

Supporting Statement A
30 CFR 250, Subpart I, Platforms and Structures
OMB Control Number 1014-0011
Current Expiration Date: July 31, 2020

Terms of Clearance: None

General Instructions

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question, "Does this information collection request (ICR) contain surveys, censuses, or employ statistical methods?" is checked "Yes," then a Supporting Statement B must be completed. The Office of Management and Budget (OMB) reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The Outer Continental Shelf (OCS) Lands Act (OCSLA) at 43 U.S.C. 1334 authorizes the Secretary of the Interior to prescribe rules and regulations necessary for the administration of the leasing provisions of that Act related to mineral resources on the OCS. Such rules and regulations will apply to all operations conducted under a lease, right-of-way, or a right-of-use and easement. Operations on the OCS must preserve, protect, and develop oil and natural gas resources in a manner that is consistent with the need to make such resources available to meet the Nation's energy needs as rapidly as possible; to balance orderly energy resource development with protection of human, marine, and coastal environments; to ensure the public a fair and equitable return on the resources of the OCS; and to preserve and maintain free enterprise competition.

In addition to the general rulemaking authority of the OCSLA at 43 U.S.C. 1334, section 301(a) of the Federal Oil and Gas Royalty Management Act (FOGRMA), 30 U.S.C. 1751(a), grants authority to the Secretary to prescribe such rules and regulations as are reasonably necessary to carry out FOGRMA's provisions. While the majority of FOGRMA is directed to royalty collection and enforcement, some provisions apply to offshore operations. For example, section 108 of FOGRMA, 30 U.S.C. 1718, grants the Secretary broad authority to inspect lease sites for the purpose of determining whether there is compliance with the mineral leasing laws. Section 109(c)(2) and (d)(1), 30 U.S.C. 1719(c)(2) and (d)(1), impose substantial civil penalties for failure to permit lawful inspections and for knowing or willful preparation or submission of false, inaccurate, or misleading reports, records, or other information. Because the Secretary has delegated some of the authority under FOGRMA to the Bureau of Safety and Environmental Enforcement (BSEE), 30 U.S.C. 1751 is included as additional authority for these requirements.

The Independent Offices Appropriations Act (31 U.S.C. 9701), the Omnibus Appropriations Bill (Pub. L. 104-133, 110 Stat. 1321, April 26, 1996), and OMB Circular A-25, authorize Federal agencies to

recover the full cost of services that confer special benefits. Under the Department of the Interior's implementing policy, BSEE is required to charge fees for services that provide special benefits or privileges to an identifiable non-Federal recipient above and beyond those which accrue to the public at large. Various applications and reports for Platform Verification Program, fixed structure, Caisson/Well Protector, and modification repairs are subject to cost recovery, and BSEE regulations specify service fees for these requests.

On November 2, 2015, the President signed into law the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015 (Sec. 701 of Pub. L. 114-74) (FCPIA of 2015). The OCSLA directs the Secretary of the Interior to adjust the OCSLA maximum civil penalty amount at least once every three years to reflect any increase in the Consumer Price Index (CPI) to account for inflation (43 U.S.C. 1350(b)(1)). The FCPIA of 2015 requires Federal agencies to adjust the level of civil monetary penalties with an initial "catch-up" adjustment, if warranted, through rulemaking and then to make subsequent annual adjustments for inflation. The purpose of these adjustments is to maintain the deterrent effect of civil penalties and to further the policy goals of the underlying statutes.

These authorities and responsibilities are among those delegated to BSEE. The regulations at 30 CFR 250, Subpart I, pertain to Platforms and Structures and are the subject of this collection. This request also covers the related Notices to Lessees and Operators (NTLs) that BSEE issues to clarify, supplement, or provide additional guidance on some aspects of our regulations.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

The BSEE uses the information submitted under Subpart I (see the burden table under A.12 to see what specific information BSEE collects) to determine the structural integrity of all OCS platforms and floating production facilities and to ensure that such integrity will be maintained throughout the useful life of these structures. We use the information to ascertain, on a case-by-case basis, that the fixed and floating platforms and structures are structurally sound and safe for their intended use to ensure safety of personnel and prevent pollution. More specifically, we use the information to:

- Review data concerning damage to a platform to assess the adequacy of proposed repairs.
- Review applications for platform construction (construction is divided into three phases—design, fabrication, and installation) to ensure the structural integrity of the platform.
- Review verification plans and third-party reports for unique platforms to ensure that all nonstandard situations are given proper consideration during the platform design, fabrication, and installation.
- Review platform design, fabrication, and installation records to ensure that the platform is constructed according to approved applications.
- Review inspection reports to ensure that platform integrity is maintained for the life of the platform.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for

adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.

Currently, 95 percent of all information is submitted and available electronically in the form of CDs, DVDs, and e-mail.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The information collected is unique to each lease, and similar information is not available from other sources. The DOI and other Government agencies have Memoranda of Understanding that defines the responsibilities of their agencies with respect to activities in the OCS. These are effective in avoiding duplication of regulations and reporting requirements.

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

This collection of information could have a significant economic effect on a substantial number of small entities. Any direct effects primarily impact the OCS lessees and operators. However, many of the OCS lessees and operators may have less than 500 employees and would be considered small businesses as defined by the Small Business Administration. Regulations require safe work practices and protection of the environmental resources; therefore, the hour burden on any small entity subject to these regulations and associated collection of information cannot be reduced to accommodate them.

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

If we did not collect the information, BSEE could not carry out the mandate of the OCSLA to determine if fixed and floating platforms and structures are structurally sound and safe. Design and reassessment information is only collected once or as changing conditions necessitate. Respondents generally submit reports as a result of situations encountered and not at any fixed or prescribed interval. Therefore, frequency is not applicable. Inspection information is collected annually. Less frequent collection will not permit us to monitor the integrity of platforms and structures.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

(a) requiring respondents to report information to the agency more often than quarterly;

For any other information not mentioned in A.6, respondents generally submit reports as a result of situations encountered and not at any fixed or prescribed interval.

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

Not applicable in this collection.

(c) requiring respondents to submit more than an original and two copies of any document;

The Platform Approval Program requires that respondents submit one complete copy and three abbreviated copies of the environmental and structural information if the facility is subject to the Platform Verification Program. The complete copy is reviewed and retained by the Office of Structural

and Technical Support (OSTS) in a special platform verification file. Of the three abbreviated copies, one is sent to the appropriate District Office for their review and comment; one is retained by OSTS in a platform file; and the last one is sent to the official lease file.

(d) requiring respondents to retain records, other than health, medical, government contract; grant-in-aid, or tax records, for more than 3 years;

The regulations in Subpart I require lessees to “. . . compile, retain, and make available . . . for the functional life of all platforms, the as-built structural drawings, the design assumptions and analyses, a summary of the nondestructive examination records, and the inspection results from platform inspections” The OCSLA requires the Secretary to issue regulations on the minimum standards of design, construction, alteration, and repair of structures in the OCS. Retaining this information for the “functional life of all platforms” is critical as the history of a structure has a substantial effect on determining its current safety, probable strength, and integrity. As platforms and structures age, we must have access to the initial structural properties and inspection results to determine whether necessary standards for safety are maintained. The type of information collected is such that it is not unreasonable to expect that respondents would retain it as usual and customary business practice.

(e) in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;

(f) requiring the use of statistical data classification that has been reviewed and approved by OMB;

(g) that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

Not applicable in this collection.

(h) requiring respondents to submit proprietary trade secrets or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information’s confidentiality to the extent permitted by law.

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

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency’s notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past 3 years and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information

activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

As required in 5 CFR 1320.8(d), BSEE provided a 60-day notice in the **Federal Register** on February 10, 2020 (85 FR 7586). Also, 30 CFR 250.199 explains that we will accept comments at any time on the information collection requirements and burdens of our 30 CFR 250 regulations. We display the OMB control number and provide the address for sending comments to BSEE. We received no comments in response to the **Federal Register** notice.

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

Freeport-McMoRan Oil & Gas, LLC, Operations Manager, (805) 934-8221, 201 S. Broadway, Orcutt, CA 93455-4606

Anadarko Petroleum, Corp., Regulatory Affairs Manager, (832) 636-8758, 1201 Lake Robbins Drive, The Woodlands, TX 77380

ANKOR Energy, LLC, Facilities Engineering Manager, (504) 596-3678, 1615 Poydras Street, Suite 1100, New Orleans, LA 70112

British Petroleum (BP-GoM), Regulatory Compliance & Permitting Team Lead, (832) 619-5040, 501 Westlake Park Boulevard, Houston, TX 77079

Chevron U.S.A., Inc., Shelf Operations Facility Engineering Team Lead, Gulf of Mexico SBU, (985) 773-6656, 100 Northpark Blvd., Covington, LA 70433

Fieldwood Energy, LLC, Sr. Regulatory Specialist, (713) 969-1310, 2000 W. Sam Houston Parkway S, Suite 1200, Houston, TX 77042

Shell Exploration & Production Company, Certification Team Lead, (504) 425-6071, 701 Poydras Street, Suite 3450, New Orleans, LA 70139

Stone Energy, Corp., Regulatory Manager, (337) 521-2197, 625 East Kaliste Saloom Rd., Lafayette, LA 70508

All the different reporting and recordkeeping requirements that are listed in the Subpart I burden table (Section A.12), were thoroughly reviewed by the company representatives listed.

These representatives had no other concerns regarding the availability of data, frequency of collection, clarity of instructions, and elements being collected at this time. The companies that replied to our request provided the burden estimates that are reflected in Section A.12.

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

BSEE will not provide payment or gifts to respondents in this collection.

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

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

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

This collection does not include questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

(a) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

(b) If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.

Potential respondents include Federal OCS oil, gas, or sulfur lessees and/or operators. It should be noted that not all of the potential respondents will submit information in any given year and some may submit multiple times. The burden estimates include the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing and reviewing the collection of information and are based on informal discussions with the listed respondents in Section A.8. Submissions are generally on occasion, as a result of situations encountered, and annually. Some responses are mandatory and some are required to obtain or retain a benefit. We estimate the total annual burden is 92,786 hours. Refer to the following table for a breakdown of the burdens.

BURDEN BREAKDOWN

Citation 30 CFR 250 Subpart I and related NTLs	Reporting and/or Recordkeeping Requirement*	Hour Burden	Average No. of Annual Reponses	Annual Burden Hours
		Non-Hour Cost Burdens		
900 thru 921	General departure and alternative compliance requests not specifically covered elsewhere in Subpart I regulations.	Burden covered under 30 CFR 250, Subpart A, 1014-0022.		0
900(b), (c),	Submit application, along with reports/surveys and relevant	552	43 applications	23,736

Citation 30 CFR 250 Subpart I and related NTLs	Reporting and/or Recordkeeping Requirement*	Hour Burden	Average No. of Annual Reponses	Annual Burden Hours
		Non-Hour Cost Burdens		
(e); 901(b); 905; 906; 910(c), (d); 911(c), (g); 912; 913; 919; NTL(s) [PAP 904- 908; PVP 909-918]	data, to install new platform or floating production facility or significant changes to approved applications, including but not limited to: summary of safety factors utilized in design of the platform; use of alternative codes, rules, or standards; CVA changes; and Platform Verification Program (PVP) plan for design, fabrication, and installation of new, fixed, bottom-founded, pile-supported, or concrete-gravity platforms and new floating platforms. Consult as required with BSEE and/or USCG. Re/Submit application for major modification(s)/repairs to any platform and obtain approval; and related requirements.	\$22,734 x 2 PVP = \$45,468		
		\$3,256 x 5 fixed structure = \$16,280		
		\$1,657 x 6 Caisson/Well Protector = \$9,942		
		\$3,884 x 30 modifications/repairs = \$116,520		
900(b)(4)	Submit application for approval to convert an existing platform for a new purpose.	66	2 applications	132
900(b)(5)	Submit application for approval to convert an existing mobile offshore drilling unit (MODU) for a new purpose.	37	1 application	37
900(c)	Notify BSEE within 24 hours of damage and emergency repairs and request approval of repairs. Submit written completion report within 1 week upon completion of repairs.	5	1 notices/ requests; reports	5
		9		9
900(e)	Submit platform installation date and the final as-built location data to the Regional Supervisor within 45 days after platform installation.	13	13 submittals	169
900(e)	Resubmit an application for approval to install a platform if it was not installed within 1 year after approval (or other date specified by BSEE).	42	1 application	42
901(b)	Request approval for alternative codes, rules, or standards.	Burden covered under 30 CFR 250, Subpart A, 1014-0022.		0
903	Record original and relevant material test results of all primary structural materials; retain records during all stages of construction. Compile, retain, and provide location/make available to BSEE for the functional life of platform, the as-built drawings, design assumptions/analyses, summary of nondestructive examination records, inspection results, and records of repair not covered elsewhere.	247	115 lessees	28,405
903(c); 905(k)	Submit certification statement [a certification statement is not considered information collection under 5 CFR 1320.3(h)(1); the burden is for the insertion of the location of the records on the statement and the submittal to BSEE].	This statement is submitted with the application.		0
911(c-e); 912(a-c); 914	Submit complete schedule of all phases of design, fabrication, and installation with required information; also submit Gantt Chart with required information and required nomination/documentation for CVA, or to be performed by CVA.	97	2 schedules	194
		\$400,000 x 2 = \$800,000 CVA costs		
912(a)	Submit design verification plans with your DPP or DOCD.	Burden covered under 30 CFR 550, Subpart B, 1010-0151.		0
913(a)	Resubmit a changed design, fabrication, or installation verification plan for approval.	28	2 plans	56
916(c)	Submit interim and final CVA reports and	168	16 reports	2,688

Citation 30 CFR 250 Subpart I and related NTLs	Reporting and/or Recordkeeping Requirement*	Hour Burden	Average No. of Annual Reponses	Annual Burden Hours
		Non-Hour Cost Burdens		
	recommendations on design phase.			
917(a), (c)	Submit interim and final CVA reports and recommendations on fabrication phase, including notices to BSEE and operator/lessee of fabrication procedure changes or design specification modifications.	180	12 reports	2,160
918(c)	Submit interim and final CVA reports and recommendations on installation phase.	79	8 reports	632
919(a)	Develop in-service inspection plan and keep on file. Submit annual (November 1 of each year) report on inspection of platforms or floating production facilities, including summary of testing results.	280	117 lessees	32,760
919(b) NTL	After an environmental event, submit to Regional Supervisor initial report followed by updates and supporting information.	37 (initial)	1 reports	37
		24 (update)	1 reports	24
919(c) NTL	Submit results of inspections, description of any damage, assessment of structure to withstand conditions, and remediation plans.	104	1 result	104
920(a)	Demonstrate platform is able to withstand environmental loadings for appropriate exposure category.	81	1 occurrence	81
920(c)	Submit application and obtain approval from the Regional Supervisor for mitigation actions (includes operational procedures).	87	1 application	87
920(e)	Submit a list of all platforms you operate, and appropriate supporting data, every 5 years or as directed by the Regional Supervisor.	60	115 operators / 5 years = 23 lists per year	1,380
920(f)	Obtain approval from the Regional Supervisor for any change in the platform.	48	1 approval	48
TOTAL BURDEN			362 Responses	92,786 Hours
			\$988,210 Non-Hour Cost Burdens	

* In the future, BSEE will be allowing the option of electronic reporting for certain requirements.

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

The average respondent cost is \$127/hour. This cost is broken out in the following table using the Society of Petroleum Engineers data updated 2019. See SPE document/website:

<https://www.spe.org/en/industry/oil-and-gas-salary-survey/>

Position	Base Pay Hourly Rate (\$/hr)	Hourly Pay Rate (including benefits) (1.4* x \$/hour)	Percent of time spent on collection	Weighted Average (\$/hour)/rounded
Non-Engineering Technical - Regulatory	\$62.67	\$87.74	21%	\$18.35
Engineering –	\$95.94	\$134.32	72%	\$96.71

Civil/Construction/Facilities				
Other or Combination of Above - Management	\$122.92	\$172.09	7%	\$12.05
Weighted Average (\$/hour)				\$127.11

* A multiplier of 1.4 (as implied by BLS news release USDL-20-0451, March 19, 2020 (see <http://www.bls.gov/news.release/ecec.nr0.htm>), was added for benefits.

Based on a cost factor of \$127 per hour, we estimate the hour burden as a dollar equivalent to industry is \$11,783,822 (\$127 x 92,786 hours = \$11,783,822).

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in Item 12).

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

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

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

We have identified non-hour cost burdens for various platform applications/installations that are associated with service fees (§ 250.125). The service fees are as follows: (1) \$22,734 for installation under the Platform Verification Program; (2) \$3,256 for installation of fixed structures under the Platform Approval Program; (3) \$1,657 for installation of Caisson/Well Protectors; and (4) \$3,884 for modifications and/or repairs.

The annual average non-hour costs associated with hiring CVAs under the Platform Verification Program is \$800,000 (12,000 + 20,000 = average 16,000 hours (\$200 per hour) / 2,000-man hours per year = 8 years. \$2.4 million + 4 million / 2 = \$3,200,000, the average cost per operator over 8 years. \$3,200,000 / 8 = approximately \$400,000 per operator per year x 2 schedules = 800,000 annual non-hour costs).

We have not identified any other non-hour cost burdens associated with this collection of information, and we estimate a total annual reporting non-hour cost burden of \$988,210. Refer to the chart in Section A.12 of this supporting statement for the specific fee breakdown.

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

The average Federal cost is \$79/hour. This cost is broken out in the following table using the current Office of Personnel Management salary data for the REST OF THE UNITED STATES (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/>).

Position	Grade	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.6 x \$/hour /rounded)*	% of time spent on collection	Weighted Average (\$/hour)
Clerical	GS-7/5	\$23.49	\$37.58	15%	\$5.64
Petroleum Engineer	GS-13/5	\$49.54	\$79.26	65%	\$51.52
Supv. Petroleum Engineer	GS-15/5	\$68.86	\$110.18	20%	\$22.04
Weighted Average (\$/hour)					\$79.20

* A multiplier of 1.6 (as implied by BLS news release USDL-20-0451, March 19, 2020 (see <http://www.bls.gov/news.release/ecec.nr0.htm>) was added for benefits.

To analyze and review the information required by 30 CFR Part 250, Subpart I, we estimate the Government will spend an average of 15 minutes for every 1 hour spent by lessees. Based on a cost factor of \$79 per hour, the annual cost to the Federal Government for the regulatory requirements in this collection is \$1,832,563 (92,786 burden hours x 15 minutes = 23,197 hours x \$79/hour = \$1,832,563).

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

The current approved OMB inventory for this collection includes 92,786 burden hours. In this submission, we are not requesting any changes to burden hour or non-hour costs.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

BSEE will not tabulate or publish the data.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

BSEE will display the OMB control number and approved expiration date.

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

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