

**Exhibit 1a. Year 1 Respondent Burden of Reporting and Recordkeeping Requirements
Federal Implementation Plan for Oil and Natural Gas Well Production Facilities; Fort Berthold Indian Reservation (Mandan, Hidatsa, and Arikara Nation), North Dakota**

Year	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)
	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)	Capital/Startup Cost ^a	O&M Cost ^{a,i}	Labor Cost ^b	Total Cost per Year
1. APPLICATIONS (Not Applicable)											
2. SURVEY AND STUDIES (Not Applicable)											
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS											
Continuous pilot or auto-ignition system with continuous monitoring/recording ^c	24	1	24	2221	53,304	2,665	5,330	\$3,470	\$5,073	\$2,215,474	\$21,189,477.15
4. RECORDKEEPING REQUIREMENTS											
A. Read Instructions											
Existing sources ^d	1	0.059	0.059	2000	118	6	12	\$0	\$0	\$4,904	\$4,904
New affected sources ^e	1	0.059	0	221	13	1	1	\$0	\$0	\$542	\$542
B. Required Activities											
Measure barrels of oil produced ^f	0	1	0	2221	0	0	0	\$0	\$0	\$0	\$0
Volume of produced natural gas sent to control device ^f	0	1	0	2221	0	0	0	\$0	\$0	\$0	\$0
Volume of natural gas emissions sent to control device	1	1	1	2221	2,221	111	222	\$0	\$0	\$92,311	\$92,311
Well completion and recompletion operations	2	1	2	2221	4,442	222	444	\$0	\$0	\$184,623	\$184,623
Control device monitoring and deviations	8	1	8	2221	17,768	888	1,777	\$0	\$0	\$738,491	\$738,491
Restricted use of pit flares ^g	0.5	0.059	0	2221	66	3	7	\$0	\$0	\$2,723	\$2,723
Closed-vent system or control device not operating ^g	0.5	0.059	0	2221	66	3	7	\$0	\$0	\$2,723	\$2,723
Produced oil and water storage tank inspections	4	1	4	2221	8,884	444	888	\$0	\$0	\$369,246	\$369,246
Records retention requirements	0.25	1	0	2221	555	28	56	\$0	\$0	\$23,078	\$23,078
C. Train Personnel	Included in 3										
Recordkeeping Requirement Subtotal					87,436	4,372	8,744	\$3,470	\$5,073	\$1,418,642	\$22,608,119
					100,552			\$8,543			
5. REPORTING REQUIREMENTS											
A. Read Instructions											
Included in 4A											
B. Required Activities											
Annual report ^h	20	0.059	1.18	937	1,106	55	111	\$0	\$0	\$45,955	\$45,955
C. Create information											
Included in 5B											
D. Gather existing information											
Included in 5B											
E. Write report											
Included in 5B											
Reporting Requirement Subtotal					1,106	55	111	\$0	\$0	\$45,955	\$45,955
					1,272			\$0			
					88,542	4,427	8,854	\$3,470	\$5,073	\$3,680,071	\$22,654,074
TOTAL REPORTING AND RECORDKEEPING LABOR AND COST					101,823			\$8,543			

^a Capital and O&M Costs are per respondent (1 respondent = 1 oil and natural gas production facility)

^b Costs are based on September 2018 Bureau of Labor Statistics, Employer Costs for Employee Compensation total compensation index which includes wages, salaries, and benefits. Costs are estimated using the following hourly rates: technical at \$35.92, management at \$59.82, and clerical at \$26.50. (Source: <http://www.bls.gov/news.release/ecec.toc.htm>, Table 2)

^c Annual total capital investment costs were determined using cost information and the appropriate CRF factor for the life expectancy of equipment provided by 2 of the FBIR operators. Additionally, annual O&M cost specific to auto-ignition systems and continuous pilot flame systems were provided by the 2 operators. There is no "purchase of services component" cost for the monitoring requirements in this FIP.

^d Existing sources in Year 1 are estimated to be 2,000 oil and natural gas facilities. This number was calculated using the total estimated number of existing sources subject to the FIP in April 2019. (Source: <https://info.drillinginfo.com/>)

^e New sources for Year 1 are estimated to be 221 oil and natural gas facilities. This is based on data available at <https://info.drillinginfo.com/> for 2016-2018. This estimate is consistent with the number of new facilities reported in annual reports and therefore suffices as an appropriate and accurate data source rather than manually tallying data from hard copy reports.

^f Burden for recordkeeping of measured barrels of oil and produced natural gas vented to flare is covered under another ICR for OMB Control Number 1012-0004.

^g Recordkeeping only required under specific circumstances which are not expected to occur regularly at each facility. The number of occurrences per respondent per year has been reduced to 0.059 to reflect this assumption.

^h The rule allows each owner/operator to submit a combined annual report for all of their respective facilities in 1 submittal once per year. Currently there are 17 known owners/operators subject to the FIP requirements. Therefore, we have reduced the number of occurrences per respondent per year to 0.059 to conservatively account for 1 submittal per each owner/operator for all of facilities subject to the FIP.

ⁱ O&M costs were adjusted from 2015 dollars to 2018 dollars for the ICR renewal

**Exhibit 1b. Year 2 Respondent Burden of Reporting and Recordkeeping Requirements
Federal Implementation Plan for Oil and Natural Gas Well Production Facilities; Fort Berthold Indian Reservation (Mandan, Hidatsa, and Arikara Nation), North Dakota**

Year	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)
	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)	Capital/Startup Cost ^a	O&M Cost ^{a,i}	Labor Cost ^b	Cost per Year
1. APPLICATIONS (Not Applicable)											
2. SURVEY AND STUDIES (Not Applicable)											
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS											
Continous pilot or auto-ignition system with continous monitoring/recording ^c	24	1	24	2,442	58,608	2,930	5,861	\$3,470	\$5,073	\$2,435,924	\$23,297,930
4. RECORDKEEPING REQUIREMENTS											
A. Read Instructions											
Existing sources ^d	0	0	0	2221	0	0	0	\$0	\$0	\$0	\$0
New affected sources ^e	1	0.059	0	221	13	1	1	\$0	\$0	\$542	\$542
B. Required Activities											
Measure barrels of oil produced ^f	0	1	0	2,442	0	0	0	\$0	\$0	\$0	\$0
Volume of produced natural gas sent to control device ^f	0	1	0	2,442	0	0	0	\$0	\$0	\$0	\$0
Volume of natural gas emissions sent to control device	1	1	1	2,442	2,442	122	244	\$0	\$0	\$101,497	\$101,497
Well completion and recompletion operations	2	1	2	2,442	4,884	244	488	\$0	\$0	\$202,994	\$202,994
Control device monitoring and deviations	8	1	8	2,442	19,536	977	1,954	\$0	\$0	\$811,975	\$811,975
Restricted use of pit flares ^g	0.5	0.059	0	2,442	72	4	7	\$0	\$0	\$2,994	\$2,994
Closed-vent system or control device not operating ^g	0.5	0.059	0	2,442	72	4	7	\$0	\$0	\$2,994	\$2,994
Produced oil and water storage tank inspections	4	1	4	2,442	9,768	488	977	\$0	\$0	\$405,987	\$405,987
Records retention requirements	0.25	1	0	2,442	611	31	61	\$0	\$0	\$25,374	\$25,374
C. Train Personnel											
Included in 3											
Recordkeeping Requirement Subtotal					96,006	4,800	9,601	\$3,470	\$5,073	\$1,554,357	\$24,852,287
					110,406		\$8,543				
68											
A. Read Instructions											
Included in 4A											
B. Required Activities											
Annual report ^h	20	0.059	1.18	1,094	1,291	65	129	\$0	\$0	\$53,655	\$53,655
C. Create information											
Included in 5B											
D. Gather existing information											
Included in 5B											
E. Write report											
Included in 5B											
Reporting Requirement Subtotal					1,291	65	129	\$0	\$0	\$53,655	\$53,655
					1,485		\$0				
TOTAL REPORTING AND RECORDKEEPING LABOR AND COST					97,297	4,865	9,730	\$3,470	\$5,073	\$4,043,936	\$24,905,942
					111,891		\$8,543				

^a Capital and O&M Costs are per respondent (1 respondent = 1 oil and natural gas production facility)

^b Costs are based on September 2018 Bureau of Labor Statistics, Employer Costs for Employee Compensation total compensation index which includes wages, salaries, and benefits. Costs are estimated using the following hourly rates: technical at \$35.92, management at \$59.82, and clerical at \$26.50. (Source: <http://www.bls.gov/news.release/ecoc.toc.htm>, Table 2)

^c Annual total capital investment costs were determined using cost information and the appropriate CRF factor for the life expectancy of equipment provided by 2 of the FBIR operators. Additionally, annual O&M cost specific to auto-ignition systems and continuous pilot flame systems were provided by the 2 operators. There is no "purchase of services component" cost for the monitoring requirements in this FIP.

^d Existing sources in Year 2 are estimated to be 2,221 oil and natural gas facilities based on Year 1 numbers. There is no cost for existing sources to read instructions because it is covered under prior year.

^e New sources for Year 2 are estimated to be 221 oil and natural gas facilities. This is based on data available at <https://info.drillinginfo.com/> for 2016-2018. This estimate is consistent with the number of new facilities reported in annual reports and therefore suffices as an appropriate and accurate data source rather than manually tallying data from hard copy reports.

^f Burden for recordkeeping of measured barrels of oil and produced natural gas vented to flare is covered under another ICR for OMB Control Number 1012-0004.

^g Recordkeeping only required under specific circumstances which are not expected to occur regularly at each facility. The number of occurrences per respondent per year has been reduced to 0.059 to reflect this assumption.

^h The rule allows each owner/operator to submit a combined annual report for all of their respective facilities in 1 submittal once per year. Currently there are 17 known owners/operators subject to the FIP requirements. Therefore, we have reduced the number of occurrences per respondent per year to 0.059 to conservatively account for 1 submittal per each owner/operator for all of facilities subject to the FIP.

ⁱ O&M costs were adjusted from 2015 dollars to 2018 dollars for the ICR renewal

**Exhibit 1c. Year 3 Respondent Burden of Reporting and Recordkeeping Requirements
Federal Implementation Plan for Oil and Natural Gas Well Production Facilities; Fort Berthold Indian Reservation (Mandan, Hidatsa, and Arikara Nation), North Dakota**

Year	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)
	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)	Capital/Startup Cost ^a	O&M Cost ^{a,i}	Labor Cost ^b	Cost per Year
1. APPLICATIONS (Not Applicable)											
2. SURVEY AND STUDIES (Not Applicable)											
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS											
Continous pilot or auto-ignition system with continous monitoring/recording ^c	24	1	24	2,663	63,912	3,196	6,391	\$3,470	\$5,073	\$2,656,247	\$25,406,255.63
4. RECORDKEEPING REQUIREMENTS											
A. Read Instructions											
Existing sources ^d	0	0	0	2442	0	0	0	\$0	\$0	\$0	\$0
New affected sources ^e	1	0.059	0	221	13	1	1	\$0	\$0	\$542	\$542
B. Required Activities											
Measure barrels of oil produced ^f	0	1	0	2,663	0	0	0	\$0	\$0	\$0	\$0
Volume of produced natural gas sent to control device ^f	0	1	0	2,663	0	0	0	\$0	\$0	\$0	\$0
Volume of natural gas emissions sent to control device	1	1	1	2,663	2,663	133	266	\$0	\$0	\$110,677	\$110,677
Well completion and recompletion operations	2	1	2	2,663	5,326	266	533	\$0	\$0	\$221,354	\$221,354
Control device monitoring and deviations	8	1	8	2,663	21,304	1,065	2,130	\$0	\$0	\$885,416	\$885,416
Restricted use of pit flares ^g	0.5	0.059	0	2,663	79	4	8	\$0	\$0	\$3,265	\$3,265
Closed-vent system or control device not operating ^g	0.5	0.059	0	2,663	79	4	8	\$0	\$0	\$3,265	\$3,265
Produced oil and water storage tank inspections	4	1	4	2,663	10,652	533	1,065	\$0	\$0	\$442,708	\$442,708
Records retention requirements	0.25	1	0	2,663	666	33	67	\$0	\$0	\$27,669	\$27,669
C. Train Personnel											
Included in 3											
Recordkeeping Requirement Subtotal					104,693	5,235	10,469	\$3,470	\$5,073	\$1,694,895	\$27,101,151
					120,397		\$8,543				
5. REPORTING REQUIREMENTS											
A. Read Instructions											
Included in 4A											
B. Required Activities											
Annual report ^h	20	0.059	1.18	1,251	1,476	74	148	\$0	\$0	\$61,352	\$61,352
C. Create information											
Included in 5B											
D. Gather existing information											
Included in 5B											
E. Write report											
Included in 5B											
Reporting Requirement Subtotal					1,476	74	148	\$0	\$0	\$61,352	\$61,352
					1,698		\$0				
TOTAL REPORTING AND RECORDKEEPING LABOR AND COST					106,169	5,308	10,617	\$3,470	\$5,073	\$4,412,493	\$27,162,502
					122,094		\$8,543				

^a Capital and O&M Costs are per respondent (1 respondent = 1 oil and natural gas production facility)

^b Costs are based on September 2018 Bureau of Labor Statistics, Employer Costs for Employee Compensation total compensation index which includes wages, salaries, and benefits. Costs are estimated using the following hourly rates: technical at \$35.92, management at \$59.82, and clerical at \$26.50. (Source: <http://www.bls.gov/news.release/ecoc.toc.htm>, Table 2)

^c Annual total capital investment costs were determined using cost information and the appropriate CRF factor for the life expectancy of equipment provided by 2 of the FBIR operators. Additionally, annual O&M cost specific to auto-ignition systems and continuous pilot flame systems were provided by the 2 operators. There is no "purchase of services component" cost for the monitoring requirements in this FIP.

^d Existing sources in Year 3 are estimated to be 2,442 oil and natural gas facilities based on Year 3 numbers. There is no cost for existing sources to read instructions because it is covered under the prior year.

^e New sources for Year 3 are estimated to be 221 oil and natural gas facilities. This is based on data available at <https://info.drillinginfo.com/> for 2016-2018. This estimate is consistent with the number of new facilities reported in annual reports and therefore suffices as an appropriate and accurate data source rather than manually tallying data from hard copy reports.

^f Burden for recordkeeping of measured barrels of oil and produced natural gas vented to flare is covered under another ICR for OMB Control Number 1012-0004.

^g Recordkeeping only required under specific circumstances which are not expected to occur regularly at each facility. The number of occurrences per respondent per year has been reduced to 0.059 to reflect this assumption.

^h The rule allows each owner/operator to submit a combined annual report for all of their respective facilities in 1 submittal once per year. Currently there are 17 known owners/operators subject to the FIP requirements. Therefore, we have reduced the number of occurrences per respondent per year to 0.059 to conservatively account for 1 submittal per each owner/operator for all of facilities subject to the FIP.

ⁱ O&M costs were adjusted from 2015 dollars to 2018 dollars for the ICR renewal

Exhibit 2a. Year 1 Agency Burden and Cost

Federal Implementation Plan for Oil and Natural Gas Well Production Facilities; Fort Berthold Indian Reservation (Mandan, Hidatsa, and Arikara Nation), North Dakota

Activity - Year 1	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA Hours per Occurrence	Number of Occurrences per Respondent per Year	EPA Hours per Respondent per Year (A*B)	Respondents per Year	EPA Technical Hours per Year (C*D)	EPA Managerial Hours per Year (0.05*E)	EPA Clerical Hours per Year (0.10*E)	EPA Cost per Year ^a
REPORTING REQUIREMENTS								
Review annual reports ^b	1	1	1	2,221	2,221	111	222	\$180,565
Total Annual Hours					2,221	111	222	\$180,565
					2,554			

^a Costs are based on January 2018 Office of Personnel Management salary table for General Schedule (GS) federal employees including locality payment of 25.47% for the Denver, Colorado area and have been increased by 60% to account for benefit packages. Costs are estimated using the following rates: technical at \$72.75, management at \$97.42, and clerical at \$36.78.

^b Assumes 1,338 oil and natural gas production facilities will submit annual reports in Year 1.

Exhibit 2b. Year 2 Agency Burden and Cost

Federal Implementation Plan for Oil and Natural Gas Well Production Facilities; Fort Berthold Indian Reservation (Mandan, Hidatsa, and Arikara Nation), North Dakota

Activity - Year 2	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA Hours per Occurrence	Number of Occurrences per Respondent per Year	EPA Hours per Respondent per Year (A*B)	Respondents per Year	EPA Technical Hours per Year (C*D)	EPA Managerial Hours per Year (0.05*E)	EPA Clerical Hours per Year (0.10*E)	EPA Cost per Year ^a
REPORTING REQUIREMENTS								
Review annual reports ^b	1	1	1	2,442	2,442	122	244	\$198,532
Total Annual Hours					2,442	122	244	\$198,532
					2,808			

^a Costs are based on January 2018 Office of Personnel Management salary table for General Schedule (GS) federal employees including locality payment of 25.7% for the Denver, Colorado area and have been increased by 60% to account for benefit packages. Costs are estimated using the following rates: technical at \$72.75, management at \$97.42, and clerical at \$36.78.

^b Assumes 1,475 oil and natural gas production facilities will submit annual reports in Year 2.

Exhibit 2c. Year 3 Agency Burden and Cost

Federal Implementation Plan for Oil and Natural Gas Well Production Facilities; Fort Berthold Indian Reservation (Mandan, Hidatsa, and Arikara Nation), North Dakota

Activity - Year 3	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA Hours per Occurrence	Number of Occurrences per Respondent per Year	EPA Hours per Respondent per Year (A*B)	Respondents per Year	EPA Technical Hours per Year (C*D)	EPA Managerial Hours per Year (0.05*E)	EPA Clerical Hours per Year (0.10*E)	EPA Cost per Year ^a
REPORTING REQUIREMENTS								
Review annual reports ^b	1	1	1	2,663	2,663	133	266	\$216,499
Total Annual Hours					2,663	133	266	\$216,499
					3,062			

^a Costs are based on January 2018 Office of Personnel Management salary table for General Schedule (GS) federal employees including locality payment of 25.7% for the Denver, Colorado area and have been increased by 60% to account for benefit packages. Costs are estimated using the following rates: technical at \$72.75, management at \$97.42, and clerical at \$36.78.

^b Assumes 1,695 oil and natural gas production facilities will submit annual reports in Year 3.

Conversion to 2018 Dollars.

used website: <https://research.stlouisfed.org/fred2/series/GDPDEF>

website gives the gross domestic product: implicit price deflator, Alex Macpherson from HQ recommended using this in
this was also used in 2016 ICR renewal

Q1: 2015 104.148

$111.190/104.148 = 1.068$ or 6.8%

Q4: 2018 111.19

(Dates used 01/01/2015 - 10/01/2018 October was the last available data for 2018)

(numbers pulled from website 04/16/2019)

Index to inflate 2012 dollars to 2015 dollars for the U&O FIP, was used in the CTGs to inflate dollars.

Summary of first production dates obtained from website: <https://info.drillinginfo.com/>

Total of approximately 2,000 wells and 17 operators are located within the exterior boundary of the Fort Berthold Inc

Year	Estimated Respondents/Facilities	Column1
2019	(Thru Feb only) 15 + 50 (see Confidential below) =	65
2018	255 + 50 (see Confidential below) =	305 Average of
2017		220
2016		137

Confidential wells = 100; split evenly between 2018 and 2019

lian Reservation

f 2016 thru 2018 = 221