

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 three-year 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)(1).

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

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 ≤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
Read instructions/rule.
Gather relevant information.
Perform initial performance test and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing 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.
Transmit, 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).

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

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

^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.

(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 Affected Facilities per year in Transmission and Storage ^{a, b, c}		
	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)	\$16,886,648	\$16,481,959	\$14,549,843	\$14,177,438
% Reduction from 2016 NSPS OOOOa Updated Baseline				2%
% Reduction from 2016 Updated Baseline + 2018 NSPS 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.

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

Year	(A) Person-Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Person-Hours per Respondent per Year (A*B)	(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
1. APPLICATIONS (Not Applicable)								
2. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS (Not Applicable)								
4. REPORT REQUIREMENTS								
A. Read Instructions/Rule								
New Affected Facilities	2	1	2	3,428	6,856	343	686	\$485,401
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	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 Units	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	4,398	\$3,113,828
						50,578		
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	40	160	8	16	\$11,328
Reciprocating Compressor (Rod Packing Change)	1	1	1	2,110	2,110	106	211	\$149,387
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	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
Compressor Station (Fugitives)	1	2	2	1,060	2,120	106	212	\$150,095
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)								
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					131,868	6,593	13,187	\$9,336,175
						151,648		
TOTAL REPORTING AND RECORDKEEPING LABOR AND COST					175,849	8,792	17,585	\$12,450,004
						202,226		

Assumptions:

- 8 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 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 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
after September 18, 2015 (40 CFR part 60, subpart OOOOa)

Year	(A) Person-Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Person-Hours per Respondent per Year (A*B)	(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
1. APPLICATIONS (Not Applicable)								
2. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS (Not Applicable)								
4. 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	\$268,896
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	487	\$344,510
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	\$360,227
Sweetening Units	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
Reporting Requirement Subtotal					46,266	2,313	4,627	\$3,275,605
					53,206			
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)	1	1	1	1,626	1,626	81	163	\$115,120
Storage Vessels	2	1	2	53,696	107,392	5,370	10,739	\$7,603,289
Fugitive Emissions - Well Sites	1	8	8	2,328	18,624	931	1,862	\$1,318,568
Compressor Station (Fugitives)	1	2	2	1,272	2,544	127	254	\$180,114
Processing Plants	8	4	32	42	1,344	67	134	\$95,154
Sweetening Units	4	1	4	6	24	1	2	\$1,699
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					153,724	7,686	15,372	\$10,883,567
					176,783			
TOTAL REPORTING AND RECORDKEEPING LABOR AND COST					199,990	10,000	19,999	\$14,159,172
					229,989			

Assumptions:

- 8 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 facilities 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
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) Person-Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Person-Hours per Respondent per Year (A*B)	(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
1. APPLICATIONS (Not Applicable)								
2. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS (Not Applicable)								
4. REPORT REQUIREMENTS								
A. Read Instructions/Rule								
New Affected Facilities	2	1	2	3,868	7,736	387	774	\$547,704
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	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								
Gas Processing Plant	24	2	48	49	2,352	118	235	\$166,520
Reporting Requirement Subtotal					48,551	2,428	4,855	\$3,437,382
					55,834			
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)								
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					176,354	8,818	17,635	\$12,485,757
					224,905	11,245	22,491	\$15,923,139
TOTAL REPORTING AND RECORDKEEPING LABOR AND COST					258,641			

Assumptions:

- 8 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 facilities 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)**

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

^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)**

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Responses per year	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost (\$) ^a
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
					16,979			

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

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Responses per year	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost (\$) ^a
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
					18,023			

^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

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

Year	(A)	(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
1. APPLICATIONS (Not Applicable)								
2. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS (Not Applicable)								
4. 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
Reporting Requirement Subtotal					46,269	2,313	4,627	\$3,275,817
					53,209			
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	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)	8	1	8	1,626	13,008	650	1,301	\$920,959
Storage Vessels	2	1	2	43,321	86,642	4,332	8,664	\$6,134,202
Fugitive Emissions - Well Sites	1	16	16	2,328	37,248	1,862	3,725	\$2,637,136
Fugitive Emissions - Compressor Stations	1	4	4	1,250	5,000	250	500	\$353,997
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)								
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					166,726	8,336	16,673	\$11,804,101
					191,735			
TOTAL REPORTING AND RECORDKEEPING LABOR AND COST					212,995	10,650	21,300	\$15,079,918
					244,944			

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)

Year	(A)	(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
1. APPLICATIONS (Not Applicable)								
2. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS (Not Applicable)								
4. REPORT REQUIREMENTS								
A. Read Instructions								
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 ¹	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 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
Reporting Requirement Subtotal					48,950	2,448	4,895	\$3,465,631
					56,293			
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	156	624	31	62	\$44,179
Reciprocating Compressor (Rod Packing Change)	1	1	1	2,988	2,988	149	299	\$211,549
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)	8	1	8	1,626	13,008	650	1,301	\$920,959
Storage Vessels	2	1	2	53,696	107,392	5,370	10,739	\$7,603,289
Fugitive Emissions - Well Sites	1	16	16	2,328	37,248	1,862	3,725	\$2,637,136
Fugitive Emissions - Compressor Stations	1	4	4	1,500	6,000	300	600	\$424,796
Processing Plants	8	4	32	42	1,344	67	134	\$95,154
Sweetening Units	4	1	4	6	24	1	2	\$1,699
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					189,306	9,465	18,931	\$13,402,751
					217,702			
TOTAL REPORTING AND RECORDKEEPING LABOR AND COST					238,256	11,913	23,826	\$16,868,382
					273,994			

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

Year	(A)	(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
1. APPLICATIONS (Not Applicable)								
2. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS (Not Applicable)								
4. 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
					59,376			
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	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)	8	1	8	1,626	13,008	650	1,301	\$920,959
Storage Vessels	2	1	2	64,458	128,916	6,446	12,892	\$9,127,175
Fugitive Emissions - Well Sites	1	16	16	2,328	37,248	1,862	3,725	\$2,637,136
Fugitive Emissions - Compressor Stations	1	4	4	1,750	7,000	350	700	\$495,596
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					212,660	10,633	21,266	\$15,056,200
					244,559			
					264,291	13,215	26,429	\$18,711,644
TOTAL REPORTING AND RECORDKEEPING LABOR AND COST					303,935			

2016 NSPS OOOOa - Updated Baseline

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)	3,618	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)

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Responses per year (a)	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost,\$ (b)
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
						12,553		

^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)

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Responses per year (a)	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost,\$ (b)
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
						13,473		

^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.

2016 NSPS OOOOa - Updated Baseline
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 September 18, 2015 (40 CFR part 60, subpart OOOOa)

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Responses per year (a)	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost,\$ (b)
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
						14,025		

^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.

2016 NSPS OOOOa - Updated Baseline					
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 (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)

Year	(A)	(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
1. APPLICATIONS (Not Applicable)								
2. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS (Not Applicable)								
4. REPORT REQUIREMENTS								
A. Read Instructions/Rule								
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 Units	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					46,269	2,313	4,627	\$3,275,817
					53,209			
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	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)								
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					134,220	6,711	13,422	\$9,502,695
					154,353			
TOTAL REPORTING AND RECORDKEEPING LABOR AND COST					180,489	9,024	18,049	\$12,778,513
					207,562			

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 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	(A)	(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
1. APPLICATIONS (Not Applicable)								
2. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS (Not Applicable)								
4. REPORT REQUIREMENTS								
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								
Gas Processing Plant	24	2	48	42	2,016	101	202	\$142,732
Reporting Requirement Subtotal					48,950	2,448	4,895	\$3,465,631
						56,293		
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	156	624	31	62	\$44,179
Reciprocating Compressor (Rod Packing Change)	1	1	1	2,988	2,988	149	299	\$211,549
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	53,696	107,392	5,370	10,739	\$7,603,289
Fugitive Emissions - Well Sites	1	8	8	2,328	18,624	931	1,862	\$1,318,568
Fugitive Emissions - Compressor Stations	1	2	2	1,500	3,000	150	300	\$212,398
Processing Plants	8	4	32	42	1,344	67	134	\$95,154
Sweetening Units	4	1	4	6	24	1	2	\$1,699
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					156,300	7,815	15,630	\$11,065,946
						179,745		
TOTAL REPORTING AND RECORDKEEPING LABOR AND COST					205,250	10,263	20,525	\$14,531,577
						236,038		

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

Year	(A) Person-Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Person-Hours per Respondent per Year (A*B)	(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
1. APPLICATIONS (Not Applicable)								
2. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS (Not Applicable)								
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	5,163	\$3,655,444
						59,376		
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	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	17,915	\$12,683,996
						206,027		
TOTAL REPORTING AND RECORDKEEPING LABOR AND COST					230,785	11,539	23,079	\$16,339,440
						265,403		

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)

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

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

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

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Responses per year	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost (\$) ^a
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	\$837,098
						18,027		

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

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Responses per year	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost (\$) ^a
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
						19,246		

^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) Person-Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Person-Hours per Respondent per Year (A*B)	(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
1. APPLICATIONS (Not Applicable)								
2. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS (Not Applicable)								
4. REPORT REQUIREMENTS								
A. Read Instructions								
New Affected Facilities	2	1	2	3,428	6,856	343	686	\$485,401
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	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	4,398	\$3,113,828
					50,578			
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	40	160	8	16	\$11,328
Reciprocating Compressor (Rod Packing Change)	1	1	1	2,110	2,110	106	211	\$149,387
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
Storage Vessels	2	1	2	43,321	86,642	4,332	8,664	\$6,134,202
Fugitive Emissions - Well Sites	1	16	16	2,328	37,248	1,862	3,725	\$2,637,136
Fugitive Emissions - Compressor Stations	1	4	4	1,060	4,240	212	424	\$300,189
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)								
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					163,994	8,200	16,399	\$11,610,677
					188,593			
TOTAL REPORTING AND RECORDKEEPING LABOR AND COST					207,975	10,399	20,798	\$14,724,505
					239,171			

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	(A) Person-Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Person-Hours per Respondent per Year (A*B)	(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
1. APPLICATIONS (Not Applicable)								
2. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS (Not Applicable)								
4. REPORT REQUIREMENTS								
A. Read Instructions								
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 ¹	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	487	\$344,510
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	\$360,227
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
Reporting Requirement Subtotal					46,266	2,313	4,627	\$3,275,605
					53,206			
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
Storage Vessels	2	1	2	53,696	107,392	5,370	10,739	\$7,603,289
Fugitive Emissions - Well Sites	1	16	16	2,328	37,248	1,862	3,725	\$2,637,136
Fugitive Emissions - Compressor Stations	1	4	4	1,272	5,088	254	509	\$360,227
Processing Plants	8	4	32	42	1,344	67	134	\$95,154
Sweetening Units	4	1	4	6	24	1	2	\$1,699
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					186,274	9,314	18,627	\$13,188,087
					214,215			
TOTAL REPORTING AND RECORDKEEPING LABOR AND COST					232,540	11,627	23,254	\$16,463,692
					267,421			

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)

Year	(A)	(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
1. APPLICATIONS (Not Applicable)								
2. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS (Not Applicable)								
4. REPORT REQUIREMENTS								
A. Read Instructions								
New Affected Facilities	2	1	2	3,868	7,736	387	774	\$547,704
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	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
Reporting Requirement Subtotal					48,551	2,428	4,855	\$3,437,382
						55,834		
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)	8	1	8	1,626	13,008	650	1,301	\$920,959
Storage Vessels	2	1	2	64,458	128,916	6,446	12,892	\$9,127,175
Fugitive Emissions - Well Sites	1	16	16	2,328	37,248	1,862	3,725	\$2,637,136
Fugitive Emissions - Compressor Stations	1	4	4	1,484	5,936	297	594	\$420,265
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					209,328	10,466	20,933	\$14,820,297
						240,727		
TOTAL REPORTING AND RECORDKEEPING LABOR AND COST					257,879	12,894	25,788	\$18,257,678
						296,561		

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)**

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Responses per year (a)	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost,\$ (b)
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
						12,553		

^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.

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**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)**

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Responses per year (a)	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost,\$ (b)
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
						13,473		

^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 OOOOa EO 13783 Review Proposal Only								
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 September 18, 2015 (40 CFR part 60, subpart OOOOa)								
Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Responses per year (a)	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost,\$ (b)
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
						14,025		

^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.

2019 NSPS OOOOa EO 13783 Review Proposal Only					
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 (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 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

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 than 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 purposes 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.

Table 2-1. Estimate of New Sources Affected under the Proposed Amendments to 40 CFR Part 60, subpart OOOOa.

2018 New Affected Facilities per Year				
Source	T&S	%T&S^a	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

^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.

2. 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 (<https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2016>).
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.

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

Source	New Affected Facilities Each Year	Cumulative Number of Subject Sources						
		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 Compressors								
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 Compressors								
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

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%