart OOOOa in this year will be 3,006 owners and operators. This is based on 2,328 exploration and production businesses, 630 compressor stations, 42 processing plants, and 6 sweetening units.

^b The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$64.16 (GS-13, Step 5, \$40.10 × 1.6), Technical rate of \$47.62 (GS-12, Step 1, \$29.76 × 1.6), and Clerical rate of \$25.76 (GS-6, Step 3, \$16.10 × 1.6). These rates are from the Office of Personnel Management (OPM), 2016 General Schedule, which excludes locality rates of pay.

		ar Average Annual B	a - Updated Baseline urden and Cost to the F							
Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015 (40 CFR part 60, subpart OOOOa)										
Year	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours	Labor Cost					
1 (2019)	10,916	1,092	546	12,553	\$582,914					
2 (2020)	11,716	1,172	586	13,473	\$625,634					
3 (2021)	12,196	1,220	610	14,025	\$651,266					
Total	34,828	3,483	1,741	40,052	\$1,859,815					
Average 11,609 1,161 580 13,351 \$619,938										

Appendix B

Updated ICR Burden of NSPS OOOOa Assuming the 2018 NSPS OOOOa Reconsideration Proposal Amendments are Finalized (Does Not Consider the Impacts of the 2019 NSPS OOOOa EO 13783 Proposed Amendments)

Burden of NSPS OOOOa if only the 2018 NSPS OOOOa Reconsideration Proposal Amendments are Finalized Table 1a. Year 1 Respondent Burden of Reporting and Recordkeeping Requirements

Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced

after September 18, 2015 (40 CFR part 60, subpart OOOOa)

		(B) Number of Occurrences per Respondent per Year STEMS (Not Appi	(C) Person-Hours per Respondent per Year (A*B) licable)	(D) Respondents per Year	(E) Technical Person-Hours per Year (C*D)	(F) Managerial Person-Hours per Year (0.05*E)	(G) Clerical Person- Hours per Year (0.10*E)	(H) Cost per Year
pr 1. APPLICATIONS (Not Applicable) 2. SURVEY AND STUDIES (Not Applicable) 3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLD 4. REPORT REQUIREMENTS A. Read Instructions/Rule New Affected Facilities B. Required Activities Notification of Well Completion/Recompletion Notification of Construction/Reconstruction/Modification C. Create Information (Included in 5C)	OGY AND SYS	Occurrences per Respondent per Year STEMS (Not App	per Respondent per Year (A*B)		Person-Hours per Year	Person-Hours per Year	Hours per Year	Cost per Yea
pr 1. APPLICATIONS (Not Applicable) 2. SURVEY AND STUDIES (Not Applicable) 3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLD 4. REPORT REQUIREMENTS A. Read Instructions/Rule New Affected Facilities B. Required Activities Notification of Well Completion/Recompletion Notification of Construction/Reconstruction/Modification C. Create Information (Included in 5C)	OGY AND SYS	per Respondent per Year STEMS (Not App	per Year (A*B)		per Year	per Year		Cost per Yea
1. APPLICATIONS (Not Applicable) 2. SURVEY AND STUDIES (Not Applicable) 3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLG 4. REPORT REQUIREMENTS A. Read Instructions/Rule New Affected Facilities B. Required Activities Notification of Well Completion/Recompletion Notification of Construction/Reconstruction/Modification C. Create Information (Included in 5C)	OGY AND SYS	per Year	<u> </u>	per Year			(0.10*E)	
2. SURVEY AND STUDIES (Not Applicable) 3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLO 4. REPORT REQUIREMENTS A. Read Instructions/Rule New Affected Facilities B. Required Activities Notification of Well Completion/Recompletion Notification of Construction/Reconstruction/Modification C. Create Information (Included in 5C)	2	STEMS (Not App	licable)		(C+D)	(0.05*E)	I	
2. SURVEY AND STUDIES (Not Applicable) 3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLO 4. REPORT REQUIREMENTS A. Read Instructions/Rule New Affected Facilities B. Required Activities Notification of Well Completion/Recompletion Notification of Construction/Reconstruction/Modification C. Create Information (Included in 5C)	2		licable)					
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLO 4. REPORT REQUIREMENTS A. Read Instructions/Rule New Affected Facilities B. Required Activities Notification of Well Completion/Recompletion Notification of Construction/Reconstruction/Modification C. Create Information (Included in 5C)	2		licable)					
A. REPORT REQUIREMENTS A. Read Instructions/Rule New Affected Facilities B. Required Activities Notification of Well Completion/Recompletion Notification of Construction/Reconstruction/Modification C. Create Information (Included in 5C)	2		licable)					
A. Read Instructions/Rule New Affected Facilities B. Required Activities Notification of Well Completion/Recompletion Notification of Construction/Reconstruction/Modification C. Create Information (Included in 5C)		1	1				-	
New Affected Facilities B. Required Activities Notification of Well Completion/Recompletion Notification of Construction/Reconstruction/Modification C. Create Information (Included in 5C)		1					1	
B. Required Activities Notification of Well Completion/Recompletion Notification of Construction/Reconstruction/Modification C. Create Information (Included in 5C)		1	-					
Notification of Well Completion/Recompletion Notification of Construction/Reconstruction/Modification C. Create Information (Included in 5C)	0.25		2	3,618	7,236	362	724	\$512,304
Notification of Construction/Reconstruction/Modification C. Create Information (Included in 5C)	0.25					<u> </u>		
C. Create Information (Included in 5C)	0.20	10	2.5	2,328	5,820	291	582	\$412,053
	0.5	1	0.5	8	4	0	0	\$283
D. Gather Existing Information (Included in 5C)								
E. Annual Reports				·				
Well Completion/Recompletion	1	1	1	2,328	2,328	116	233	\$164,821
Centrifugal Compressor (Wet seal)	3	1	3	130	390	20	39	\$27,612
Reciprocating Compressor	1.5	1	2	2,490	3,735	187	374	\$264,436
Pneumatic Controllers	1	1	1	1,542	1,542	77	154	\$109,173
Pneumatic Pumps	2	1	2	2,168	4,336	217	434	\$306,986
Storage Vessel	2	1	2	2,433	4,866	243	487	\$344,510
Well Site (Fugitives)	4	1	4	2,328	9,312	466	931	\$659,284
Compressor Station (Fugitives)	4	1	4	1,250	5,000	250	500	\$353,997
Sweetening Units	4	1	4	5	20	230	2	\$1,416
0	4		4		20	1	2	\$1,410
F. Semiannual Reports	24	2	48	25	1.000	0.4	100	¢110.042
Gas Processing Plant	24	2	48	35	1,680	84	168	\$118,943
Reporting Requirement Subtotal					46,269	2,313	4,627	\$3,275,817
						53,209		
5. RECORDKEEPING REQUIREMENTS				_	· · · · · · · · · · · · · · · · · · ·		1	
A. Read Instructions (Included in 4A)								
B. Plan Activities (Included in 4B)						 		
C. Implement Activities					r			
Maintain completion log records	0.5	10	5	2,328	11,640	582	1,164	\$824,105
Maintain 300 GOR exemption records	1	1	1	2,328	2,328	116	233	\$164,821
Centrifugal Compressor (Wet seal)	4	1	4	130	520	26	52	\$36,816
Reciprocating Compressor (Rod Packing Change)	1	1	1	2,490	2,490	125	249	\$176,291
Reciprocating Compressor (Route to Process)	2	1	2	0	0	0	0	\$0
Pneumatic controllers	4	1	4	1,542	6,168	308	617	\$436,691
Pneumatic pumps (uncontrolled)	1	1	1	542	542	27	54	\$38,373
Pneumatic pumps (controlled)	1	1	1	1,626	1,626	81	163	\$115,120
Storage Vessels	2	1	2	43,321	86,642	4,332	8,664	\$6,134,202
Fugitive Emissions - Well Sites	1	8	8	2,328	18,624	931	1,862	\$1,318,568
Fugitive Emissions - Compressor Stations	1	2	2	1,250	2,500	125	250	\$176,999
Processing Plants	8	4	32	35	1,120	56	112	\$79,295
Sweetening Units	4	1	4	5	20	1	2	\$1,416
D. Record Data (Included in 5C)							1	
E. Time to Transmit or Disclose Information							1 1	
Records required by standards (Included in 4E)							1 1	
							1 1	
				,	,			
F. Train Personnel (Included in 5C)		L					1 1	
					134 220	6 711	13 /00	
F. Train Personnel (Included in 5C)					134,220	6,711	13,422	\$9,502,695
F. Train Personnel (Included in 5C) G. Time for Audits (Not Applicable)					134,220 180,489	6,711 154,353 9,024	13,422	\$9,502,695

Assumptions:

- 25 new centrifugal compressors equipped with wet seals will become affected each year (2018 GHGI).
 - 498 reciprocating compressors will become affected each year. All will comply by changing the rod packing rather than routing to a process (2018 GHGI).

• 1,542 new pneumatic controllers will become affected facilities each year (2018 GHGI).

• 4,336 new pneumatic pumps per year (2018 GHGI). 50% are diaphragm pumps and affected facilities year and 75% will be controlled (2018 TSD, page 92-93).

• 9,597 new storage vessels per year (estimated based on average increase in new storage vessels 2019-2021).

• 7 new processing plants will become affected each year.

B-2

Burden of NSPS OOOOa if only the 2018 NSPS OOOOa Reconsideration Proposal Amendments are Finalized Table 1b. Year 2 Respondent Burden of Reporting and Recordkeeping Requirements

Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015 (40 CFR part 60, subpart OOOOa)

after	September 1	8, 2015 (40 C	FR part 60, su	bpart 0000a	1)

	i ocpicinoci i	0, 2013 (40 01	i K part 00, su	Jpan 00000	1)	r		
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
		Number of	Person-Hours		Technical	Managerial	Clerical Person-	
Year	Person-Hours	Occurrences	per Respondent	Respondents	Person-Hours	Person-Hours	Hours per Year	Cost per Year
	per Occurrence	per Respondent	per Year (A*B)	per Year	per Year	per Year	(0.10*E)	
		per Year			(C*D)	(0.05*E)		
1. APPLICATIONS (Not Applicable)					_			
2. SURVEY AND STUDIES (Not Applicable)	LOCK AND CV		1					
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNO	DLUGY AND SYS	STEMS (Not Appl	icable)					
4. REPORT REQUIREMENTS		1	1				T	1
A. Read Instructions/Rule	-	-						
New Affected Facilities	2	1	2	3,876	7,752	388	775	\$548,837
B. Required Activities								
Notification of Well Completion/Recompletion	0.25	10	2.5	2,328	5,820	291	582	\$412,053
Notification of Construction/Reconstruction/Modification	0.5	1	0.5	8	4	0	0	\$283
C. Create Information (Included in 5C)								
D. Gather Existing Information (Included in 5C)								
E. Annual Reports								
Well Completion/Recompletion	1	1	1	2,328	2,328	116	233	\$164,821
Centrifugal Compressor (Wet seal)	3	1	3	156	468	23	47	\$33,134
Reciprocating Compressor	1.5	1	2	2,988	4,482	224	448	\$317,323
Pneumatic Controllers	1	1	1	1,542	1,542	77	154	\$109,173
Pneumatic Pumps	2	1	2	2,168	4,336	217	434	\$306,986
Storage Vessel	2	1	2	2,433	4,866	243	487	\$344,510
Well Site (Fugitives)	4	1	4	2,328	9,312	466	931	\$659,284
Compressor Station (Fugitives)	4	1	4	1,500	6,000	300	600	\$424,796
Sweetening Units	4	1	4	6	24	1	2	\$1,699
F. Semiannual Reports				Ű				\$1,000
Gas Processing Plant	24	2	48	42	2,016	101	202	\$142,732
Gus i roccisnig i lunc	24	1	40	72	48,950	2,448	4,895	<i>\$142,752</i>
Reporting Requirement Subtotal					10,000	56,293	1,000	\$3,465,631
5. RECORDKEEPING REQUIREMENTS						00,200		
A. Read Instructions (Included in 4A)							1	
B. Plan Activities (Included in 4B)							-	
C. Implement Activities								
Maintain completion log records		10	5		11,640	500	-	
Maintain Completion rog records	0 E						1 1 6 4	¢074 10E
Maintain 500 GOK exemption records	0.5	10		2,328		582	1,164	\$824,105
Contributed Compressor (Mot coal)	1	1	1	2,328	2,328	116	233	\$164,821
Centrifugal Compressor (Wet seal)	1 4	1 1	1 4	2,328 156	2,328 624	116 31	233 62	\$164,821 \$44,179
Reciprocating Compressor (Rod Packing Change)	1 4 1	1 1 1	1 4 1	2,328 156 2,988	2,328 624 2,988	116 31 149	233 62 299	\$164,821 \$44,179 \$211,549
Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process)	1 4 1 2	1 1 1 1	1 4 1 2	2,328 156 2,988 0	2,328 624 2,988 0	116 31 149 0	233 62 299 0	\$164,821 \$44,179 \$211,549 \$0
Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers	1 4 1 2 4	1 1 1 1 1	1 4 1 2 4	2,328 156 2,988 0 1,542	2,328 624 2,988 0 6,168	116 31 149 0 308	233 62 299 0 617	\$164,821 \$44,179 \$211,549 \$0 \$436,691
Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled)	1 4 1 2 4 1	1 1 1 1 1 1 1	1 4 1 2 4 1	2,328 156 2,988 0 1,542 542	2,328 624 2,988 0 6,168 542	116 31 149 0 308 27	233 62 299 0 617 54	\$164,821 \$44,179 \$211,549 \$0 \$436,691 \$38,373
Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled)	1 4 2 4 1 1 1	1 1 1 1 1 1 1 1	1 4 1 2 4 1 1	2,328 156 2,988 0 1,542 542 1,626	2,328 624 2,988 0 6,168 542 1,626	116 31 149 0 308 27 81	233 62 299 0 617 54 163	\$164,821 \$44,179 \$211,549 \$0 \$436,691 \$38,373 \$115,120
Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels	1 4 1 2 4 1 1 2	1 1 1 1 1 1 1 1 1	1 4 1 2 4 1 1 2	2,328 156 2,988 0 1,542 542 1,626 53,696	2,328 624 2,988 0 6,168 542 1,626 107,392	116 31 149 0 308 27 81 5,370	233 62 299 0 617 54 163 10,739	\$164,821 \$44,179 \$211,549 \$0 \$436,691 \$38,373 \$115,120 \$7,603,289
Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites	1 4 1 2 4 1 1 2 1	1 1 1 1 1 1 1 1 8	1 4 1 2 4 1 1 2 8	2,328 156 2,988 0 1,542 542 1,626 53,696 2,328	2,328 624 2,988 0 6,168 542 1,626 107,392 18,624	116 31 149 0 308 27 81 5,370 931	233 62 299 0 617 54 163 10,739 1,862	\$164,821 \$44,179 \$211,549 \$0 \$436,691 \$38,373 \$115,120 \$7,603,289 \$1,318,568
Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations	1 4 1 2 4 1 1 2 1 1 1 1	1 1 1 1 1 1 1 1 8 2	1 4 1 2 4 1 1 2 8 8 2	2,328 156 2,988 0 1,542 542 1,626 53,696 2,328 1,500	2,328 624 2,988 0 6,168 542 1,626 107,392 18,624 3,000	116 31 149 0 308 27 81 5,370 931 150	233 62 299 0 617 54 163 10,739 1,862 300	\$164,821 \$44,179 \$211,549 \$0 \$436,691 \$38,373 \$115,120 \$7,603,289 \$1,318,568 \$212,398
Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants	1 4 1 2 4 1 1 2 1 1 8	1 1 1 1 1 1 1 1 8 2 4	1 4 1 2 4 1 1 2 8 8 2 32	2,328 156 2,988 0 1,542 542 1,626 53,696 2,328 1,500 42	2,328 624 2,988 0 6,168 542 1,626 107,392 18,624 3,000 1,344	116 31 149 0 308 27 81 5,370 931 150 67	233 62 299 0 617 54 163 10,739 1,862 300 134	\$164,821 \$44,179 \$211,549 \$0 \$436,691 \$38,373 \$115,120 \$7,603,289 \$1,318,568 \$212,398 \$95,154
Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units	1 4 1 2 4 1 1 2 1 1 1 1	1 1 1 1 1 1 1 1 8 2	1 4 1 2 4 1 1 2 8 8 2	2,328 156 2,988 0 1,542 542 1,626 53,696 2,328 1,500	2,328 624 2,988 0 6,168 542 1,626 107,392 18,624 3,000	116 31 149 0 308 27 81 5,370 931 150	233 62 299 0 617 54 163 10,739 1,862 300	\$164,821 \$44,179 \$211,549 \$0 \$436,691 \$38,373 \$115,120 \$7,603,289 \$1,318,568 \$212,398
Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Processing Plants Sweetening Units D. Record Data (Included in 5C)	1 4 1 2 4 1 1 2 1 1 8	1 1 1 1 1 1 1 1 8 2 4	1 4 1 2 4 1 1 2 8 8 2 32	2,328 156 2,988 0 1,542 542 1,626 53,696 2,328 1,500 42	2,328 624 2,988 0 6,168 542 1,626 107,392 18,624 3,000 1,344	116 31 149 0 308 27 81 5,370 931 150 67	233 62 299 0 617 54 163 10,739 1,862 300 134	\$164,821 \$44,179 \$211,549 \$0 \$436,691 \$38,373 \$115,120 \$7,603,289 \$1,318,568 \$212,398 \$95,154
Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pineumatic pumps (controlled) Storage Vessels Fugitive Emissions - Ompressor Stations Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information	1 4 1 2 4 1 1 2 1 1 8	1 1 1 1 1 1 1 1 8 2 4	1 4 1 2 4 1 1 2 8 8 2 32	2,328 156 2,988 0 1,542 542 1,626 53,696 2,328 1,500 42	2,328 624 2,988 0 6,168 542 1,626 107,392 18,624 3,000 1,344	116 31 149 0 308 27 81 5,370 931 150 67	233 62 299 0 617 54 163 10,739 1,862 300 134	\$164,821 \$44,179 \$211,549 \$0 \$436,691 \$38,373 \$115,120 \$7,603,289 \$1,318,568 \$212,398 \$95,154
Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (nocontrolled) Storage Vessels Fugitive Emissions - Well Sites Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E)	1 4 1 2 4 1 1 2 1 1 8	1 1 1 1 1 1 1 1 8 2 4	1 4 1 2 4 1 1 2 8 8 2 32	2,328 156 2,988 0 1,542 542 1,626 53,696 2,328 1,500 42	2,328 624 2,988 0 6,168 542 1,626 107,392 18,624 3,000 1,344	116 31 149 0 308 27 81 5,370 931 150 67	233 62 299 0 617 54 163 10,739 1,862 300 134	\$164,821 \$44,179 \$211,549 \$0 \$436,691 \$38,373 \$115,120 \$7,603,289 \$1,318,568 \$212,398 \$95,154
Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Storage Vessels Fugitive Emissions - Well Sites Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E) F. Train Personnel (Included in 5C)	1 4 1 2 4 1 1 2 1 1 8	1 1 1 1 1 1 1 1 8 2 4	1 4 1 2 4 1 1 2 8 8 2 32	2,328 156 2,988 0 1,542 542 1,626 53,696 2,328 1,500 42	2,328 624 2,988 0 6,168 542 1,626 107,392 18,624 3,000 1,344	116 31 149 0 308 27 81 5,370 931 150 67	233 62 299 0 617 54 163 10,739 1,862 300 134	\$164,821 \$44,179 \$211,549 \$0 \$436,691 \$38,373 \$115,120 \$7,603,289 \$1,318,568 \$212,398 \$95,154
Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (nocontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E)	1 4 1 2 4 1 1 2 1 1 8	1 1 1 1 1 1 1 1 8 2 4	1 4 1 2 4 1 1 2 8 8 2 32	2,328 156 2,988 0 1,542 542 1,626 53,696 2,328 1,500 42	2,328 624 2,988 0 6,168 542 1,626 107,392 18,624 3,000 1,344 24	116 31 149 0 308 27 81 5,370 931 150 67 1	233 62 299 0 617 54 163 10,739 1,862 300 134 2	\$164,821 \$44,179 \$211,549 \$0 \$436,691 \$38,373 \$115,120 \$7,603,289 \$1,318,568 \$212,398 \$95,154
Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Storage Vessels Fugitive Emissions - Well Sites Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E) F. Train Personnel (Included in 5C)	1 4 1 2 4 1 1 2 1 1 8	1 1 1 1 1 1 1 1 8 2 4	1 4 1 2 4 1 1 2 8 8 2 32	2,328 156 2,988 0 1,542 542 1,626 53,696 2,328 1,500 42	2,328 624 2,988 0 6,168 542 1,626 107,392 18,624 3,000 1,344	116 31 149 0 308 27 81 5,370 931 150 67 1 1 	233 62 299 0 617 54 163 10,739 1,862 300 134	\$164,821 \$44,179 \$211,549 \$0 \$436,691 \$38,373 \$115,120 \$7,603,289 \$1,318,568 \$212,398 \$95,154
Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (nocontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E) F. Train Personnel (Included in 5C) G. Time for Audits (Not Applicable)	1 4 1 2 4 1 1 2 1 1 8	1 1 1 1 1 1 1 1 8 2 4	1 4 1 2 4 1 1 2 8 8 2 32	2,328 156 2,988 0 1,542 542 1,626 53,696 2,328 1,500 42	2,328 624 2,988 0 6,168 542 1,626 107,392 18,624 3,000 1,344 24	116 31 149 0 308 27 81 5,370 931 150 67 1	233 62 299 0 617 54 163 10,739 1,862 300 134 2	\$164,821 \$44,179 \$211,549 \$0 \$436,691 \$38,373 \$115,120 \$7,603,289 \$1,318,568 \$212,398 \$95,154 \$1,699

Assumptions: • 26 new centrifugal compressors equipped with wet seals will become affected each year (2018 GHGI).

• 498 reciprocating compressors will become affected each year. All will comply by changing the rod packing rather than routing to a process (2018 GHGI).

• 1,542 new pneumatic controllers will become affected facilities each year (2018 GHGI).

• 4,336 new pneumatic pumps per year (2018 GHGI). 50% are diaphragm pumps and affected facilities year and 75% will be controlled (2018 TSD, page 92-93).

• 9,597 new storage vessels per year (estimated based on average increase in new storage vessels 2019-2021).

7 new processing plants will become affected each year.
1 new suprotoping facility will become affected each year

Burden of NSPS OOOOa if only the 2018 NSPS OOOOa Reconsideration Proposal Amendments are Finalized Table 1c. Year 3 Respondent Burden of Reporting and Recordkeeping Requirements

Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced

afte	r September	<u>18, 2015 (40 C</u>	FR part 60, su	bpart 0000	<u>)a)</u>			
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
		Number of	Person-Hours		Technical	Managerial	Clerical Person-	
Year	Person-Hours	Occurrences	per Respondent	Respondents	Person-Hours	Person-Hours	Hours per Year	Cost per Yea
	per Occurrence	per Respondent per Year	per Year (A*B)	per Year	per Year (C*D)	per Year (0.05*E)	(0.10*E)	-
1. APPLICATIONS (Not Applicable)		per rear			(C·D)	(0.03°E)		
2. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHN	OLOGY AND S	YSTEMS (Not A	plicable)					
4. REPORT REQUIREMENTS								
A. Read Instructions/Rule								
New Affected Facilities	2	1	2	4,134	8,268	413	827	\$585,369
B. Required Activities								
Notification of Well Completion/Recompletion	0.25	10	2.5	2,328	5,820	291	582	\$412,053
Notification of Construction/Reconstruction/Modification	0.5	1	0.5	8	4	0	0	\$283
C. Create Information (Included in 5C)								
D. Gather Existing Information (Included in 5C)								
E. Annual Reports								
Well Completion/Recompletion	1	1	1	2,328	2,328	116	233	\$164,821
Centrifugal Compressor (Wet seal)	3	1	3	182	546	27	55	\$38,656
Reciprocating Compressor	1.5	1	2	3,486	5,229	261	523	\$370,210
Pneumatic Controllers	1	1	1	1,542	1,542	77	154	\$109,173
Pneumatic Pumps	2	1	2	2,168	4,336	217	434	\$306,986
Storage Vessel	2	1	2	2,433	4,866	243	487	\$344,510
Well Site (Fugitives)	4	1	4	2,328	9,312	466	931	\$659,284
Compressor Station (Fugitives)	4	1	4	1,750	7,000	350	700	\$495,596
Sweetening Units	4	1	4	7	28	1	3	\$1,982
F. Semiannual Reports								
Gas Processing Plant	24	2	48	49	2,352	118	235	\$166,520
Reporting Requirement Subtotal					51,631	2,582 59,376	5,163	\$3,655,444
5. RECORDKEEPING REQUIREMENTS						00,010		
A. Read Instructions (Included in 4A)								
B. Plan Activities (Included in 4B)								
C. Implement Activities								
Maintain completion log records	0.5	10	5	2,328	11,640	582	1,164	\$824,105
Maintain 300 GOR exemption records	1	1	1	2,328	2,328	116	233	\$164,821
Centrifugal Compressor (Wet seal)	4	1	4	182	728	36	73	\$51,542
Reciprocating Compressor (Rod Packing Change)	1	1	1	3,486	3,486	174	349	\$246,807
Reciprocating Compressor (Route to Process)	2	1	2	0	0	0	0	\$0
Pneumatic controllers	4	1	4	1,542	6,168	308	617	\$436,691
Pneumatic pumps (uncontrolled)	1	1	1	542	542	27	54	\$38,373
Pneumatic pumps (controlled)	1	1	1	1,626	1,626	81	163	\$115,120
Storage Vessels	2	1	2	64,458	128,916	6,446	12,892	\$9,127,175
Fugitive Emissions - Well Sites	1	8	8	2,328	18,624	931	1,862	\$1,318,568
Fugitive Emissions - Compressor Stations	1	2	2	1,750	3,500	175	350	\$247,798
Processing Plants	8	4	32	49	1,568	78	157	\$111,013
Sweetening Units	4	1	4	7	28	1	3	\$1,982
D. Record Data (Included in 5C)		·						
E. Time to Transmit or Disclose Information								
Records required by standards (Included in 4E)								
F. Train Personnel (Included in 5C)								
G. Time for Audits (Not Applicable)								
Recordkeeping Requirement Subtotal					179,154	8,958 206,027	17,915	\$12,683,99
					230,785	11,539	23,079	
IOTAL REPORTING AND RECORDKEEPING LABOR AND COST					200,700	265,403	20,075	\$16,339,44

Assumptions:

• 26 new centrifugal compressors equipped with wet seals will become affected each year (2018 GHGI).

• 498 reciprocating compressors will become affected each year. All will comply by changing the rod packing rather than routing to a process (2018 GHGI).

• 1,542 new pneumatic controllers will become affected facilities each year (2018 GHGI).

• 4,336 new pneumatic pumps per year (2018 GHGI). 50% are diaphragm pumps and affected facilities year and 75% will be controlled (2018 TSD, page 92-93).

• 9,597 new storage vessels per year (estimated based on average increase in new storage vessels 2019-2021).

• 7 new processing plants will become affected each year.

Burden of NSPS OOOOa if only the 2018 NSPS OOOOa Reconsideration Proposal Amendments are Finalized Table 1d. Three-Year Average Respondent Burden of Reporting and Recordkeeping Requirements Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015 (40 CFR part 60, subpart OOOOa)

	Total					
Year	Respondents	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours	Labor Cost
1	3,618	180,489	9,024	18,049	207,562	\$12,778,513
2	3,876	205,250	10,263	20,525	236,038	\$14,531,577
3	4,134	230,785	11,539	23,079	265,403	\$16,339,440
Total	11,628	616,524	30,826	61,652	709,003	\$43,649,529
Average	3,876	205,508	10,275	20,551	236,334	\$14,549,843

Number of respondents in Year 1 is based on 2,328 exploration and production businesses, 1,250 compressor stations, 35 processing plants, and 5 sweetening units. Number of respondents in Year 2 is based on 2,328 exploration and production businesses, 1,500 compressor stations, 42 processing plants, and 6 sweetening units. Number of respondents in Year 3 is based on 2,328 exploration and production businesses, 1,750 compressor stations, 49 processing plants, and 7 sweetening units.

Burden of NSPS OOOOa if only the 2018 NSPS OOOOa Reconsideration Proposal Amendments are Finalized Table 2a. Year 1 Annual Burden and Cost to the Federal Government Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced

a	fter Septemb	er 18, 2015 (4	0 CFR part 60	, subpart OO	OOa)

IOTAL ANNUAL BURDEN						16,808		\$760,494
TOTAL ANNUAL BURDEN					14,616	731	1,462	\$780,494
Semiannual Report	4	2	8	35	280	14	28	\$14,952
Annual Report	4	1	4	3,583	14,332	717	1,433	\$765,329
Notification of Construction/Reconstruction/Modification	0.5	1	0.5	8	4	0	0	\$214
Report Review								
Activity			(C=AxB)				(Ex0.1)	
		per year	year		(E=CxD)	(Ex0.05)	year	
	occurrence	per plant	plant per	year	per year	per year	hours per	
	hours per	occurrences	hours per	per	person-hours	person-hours	person-	
	EPA person-	No. of	EPA person-	Responses	Technical	Management	Clerical	Cost (\$) ^a
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)

^a The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rate of \$64.16 (GS-13, Step 5, \$40.10 × 1.6), Technical rate of \$47.62 (GS-12, Step 1, \$29.76 × 1.6), and Clerical rate of \$25.76 (GS-6, Step 3, \$16.10 × 1.6). These rates are from the Office of Personnel Management (OPM), 2016 General Schedule, which excludes locality rates of pay.

Burden of NSPS OOOOa if only the 2018 NSPS OOOOa Reconsideration Proposal Amendments are Finalized Table 2b. Year 2 Annual Burden and Cost to the Federal Government Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced

tandards of Performance for Crude OII and Natural Gas Facilities for which Construction, Modulication, or Reconstruction Commenced

a	after September 18, 2015 (40 CFR part 60, subpart OOOOa)										
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)			
	EPA person-	No. of	EPA person-	Responses	Technical	Management	Clerical	Cost (\$) ^a			
	hours per	occurrences	hours per	per	person-hours	person-hours	person-				
	occurrence	per plant	plant per	year	per year	per year	hours per				
		per year	year		(E=CxD)	(Ex0.05)	year				
Activity			(C=AxB)				(Ex0.1)				
Report Review											
Notification of Construction/Reconstruction/Modification	0.5	1	0.5	8	4	0	0	\$214			
Annual Report	4	1	4	3,834	15,336	767	1,534	\$818,942			
Semiannual Report	4	2	8	42	336	17	34	\$17,942			
TOTAL ANNUAL BURDEN					15,676	784	1,568	\$927.009			
TO TAL ANNUAL BURDEN						18,027		\$837,098			

^a The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rate of \$64.16 (GS-13, Step 5, \$40.10 × 1.6), Technical rate of \$47.62 (GS-12, Step 1, \$29.76 × 1.6), and Clerical rate of \$25.76 (GS-6, Step 3, \$16.10 × 1.6). These rates are from the Office of Personnel Management (OPM), 2016 General Schedule, which excludes locality rates of pay.

Burden of NSPS OOOOa if only the 2018 NSPS OOOOa Reconsideration Proposal Amendments are Finalized Table 2c. Year 3 Annual Burden and Cost to the Federal Government Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after Sentember 18, 2015 (40 CFP part 60, subpart OOOOa)

d	itter Septemb	er 18, 2015 (4	u CFR part 60	, subpart OO	UUa)			
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-	No. of	EPA person-	Responses	Technical	Management	Clerical	Cost (\$) ^a
	hours per	occurrences	hours per	per	person-hours	person-hours	person-	
	occurrence	per plant	plant per	year	per year	per year	hours per	
		per year	year		(E=CxD)	(Ex0.05)	year	
Activity			(C=AxB)				(Ex0.1)	
Report Review								
Notification of Construction/Reconstruction/Modification	0.5	1	0.5	8	4	0	0	\$214
Annual Report	4	1	4	4,085	16,340	817	1,634	\$872,556
Semiannual Report	4	2	8	49	392	20	39	\$20,933
TOTAL ANNUAL BURDEN					16,736	837	1,674	\$893,702
IOTAL AININUAL BURDEN						19,246		\$695,702

^a The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rate of \$64.16 (GS-13, Step 5, \$40.10 × 1.6), Technical rate of \$47.62 (GS-12, Step 1, \$29.76 × 1.6), and Clerical rate of \$25.76 (GS-6, Step 3, \$16.10 × 1.6). These rates are from the Office of Personnel Management (OPM), 2016 General Schedule, which excludes locality rates of pay.

Burden of NSPS OOOOa if only the 2018 NSPS OOOOa Reconsideration Proposal Amendments are Finalized Table 2d. Three-Year Average Annual Burden and Cost to the Federal Government Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015 (40 CFR part 60, subpart OOOOa)

Year	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours	Labor Cost
1	14,616	1,462	731	16,808	780,494
2	15,676	1,568	784	18,027	837,098
3	16,736	1,674	837	19,246	893,702
Total	47,028	4,703	2,351	54,082	\$2,511,295
Average	15,676	1,568	784	18,027	\$837,098

Appendix C

Updated ICR Burden of NSPS OOOOa Assuming the 2019 NSPS OOOOa EO 13783 Review Proposal Amendments are Finalized Only (Does Not Consider the Impacts of the 2018 NSPS OOOOa Reconsideration Proposed Amendments)

2019 NSPS OOOOa EO 13783 Review Proposal Only Table 1a. Year 1 Respondent Burden of Reporting and Recordkeeping Requirements Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015 (40 CFR part 60, subpart OOOOa)

Year	(A)	(B)	(C)					
Year		(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person-Hours per Occurrence	Number of Occurrences per Respondent per Year	Person-Hours per Respondent per Year (A*B)	Respondents per Year	Technical Person- Hours per Year (C*D)	Managerial Person- Hours per Year (0.05*E)	Clerical Person- Hours per Year (0.10*E)	Cost per Year
		respondent per rea	1cm (11 D)		(0.2)	(0.00 1)	(0.10 1)	
1. APPLICATIONS (Not Applicable)								
2. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOL 4. REPORT REQUIREMENTS	OGY AND SYSTEM	S (Not Applicable)						
A. Read Instructions	1							
New Affected Facilities	2	1	2	3,428	6,856	343	686	\$485,401
B. Required Activities	2	1	2	3,420	0,850	343	000	\$403,401
Notification of Well Completion/Recompletion	0.25	10	2.5	2,328	5,820	291	582	\$412,053
Notification of Construction/Reconstruction/Modification	0.5	10	0.5	8	4	0	0	\$283
C. Create Information (Included in 5C)								
D. Gather Existing Information (Included in 5C)								
E. Annual Reports								
Well Completion/Recompletion	1	1	1	2,328	2,328	116	233	\$164,821
Centrifugal Compressor (Wet seal)	3	1	3	40	120	6	12	\$8,496
Reciprocating Compressor	1.5	1	2	2,110	3,165	158	317	\$224,080
Pneumatic Controllers	1	1	1	1,234	1,234	62	123	\$87,366
Pneumatic Pumps	2	1	2	2,168	4,336	217	434	\$306,986
Storage Vessel	2	1	2	2,433	4,866	243	487	\$344,510
Well Site (Fugitives)	4	1	4	2,328	9,312	466	931	\$659,284
Compressor Station (Fugitives)	4	1	4	1,060	4,240	212	424	\$300,189
Sweetening Unit	4	1	4	5	20	1	2	\$1,416
F. Semiannual Reports								
Gas Processing Plant	24	2	48	35	1,680	84	168	\$118,943
Reporting Requirement Subtotal					43,981	2,199 50,578	4,398	\$3,113,828
5. RECORDKEEPING REQUIREMENTS								
5. RECORDKEEPING REQUIREMENTS								
5. RECORDKEEPING REQUIREMENTS A. Read Instructions (Included in 4A)								
5. RECORDREEPING REQUIREMENTS A. Read Instructions (Included in 4A) B. Plan Activities (Included in 4B)	0.5	10	5	2,328	11,640	582	1,164	\$824,105
5. RECORDREEPING REQUIREMENTS A. Read Instructions (Included in 4A) B. Plan Activities (Included in 4B) C. Implement Activities	0.5	10 1	5	2,328 2,328	11,640 2,328		1,164 233	\$824,105 \$164,821
5. RECORDEEEPING REQUIREMENTS A. Read Instructions (Included in 4A) B. Plan Activities (Included in 4B) C. Implement Activities Mainain completion log records						582		
5. RECORDKEEPING REQUIREMENTS A. Read Instructions (Included in 4A) B. Plan Activities (Included in 4B) C. Implement Activities Maintain completion log records Maintain 300 GOR exemption records	1	1	1	2,328	2,328	582 116	233	\$164,821
5. RECORDKEEPING REQUIREMENTS A. Read Instructions (Included in 4A) B. Plan Activities (Included in 4B) C. Implement Activities Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal)	1 4	1 1	1 4	2,328 40	2,328 160	582 116 8	233 16	\$164,821 \$11,328
5. RECORDKEEPING REQUIREMENTS A. Read Instructions (Included in 4A) B. Plan Activities (Included in 4B) C. Implement Activities Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Wet seal)	1 4 1	1 1 1	1 4 1	2,328 40 2,110	2,328 160 2,110	582 116 8 106	233 16 211	\$164,821 \$11,328 \$149,387
5. RECORDREEPING REQUIREMENTS A. Read Instructions (Included in 4A) B. Plan Activities (Included in 4B) C. Implement Activities Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Route to Process) Reciprocating Compressor (Route to Process)	1 4 1 2	1 1 1 1	1 4 1 2	2,328 40 2,110 0	2,328 160 2,110 0	582 116 8 106 0	233 16 211 0	\$164,821 \$11,328 \$149,387 \$0
5. RECORDEEEPING REQUIREMENTS A. Read Instructions (Included in 4A) B. Plan Activities (Included in 4B) C. Implement Activities Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Nota to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled)	1 4 1 2 4 1 8	1 1 1 1 1 1 1 1	1 4 1 2 4 1 8	2,328 40 2,110 0 1,234 542 1,626	2,328 160 2,110 0 4,936 542 13,008	582 116 8 106 0 247 27 650	233 16 211 0 494 54 1,301	\$164,821 \$11,328 \$149,387 \$0 \$349,466 \$38,373 \$920,959
5. RECORDREEPING REQUIREMENTS A. Read Instructions (Included in 4A) B. Plan Activities (Included in 4B) C. Implement Activities Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels	1 4 1 2 4 1	1 1 1 1 1 1 1	1 4 1 2 4 1	2,328 40 2,110 0 1,234 542	2,328 160 2,110 0 4,936 542	582 116 8 106 0 247 27	233 16 211 0 494 54	\$164,821 \$11,328 \$149,387 \$0 \$349,466 \$38,373
5. RECORDKEEPING REQUIREMENTS A. Read Instructions (Included in 4A) B. Plan Activities (Included in 4B) C. Implement Activities Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Rod the Process) Pneumatic Controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites	1 4 1 2 4 1 8	1 1 1 1 1 1 1 1 1 1 1 6	1 4 1 2 4 1 8 2 16	2,328 40 2,110 0 1,234 542 1,626 43,321 2,328	2,328 160 2,110 0 4,936 542 13,008 86,642 37,248	582 116 8 106 0 247 27 650 4,332 1,862	233 16 211 0 494 54 1,301 8,664 3,725	\$164,821 \$11,328 \$149,387 \$0 \$349,466 \$38,373 \$920,959 \$6,134,202 \$2,637,136
5. RECORDICEEPING REQUIREMENTS A. Read Instructions (Included in 4A) B. Plan Activities (Included in 4B) C. Implement Activities Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Wet seal) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Rod Packing Change) Pneumatic controllers Pneumatic pumps (controlled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations	1 4 1 2 4 1 8 2 1 1 1	1 1 1 1 1 1 1 1 1 6 4	1 4 1 2 4 1 1 8 2 16 4	2,328 40 2,110 0 1,234 542 1,626 43,321 2,328 1,060	2,328 160 2,110 0 4,936 542 13,008 86,642 37,248 4,240	582 116 8 106 0 247 27 650 4,332 1,862 212	233 16 211 0 494 54 1,301 8,664 3,725 424	\$164,821 \$11,328 \$149,387 \$0 \$349,466 \$38,373 \$920,959 \$6,134,202 \$2,637,136 \$300,189
5. RECORDREEPING REQUIREMENTS A. Read Instructions (Included in 4A) B. Plan Activities (Included in 4B) C. Implement Activities Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Rout et seal) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants	1 4 2 4 1 8 2 1 1 8 8	1 1 1 1 1 1 1 1 1 6 4 4	1 4 1 2 4 1 8 2 16 4 32	2,328 40 2,110 1,234 542 1,626 43,321 2,328 1,060 35	2,328 160 2,110 0 4,936 542 13,008 86,642 37,248 4,240 1,120	582 116 8 106 0 247 27 650 4,332 1,862 212 56	233 16 211 0 494 54 1,301 8,664 3,725 424 112	\$164,821 \$11,328 \$149,387 \$0 \$349,466 \$38,373 \$920,959 \$6,134,202 \$2,637,136 \$300,189 \$79,295
5. RECORDKEEPING REQUIREMENTS A. Read Instructions (Included in 4A) B. Plan Activities (Included in 4B) C. Implement Activities Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Route seal) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Swetering Units	1 4 1 2 4 1 8 2 1 1 1	1 1 1 1 1 1 1 1 1 6 4	1 4 1 2 4 1 1 8 2 16 4	2,328 40 2,110 0 1,234 542 1,626 43,321 2,328 1,060	2,328 160 2,110 0 4,936 542 13,008 86,642 37,248 4,240	582 116 8 106 0 247 27 650 4,332 1,862 212	233 16 211 0 494 54 1,301 8,664 3,725 424	\$164,821 \$11,328 \$149,387 \$0 \$349,466 \$38,373 \$920,959 \$6,134,202 \$2,637,136 \$300,189
5. RECORDREEPING REQUIREMENTS A. Read Instructions (Included in 4A) B. Plan Activities (Included in 4B) C. Implement Activities Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Nod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic pumps (uncontrolled) Pneumatic pumps (uncontrolled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plans Sweetening Units D. Record Data (Included in 5C)	1 4 2 4 1 8 2 1 1 8 8	1 1 1 1 1 1 1 1 1 6 4 4	1 4 1 2 4 1 8 2 16 4 32	2,328 40 2,110 1,234 542 1,626 43,321 2,328 1,060 35	2,328 160 2,110 0 4,936 542 13,008 86,642 37,248 4,240 1,120	582 116 8 106 0 247 27 650 4,332 1,862 212 56	233 16 211 0 494 54 1,301 8,664 3,725 424 112	\$164,821 \$11,328 \$149,387 \$0 \$349,466 \$38,373 \$920,959 \$6,134,202 \$2,637,136 \$300,189 \$79,295
5. RECORDREEPING REQUIREMENTS A. Read Instructions (Included in 4A) B. Plan Activities (Included in 4B) C. Implement Activities Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Wet seal) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information	1 4 2 4 1 8 2 1 1 8 8	1 1 1 1 1 1 1 1 1 6 4 4	1 4 1 2 4 1 8 2 16 4 32	2,328 40 2,110 1,234 542 1,626 43,321 2,328 1,060 35	2,328 160 2,110 0 4,936 542 13,008 86,642 37,248 4,240 1,120	582 116 8 106 0 247 27 650 4,332 1,862 212 56	233 16 211 0 494 54 1,301 8,664 3,725 424 112	\$164,821 \$11,328 \$149,387 \$0 \$349,466 \$38,373 \$920,959 \$6,134,202 \$2,637,136 \$300,189 \$79,295
5. RECORDREEPING REQUIREMENTS A. Read Instructions (Included in 4A) B. Plan Activities (Included in 4B) C. Implement Activities Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Roate scalar) Reciprocating Compressor (Roate to Process) Pneumatic controllers Pneumatic controllers Pneumatic pumps (uncontrolled) Storage Vessels Fugitive Emissions - Vell Sites Fugitive Emissions - Vell Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E)	1 4 2 4 1 8 2 1 1 8 8	1 1 1 1 1 1 1 1 1 6 4 4	1 4 1 2 4 1 8 2 16 4 32	2,328 40 2,110 1,234 542 1,626 43,321 2,328 1,060 35	2,328 160 2,110 0 4,936 542 13,008 86,642 37,248 4,240 1,120	582 116 8 106 0 247 27 650 4,332 1,862 212 56	233 16 211 0 494 54 1,301 8,664 3,725 424 112	\$164,821 \$11,328 \$149,387 \$0 \$349,466 \$38,373 \$920,959 \$6,134,202 \$2,637,136 \$300,189 \$79,295
5. RECORDICEEPING REQUIREMENTS A. Read Instructions (Included in 4A) B. Plan Activities (Included in 4B) C. Implement Activities Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Rod Packing Change) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Route to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E) F. Train Personnel (Included in 5C)	1 4 2 4 1 8 2 1 1 8 8	1 1 1 1 1 1 1 1 1 6 4 4	1 4 1 2 4 1 8 2 16 4 32	2,328 40 2,110 1,234 542 1,626 43,321 2,328 1,060 35	2,328 160 2,110 0 4,936 542 13,008 86,642 37,248 4,240 1,120	582 116 8 106 0 247 27 650 4,332 1,862 212 56	233 16 211 0 494 54 1,301 8,664 3,725 424 112	\$164,821 \$11,328 \$149,387 \$0 \$349,466 \$38,373 \$920,959 \$6,134,202 \$2,637,136 \$300,189 \$79,295
5. RECORDREEPING REQUIREMENTS A. Read Instructions (Included in 4A) B. Plan Activities (Included in 4B) C. Implement Activities Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Rod Packing Change) Reciprocating Compressor (Rod Packing Change) Reciprocating Compressor (Rodue to Process) Pneumatic controllers Pneumatic pumps (uncontrolled) Pneumatic pumps (uncontrolled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plans Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E)	1 4 2 4 1 8 2 1 1 8 8	1 1 1 1 1 1 1 1 1 6 4 4	1 4 1 2 4 1 8 2 16 4 32	2,328 40 2,110 1,234 542 1,626 43,321 2,328 1,060 35	2,328 160 2,110 0 4,936 542 13,008 86,642 37,248 4,240 1,120 20	582 116 8 106 0 247 27 650 4,332 1,862 212 56 1	233 16 211 0 494 54 1,301 8,664 3,725 424 112 2 	\$164,821 \$11,328 \$149,387 \$0 \$349,466 \$38,373 \$920,959 \$6,134,202 \$2,637,136 \$300,189 \$79,295
5. RECORDKEEPING REQUIREMENTS A. Read Instructions (Included in 4A) B. Plan Activities (Included in 4B) C. Implement Activities Maintain completion log records Maintain 300 GOR exemption records Centrifugal Compressor (Route seal) Reciprocating Compressor (Route to Process) Pneumatic pumps (uncontrolled) Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Vell Sites Fugitive Emissions - Compressor Stations Processing Plants Swetering Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E) F. Train Personnel (Included in 5C)	1 4 2 4 1 8 2 1 1 8 8	1 1 1 1 1 1 1 1 1 6 4 4	1 4 1 2 4 1 8 2 16 4 32	2,328 40 2,110 1,234 542 1,626 43,321 2,328 1,060 35	2,328 160 2,110 0 4,936 542 13,008 86,642 37,248 4,240 1,120	582 116 8 106 0 247 27 650 4,332 1,862 212 56	233 16 211 0 494 54 1,301 8,664 3,725 424 112	\$164,821 \$11,328 \$149,387 \$0 \$349,466 \$38,373 \$920,959 \$6,134,202 \$2,637,136 \$300,189 \$79,295

2019 NSPS OOOOa EO 13783 Review Proposal Only Table 1b. Year 2 Respondent Burden of Reporting and Recordkeeping Requirements Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015 (40 CFR part 60, subpart OOOOa)

Year 1 I. APPLICATIONS (Not Applicable) 2. SURVEY AND STUDIES (Not Applicable)	(A)			art OOOOa)				
I. APPLICATIONS (Not Applicable)		(B)	(C)	(D)	(E)	(F)	(G)	(H)
I. APPLICATIONS (Not Applicable)		Number of	Person-Hours per		Technical Person-	Managerial	Clerical Person-	
	Person-Hours per	Occurrences per	Respondent per	Respondents per	Hours per Year	Person-Hours	Hours per Year	Cost per Year
	Occurrence	Respondent per	Year (A*B)	Year	(C*D)	per Year	(0.10*E)	
		Year			(= =)	(0.05*E)	(0120 2)	
SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AN	D SYSTEMS (Not A	Applicable)						
4. REPORT REQUIREMENTS								
A. Read Instructions								
New Affected Facilities	2	1	2	3,648	7,296	365	730	\$516,552
B. Required Activities			-		.,			4010,002
Notification of Well Completion/Recompletion	0.25	10	2.5	2,328	5,820	291	582	\$412,053
	0.5	10	0.5	8	4	0	0	\$283
Notification of Construction/Reconstruction/Modification	0.5	1	0.5	8	4	0	0	\$283
C. Create Information (Included in 5C)								
D. Gather Existing Information (Included in 5C)								
E. Annual Reports								
Well Completion/Recompletion	1	1	1	2,328	2,328	116	233	\$164,821
Centrifugal Compressor (Wet seal)	3	1	3	48	144	7	14	\$10,195
Reciprocating Compressor	1.5	1	2	2,532	3,798	190	380	\$268,896
Pneumatic Controllers	1	1	1	1,234	1,234	62	123	\$87,366
Pneumatic Pumps	2	1	2	2,168	4,336	217	434	\$306,986
Storage Vessel	2	1	2	2,433	4,866	243	434	\$344,510
					9,312		931	\$659,284
Well Site (Fugitives)	4	1	4	2,328		466		
Compressor Station (Fugitives)	4	1	4	1,272	5,088	254	509	\$360,227
Sweetening Unit	4	1	4	6	24	1	2	\$1,699
F. Semiannual Reports								
Gas Processing Plant	24	2	48	42	2,016	101	202	\$142,732
Description of the state					46,266	2,313	4,627	60.07F COF
Reporting Requirement Subtotal						53,206		\$3,275,605
5. RECORDKEEPING REQUIREMENTS								
A. Read Instructions (Included in 4A)								
B. Plan Activities (Included in 4B)								
		_						
C. Implement Activities								
Maintain completion log records	0.5	10	5	2,328	11,640	582	1,164	\$824,105
Maintain 300 GOR exemption records	1	1	1	2,328	2,328	116	233	\$164,821
Centrifugal Compressor (Wet seal)	4	1	4	48	192	10	19	\$13,593
Reciprocating Compressor (Rod Packing Change)	1	1	1	2,532	2,532	127	253	\$179,264
Reciprocating Compressor (Route to Process)	2	1	2	0	0	0	0	\$0
Pneumatic controllers	4	1	4	1,234	4,936	247	494	\$349,466
Pneumatic pumps (uncontrolled)	1	1	1	542	542	27	54	\$38,373
Pneumatic pumps (controlled)	8	1	8	1,626	13,008	650	1,301	\$920,959
	2	1	2	53,696	107,392	5,370	10,739	\$7,603,289
Stanger Vangele		-						
Storage Vessels	1	16	16	2,328	37,248	1,862	3,725	
Fugitive Emissions - Well Sites		4			= c	95.		\$2,637,136
Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations	1		4	1,272	5,088	254	509	\$360,227
Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants	8	4	32	42	1,344	67	509 134	\$360,227 \$95,154
Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations	-						509	\$360,227
Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants	8	4	32	42	1,344	67	509 134	\$360,227 \$95,154
Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweterning Units	8	4	32	42	1,344	67	509 134	\$360,227 \$95,154
Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information	8	4	32	42	1,344	67	509 134	\$360,227 \$95,154
Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E)	8	4	32	42	1,344	67	509 134	\$360,227 \$95,154
Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Swettening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E) F. Train Personnel (Included in 5C)	8	4	32	42	1,344	67	509 134	\$360,227 \$95,154
Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E)	8	4	32	42	1,344 24	67	509 134 2	\$360,227 \$95,154
Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Swettering Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E) F. Train Personnel (Included in 5C) G. Time for Audits (Not Applicable)	8	4	32	42	1,344	67 1 9,314	509 134	\$360,227 \$95,154 \$1,699
Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Swettening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E) F. Train Personnel (Included in 5C)	8	4	32	42	1,344 24 	67 1 9,314 214,215	509 134 2 	\$360,227 \$95,154
Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E) F. Train Personnel (Included in 5C) G. Time for Audits (Not Applicable) Recordkeeping Requirement Subtotal	8	4	32	42	1,344 24	67 1 9,314 214,215 11,627	509 134 2	\$360,227 \$95,154 \$1,699 \$13,188,087
Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Swettering Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E) F. Train Personnel (Included in 5C) G. Time for Audits (Not Applicable)	8	4	32	42	1,344 24 	67 1 9,314 214,215	509 134 2 	\$360,227 \$95,154 \$1,699

2019 NSPS OOOOa EO 13783 Review Proposal Only Table 1c. Year 3 Respondent Burden of Reporting and Recordkeeping Requirements Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015 (40 CFR part 60, subpart OOOOa)

			FR part 60, subpa					
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
		Number of	Person-Hours per		Technical	Managerial	Clerical Person-	
Year	Person-Hours per	Occurrences per	Respondent per	Respondents per	Person-Hours	Person-Hours	Hours per Year	Cost per Yea
	Occurrence	Respondent per	Year (A*B)	Year	per Year	per Year	(0.10*E)	Cost per rea
		Year	Teal (A. D)		(C*D)	(0.05*E)	(0.10 · E)	
. APPLICATIONS (Not Applicable)								
. SURVEY AND STUDIES (Not Applicable)								
ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY	AND SYSTEMS (No	t Applicable)						
. REPORT REQUIREMENTS								
	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·					r r	
A. Read Instructions	-		-					
New Affected Facilities	2	1	2	3,868	7,736	387	774	\$547,704
B. Required Activities		ļ						
Notification of Well Completion/Recompletion	0.25	10	2.5	2,328	5,820	291	582	\$412,053
Notification of Construction/Reconstruction/Modification	0.5	1	0.5	8	4	0	0	\$283
C. Create Information (Included in 5C)		ļ						
D. Gather Existing Information (Included in 5C)		ı						
E. Annual Reports		1						
Well Completion/Recompletion	1	1	1	2,328	2,328	116	233	\$164,821
Centrifugal Compressor (Wet seal)	3	1	3	56	168	8	17	\$11,894
Reciprocating Compressor	1.5	1	2	2,954	4,431	222	443	\$313,712
Pneumatic Controllers	1	1	1	1,234	1,234	62	123	\$87,366
Pneumatic Pumps	2	1	2	2,168	4,336	217	434	\$306,986
Storage Vessel	2	1	2	2,433	4,866	243	487	\$344,510
Well Site (Fugitives)	4	1	4	2,328	9,312	466	931	\$659,284
Compressor Station (Fugitives)	4	1	4	1,484	5,936	297	594	\$420,265
Sweetening Unit	4	1	4	7	28	1	3	\$1,982
F. Semiannual Reports								-
Gas Processing Plant	24	2	48	49	2,352	118	235	\$166,520
Gas i focessing i fait	24		40	45	48,551	2,428	4,855	\$100,520
Reporting Requirement Subtotal					48,551		4,855	\$3,437,382
						55,834		
. RECORDKEEPING REQUIREMENTS								
A. Read Instructions (Included in 4A)								
B. Plan Activities (Included in 4B)		1						
C. Implement Activities								
Maintain completion log records	0.5	10	5	2,328	11,640	582	1,164	\$824,105
Maintain 300 GOR exemption records	1	1	1	2,328	2,328	116	233	\$164,821
Centrifugal Compressor (Wet seal)	4	1	4	56	224	110	22	\$15,859
	1	1	4					
Reciprocating Compressor (Rod Packing Change)				2,954	2,954	148	295	\$209,141
Reciprocating Compressor (Route to Process)	2	1	2	0	0	0	0	\$0
Pneumatic controllers	4	1	4	1,234	4,936	247	494	\$349,466
	1	1	1	542	542	27	54	\$38,373
Pneumatic pumps (uncontrolled)								
Pneumatic pumps (uncontrolled) Pneumatic pumps (controlled)	8	1	8	1,626	13,008	650	1,301	\$920,959
Pneumatic pumps (controlled)								
Pneumatic pumps (controlled) Storage Vessels	2	1	2	64,458	128,916	6,446	12,892	\$9,127,175
Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites	2	1 16	2 16	64,458 2,328	128,916 37,248	6,446 1,862	12,892 3,725	\$9,127,175 \$2,637,136
Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations	2 1 1	1 16 4	2 16 4	64,458 2,328 1,484	128,916 37,248 5,936	6,446 1,862 297	12,892 3,725 594	\$9,127,175 \$2,637,136 \$420,265
Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants	2 1 1 8	1 16 4 4	2 16 4 32	64,458 2,328 1,484 49	128,916 37,248 5,936 1,568	6,446 1,862 297 78	12,892 3,725 594 157	\$9,127,175 \$2,637,136 \$420,265 \$111,013
Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units	2 1 1	1 16 4	2 16 4	64,458 2,328 1,484	128,916 37,248 5,936	6,446 1,862 297	12,892 3,725 594	\$9,127,175 \$2,637,136 \$420,265
Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units D. Record Data (Included in 5C)	2 1 1 8	1 16 4 4	2 16 4 32	64,458 2,328 1,484 49	128,916 37,248 5,936 1,568	6,446 1,862 297 78	12,892 3,725 594 157	\$9,127,175 \$2,637,136 \$420,265 \$111,013
Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units	2 1 1 8	1 16 4 4	2 16 4 32	64,458 2,328 1,484 49	128,916 37,248 5,936 1,568	6,446 1,862 297 78	12,892 3,725 594 157	\$9,127,175 \$2,637,136 \$420,265 \$111,013
Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units D. Record Data (Included in 5C)	2 1 1 8	1 16 4 4	2 16 4 32	64,458 2,328 1,484 49	128,916 37,248 5,936 1,568	6,446 1,862 297 78	12,892 3,725 594 157	\$9,127,175 \$2,637,136 \$420,265 \$111,013
Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units D. Record Data (Included in SC) E. Time to Transmit or Disclose Information	2 1 1 8	1 16 4 4	2 16 4 32	64,458 2,328 1,484 49	128,916 37,248 5,936 1,568	6,446 1,862 297 78	12,892 3,725 594 157	\$9,127,175 \$2,637,136 \$420,265 \$111,013
Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E) F. Train Personnel (Included in 5C)	2 1 1 8	1 16 4 4	2 16 4 32	64,458 2,328 1,484 49	128,916 37,248 5,936 1,568	6,446 1,862 297 78	12,892 3,725 594 157	\$9,127,175 \$2,637,136 \$420,265 \$111,013
Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E) F. Train Personnel (Included in 5C) G. Time for Audits (Not Applicable)	2 1 1 8	1 16 4 4	2 16 4 32	64,458 2,328 1,484 49	128,916 37,248 5,936 1,568 28	6,446 1,862 297 78 1	12,892 3,725 594 157 3	\$9,127,175 \$2,637,136 \$420,265 \$111,013 \$1,982
Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E) F. Train Personnel (Included in 5C)	2 1 1 8	1 16 4 4	2 16 4 32	64,458 2,328 1,484 49	128,916 37,248 5,936 1,568	6,446 1,862 297 78 1 	12,892 3,725 594 157	\$9,127,175 \$2,637,136 \$420,265 \$111,013 \$1,982
Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E) F. Train Personnel (Included in 5C) G. Time for Audits (Not Applicable)	2 1 1 8	1 16 4 4	2 16 4 32	64,458 2,328 1,484 49	128,916 37,248 5,936 1,568 28 209,328	6,446 1,862 297 78 1 	12,892 3,725 594 157 3 20,933	\$9,127,175 \$2,637,136 \$420,265 \$111,013
Pneumatic pumps (controlled) Storage Vessels Fugitive Emissions - Well Sites Fugitive Emissions - Compressor Stations Processing Plants Sweetening Units D. Record Data (Included in 5C) E. Time to Transmit or Disclose Information Records required by standards (Included in 4E) F. Train Personnel (Included in 5C) G. Time for Audits (Not Applicable)	2 1 1 8	1 16 4 4	2 16 4 32	64,458 2,328 1,484 49	128,916 37,248 5,936 1,568 28	6,446 1,862 297 78 1 	12,892 3,725 594 157 3	\$9,127,175 \$2,637,136 \$420,265 \$111,013 \$1,982

2019 NSPS OOOOa EO 13783 Review Proposal Only

Table 1d. Three-Year Average Respondent Burden of Reporting and Recordkeeping Requirements Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015 (40 CFR part 60, subpart OOOOa)

Year	Total Respondents	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours	Labor Cost
1 (2019)	3,428	207,975	10,399	20,798	239,171	\$14,724,505
2 (2020)	3,648	232,540	11,627	23,254	267,421	\$16,463,692
3 (2021)	3,868	257,879	12,894	25,788	296,561	\$18,257,678
Total	10,944	698,394	34,920	69,839	803,153	\$49,445,876
Average	3,648	232,798	11,640	23,280	267,718	\$16,481,959

2019 NSPS OOOOa EO 13783 Review Proposal Only Table 2a. Year 1 Annual Burden and Cost to the Federal Government Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015 (40 CFR part 60, subpart OOOOa)

	1		-	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	,			
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-	No. of	EPA person-	Responses	Technical	Management	Clerical	Cost,\$ (b)
	hours per	occurrences	hours per	per	person-hours	person-hours	person-	
	occurrence	per plant	plant per	year (a)	per year	per year	hours per	
		per year	year		(E=CxD)	(Ex0.05)	year	
Activity			(C=AxB)				(Ex0.1)	
Report Review								
Notification of Construction/Reconstruction/Modification	0.5	1.0	0.5	8	4	0	0	\$214
Annual Report	4.0	1.0	4.0	2,672	10,688	534	1,069	\$570,739
Semiannual Report	4.0	2.0	8.0	28	224	11	22	\$11,962
TOTAL ANNUAL BURDEN					10,916	546	1,092	\$582,914
TOTAL ANNUAL BURDEN						12,553		\$302,914

^a We have assumed that the number of respondents that will be subject to subpart OOOOa in this year will be 2,700 owners and operators. This is based on 2,328 exploration and production businesses, 420 compressor stations, 28 processing plants, and 4 sweetening unit.

^b The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$64.16 (GS-13, Step 5, \$40.10 × 1.6), Technical rate of \$47.62 (GS-12, Step 1, \$29.76 × 1.6), and Clerical rate of \$25.76 (GS-6, Step 3, \$16.10 × 1.6). These rates are from the Office of Personnel Management (OPM), 2016 General Schedule, which excludes locality rates of pay.

2019 NSPS OOOOa EO 13783 Review Proposal Only Table 2b. Year 2 Annual Burden and Cost to the Federal Government Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after Sentember 18, 2015 (40 CER part 60, subpart OOOOa)

alter	september 10,	2013 (40 CFK	part ov, subp					
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-	No. of	EPA person-	Responses	Technical	Management	Clerical	Cost,\$ (b)
	hours per	occurrences	hours per	per	person-hours	person-hours	person-	
	occurrence	per plant	plant per	year (a)	per year	per year	hours per	
		per year	year		(E=CxD)	(Ex0.05)	year	
Activity			(C=AxB)				(Ex0.1)	
Report Review								
Notification of Construction/Reconstruction/Modification	0.5	1.0	0.5	8	4	0	0	\$214
Annual Report	4.0	1.0	4.0	2,858	11,432	572	1,143	\$610,469
Semiannual Report	4.0	2.0	8.0	35	280	14	28	\$14,952
TOTAL ANNUAL BURDEN					11,716	586	1,172	\$625,634
IOTAL ANNUAL BURDEN						13,473		\$025,054

^a We have assumed that the number of respondents that will be subject to subpart OOOOa in this year will be 2,893 owners and operators. This is based on 2,328 exploration and production businesses, 525 compressor stations, 35 processing plants, and 5 sweetening units.

^b The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$64.16 (GS-13, Step 5, \$40.10 × 1.6), Technical rate of \$47.62 (GS-12, Step 1, \$29.76 × 1.6), and Clerical rate of \$25.76 (GS-6, Step 3, \$16.10 × 1.6). These rates are from the Office of Personnel Management (OPM), 2016 General Schedule, which excludes locality rates of pay.

	2019 NSPS	0000a E0	13783 Review	v Proposal On	dy			
Table	2c. Year 3 A	nnual Burden	and Cost to t	he Federal Go	overnment			
Standards of Performance for Crude C	il and Natura	l Gas Facilitie	s for which Co	onstruction, M	Iodification, or	Reconstructi	on Commence	ed
a	fter Septemb	er 18, 2015 (4	0 CFR part 60	, subpart OO	OOa)			
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-	No. of	EPA person-	Responses	Technical	Management	Clerical	Cost,\$ (b)
	hours per	occurrences	hours per	per	person-hours	person-hours	person-	
	occurrence	per plant	plant per	year (a)	per year	per year	hours per	
		per year	year		(E=CxD)	(Ex0.05)	year	
Activity			(C=AxB)				(Ex0.1)	
Report Review								
Notification of Construction/Reconstruction/Modification	0.5	1.0	0.5	8	4	0	0	\$214
Annual Report	4.0	1.0	4.0	2,964	11,856	593	1,186	\$633,110
Semiannual Report	4.0	2.0	8.0	42	336	17	34	\$17,942
TOTAL ANNUAL BURDEN					12,196	610	1,220	\$651,266
IOTAL ANNUAL BURDEN						14,025		\$051,200

^a We have assumed that the number of respondents that will be subject to subpart OOOOa in this year will be 3,006 owners and operators. This is based on 2,328 exploration and production businesses, 630 compressor stations, 42 processing plants, and 6 sweetening units.

^b The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$64.16 (GS-13, Step 5, \$40.10 × 1.6), Technical rate of \$47.62 (GS-12, Step 1, \$29.76 × 1.6), and Clerical rate of \$25.76 (GS-6, Step 3, \$16.10 × 1.6). These rates are from the Office of Personnel Management (OPM), 2016 General Schedule, which excludes locality rates of pay.

Stand			Burden and Cost to the F al Gas Facilities for whi		ication.					
Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015 (40 CFR part 60, subpart OOOOa)										
Year	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours	Labor Cos					
1 (2019)	10,916	1,092	546	12,553	\$582,914					
2 (2020)	11,716	1,172	586	13,473	\$625,634					
3 (2021)	12,196	1,220	610	14,025	\$651,266					
Total	34,828	3,483	1,741	40,052	\$1,859,81					
Average	11,609	1,161	580	13,351	\$619,938					

Appendix D

Draft Estimate of New Sources Affected for purposes of the Information Collection Request under the Proposed Amendments to 40 CFR Part 60, Subpart OOOOa.

DRAFT MEMORANDUM

TO: EPA Docket No. EPA-HQ-OAR-2017-0483

DATE: March 7, 2019

SUBJECT: Draft Estimate of New Sources Affected for purposes of the Information Collection Request under the Proposed Amendments to 40 CFR Part 60, Subpart OOOOa.

INTRODUCTION

On June 3, 2016, the Environmental Protection Agency (EPA) published a final rule titled "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources; Final Rule" (81 FR 35824). Following promulgation of this rule, which is contained in 40 CFR part 60, subpart OOOOa, EPA received petitions for reconsideration and EPA granted reconsideration on several issues. In addition, the March 2017 Executive Order 13783 required EPA to evaluate subpart OOOOa with attention to whether the rule "unduly burden[s] the development of domestic energy resources beyond the degree necessary to protect the public interest" and, if so, appropriately "suspend, revise, or rescind" regulatory requirements. As revisions are proposed by EPA in response to this reconsideration and review, it is necessary to estimate the impact on the burden associated with information collection activities to comply with the Paperwork Reduction Act. The purpose of this supplemental memorandum is to present a summary of the methodology followed to estimate the number of certain new sources that would be affected facilities subject to subpart OOOOa prior to any amendments and the results. The updated number of affected facilities results in a new baseline to estimate the burden impacts associated with any proposed changes to subpart OOOOa. Specifically, this memorandum presents the estimated number of pneumatic controllers, reciprocating compressors, and centrifugal compressors that have become subject to subpart OOOOa each year since the promulgation of the rule in 2016, and the number that will be expected in the future. These estimates are separated by those sources in the transmission and storage (T&S) and production and processing (P&P) segments of the industry. Section 2 provides the estimates of the number of new affected sources expected each year, and Section 3 provides the total number of sources that would be subject in the absence of any changes to the rule. Note that the number of facilities for purposes of identifying the burden of information collection activities is different that the number of facilities analyzed for purposes of the Regulatory Impact Analysis (RIA). While the burden associated with information collection is calculated for the total number of facilities reporting to comply with 40 CFR part 60, subpart OOOOa, for purpose of the RIA, main impacts are analyzed looking at the incremental changes of the standards that are changing.

SUMMARY OF POPULATION

Tables 2-1 provides a summary of the estimate of the number of new pneumatic controllers, reciprocating compressors, and centrifugal compressors that would be subject to the 2018 NSPS OOOOa annually for all segments of the industry, by source and segment. The methodology for these estimates is provided following the table.

2018 New	Affected Faci	lities per Year	ı	
Source	T&S	%T&Sª	P&P	All Segments
Pneumatic Controllers	308	20%	1,234	1,542
Reciprocating Compressors	76	15%	422	498
Centrifugal Compressors (wet seal)	18	70%	8	26

Table 2-1. Estimate of New Sources Affected under the Proposed Amendments to40 CFR Part 60, subpart OOOOa.

^aPercentage of population in the T&S segment in the most recent U.S. and Greenhouse Gas (GHG) Emissions and Sinks inventory (1990-2016).

To estimate the number of new sources shown in Table 2-1, the following approach was

used:

1. The number of T&S sources was provided by EPA Economists. These numbers were estimated using the April 2018 release of the GHG Inventory. EPA estimated the number of each new source by averaging the increases in the year-to-year changes in total national counts of each set of equipment over the 10-year period from 2004 through 2014. Year-to-year increases were assumed to represent newly constructed facilities. Decreases in total counts were represented as zeros for that year and averaged together with the annual increases. This approach results in the same number of new sources in each projected year, regardless of increases or decreases in Annual Energy Outlook projected drilling or production. This approach may result in an underestimate of total new and modified sources for two reasons: (1) modifications are not captured, and (2) if sources are taken offline and replaced with new facilities, those would not be reflected in the net increase in the year-to-year total. The national equipment counts estimated in the GHG Inventory are

not disaggregated by state, therefore, activity data using this approach is only estimated at the national level.

- Activity data were obtained for petroleum and natural gas systems sources from Tables
 3.5-5 and 3.6-7 of the Annexes of the most recent U.S. and Greenhouse Gas Emissions and Sinks inventory (<u>https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-</u> <u>emissions-and-sinks-1990-2016</u>).
- 3. The 2016 activity data (the most recent available year) for pneumatic controllers, reciprocating compressors, and centrifugal compressors (wet seal from the production, processing, transmission, and storage segment were extracted from Tables 3.5-5 and 3.6-7 and totaled by source and by segment. A summary of the information extracted from Tables 3.5-5 and 3.6-7 is provided in Appendix A to this memorandum.
- 4. For each source (i.e., pneumatic controllers, reciprocating compressors, and centrifugal compressors (wet seal)), the fraction that exists in the T&S segment was calculated.
- 5. The fraction that exists in the T&S segment estimated in step 4 was applied to the number of T&S sources provided by EPA Economists to determine the total number of sources in all segments. The resulting total represents the number of sources in all segments including P&P.

Appendix A provides a spreadsheet that contains the relevant activity data extracted from the Annexes of the most recent Greenhouse Gas Emissions and Sinks inventory Tables 3.5-5 and 3.6-7.

SUMMARY

Tables 3-1 provides the estimated number of sources that would be subject to the 2018 NSPS OOOOa.

Source	New Affected Facilities		Cun	nulative Ni	umber of S	ubject Sou	irces	
	Each Year	2015	2016	2017	2018	2019	2020	2021
Pneumatic Controllers								
Transmission & Storage	308	308	308	308	308	308	308	308
Production & Processing	1,234	1,234	1,234	1,234	1,234	1,234	1,234	1,234
Total	1,542	1,542	1,542	1,542	1,542	1,542	1,542	1,542
Reciprocating Compre	ssors							
Transmission & Storage	76	76	152	228	304	380	456	532
Production & Processing	422	422	844	1,266	1,688	2,110	2,532	2,954
Total	498	498	996	1,494	1,992	2,490	2,988	3,486
Centrifugal Compresso	ors				•	•	•	•
Transmission & Storage	18	18	36	54	72	90	108	126
Production & Processing	8	8	16	24	32	40	48	56
Total	26	26	52	78	104	130	156	182

Table 3-1. Estimate of Total Number of Sources Affected under the ProposedAmendments to 40 CFR Part 60, subpart OOOOa.

APPENDIX A

Summary of Activity Data for Petroleum and Natural Gas Systems Sources Obtained from Tables 3.5-5 and 3.6-7 of the Annexes of the 2018 U.S. and Greenhouse Gas Emissions and Sinks inventory

Segment/Source		2016	
	Petroleum Systems	Natural Gas Systems	Total
Production			
High Bleed Controllers	17,743	23,859	41,602
Processing			
High Bleed Controllers		N/A	
Transmission			
High Bleed Controllers	N/A	3,520	3,520
Storage			
High Bleed Controllers	N/A	6,865	6,865
Total High Bleed Controllers	17,743	34,245	51,988
% High Bleed Controllers in T&S	N/A	30%	20%
Production			
Reciprocating Compressors	N/A	33,574	33,574
Processing			
Reciprocating Compressors	N/A	4,084	4,084
Transmission			
Reciprocating Compressors	N/A	5,301	5,301
Storage			
Reciprocating Compressors	N/A	1,478	1,478
Total Reciprocating Compressors	N/A	10,863	44,437
% Reciprocating Compressors in T&S	N/A	62%	15%
Production			
Centrifugal Compressors (wet seal)	N/A	N/A	N/A
Processing			
Centrifugal Compressors (wet seal)	N/A	337	337
Transmission		• • • • •	
Centrifugal Compressors (wet seal)	N/A	804	804
Storage			
Centrifugal Compressors (wet seal)	N/A	N/A	N/A
Total Centrifugal Compressors	N/A	1,142	1,142
% Centrifugal Compressors in T&S	N/A	70%	70%