

¹Supporting Statement A

Leasing of Osage Reservation lands for Oil and Gas Mining, 25 CFR 226

OMB Control Number 1076-0180

Terms of Clearance: The prior terms of clearance for this information collection requiring the implementation of electronic reporting for monthly royalty and production reports remain in effect. In accordance with 5 CFR 1320, the information collection is approved until January 2020 to allow DOI sufficient enough time to fulfill the previous terms of clearance through the promulgation of regulations. to either promulgate a new regulation that fulfills the previous terms of clearance or for DOI to fulfill the previous terms of clearance separate from a rule-making. The previous terms of clearance still stand, which are: The Bureau of Indian Affairs must enable the electronic reporting of monthly reports under 226.26 and 226.27(a) (which both now fall within 226.13(b)) within one year of the approval date of this information collection request.

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 ICR contain surveys, censuses, or employ statistical methods?" is checked "Yes," then a Supporting Statement B must be completed. 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.**

In 1906, Congress passed legislation allotting the Osage Reservation lands and reserving the

subsurface mineral estate to the Osage Nation. *See* 34 Stat. 539, 544-45, § 3, as amended (1906 Act). Accordingly, the United States holds the subsurface mineral estate in Osage County, Oklahoma (Osage Mineral Estate) in trust for the benefit of the Osage Nation. The 1906 Act authorizes the Osage Nation to lease the subsurface mineral estate for oil and gas mining, subject to the approval of the Secretary of the Interior and under such rules and regulations as he/she may provide. The regulations set forth in 25 CFR 226, implement that statute by specifying what information lessees and others must provide regarding oil and gas leasing, drilling, development, and production within the Osage Mineral Estate. The information collections in 25 CFR 226 are necessary in order for the Bureau of Indian Affairs (BIA) to administer the leasing and development of the Osage Mineral Estate as well as to ensure that all royalties and revenues derived from the Osage Mineral Estate are collected and accounted for and that the oil and gas trust assets, surface estate, natural resources, and human environment are adequately protected.

BIA is seeking to renew the information collections for 25 CFR 226. Due to the age of the regulations, they do not require, authorize, or otherwise contemplate the use of electronic reporting. The BIA is presently working to revise the regulations. As part of this rulemaking effort, the BIA intends to incorporate provisions that allow for the implementation of electronic reporting in Osage County utilizing the Department of the Interior's Office of Natural Resources Revenue (ONRR) e-Commerce site. Please see a more detailed explanation of these plans under Question 3.

It should be noted that regulatory provisions cited in the previous terms of clearance, §§ 226.26 and 226.27(a), are from the 2015 Final Rule revising 25 CFR part 226 (80 FR 26994) and relate to the filing of royalty reports. The 2015 Final Rule was withdrawn as the result of litigation and never went into effect. The version of 25 CFR part 226 in effect prior to publication of the 2015 Final Rule remains in effect. In the current regulations, §§ 226.13 and 226.14(a) govern royalty reporting.

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.

BIA uses the information it collects to determine whether or not a lease may be approved or has terminated; whether or not a drilling, workover, or plugging permit may be approved; how much oil or gas is being produced and sold under a lease; the amount of royalties owed; and whether wells have been drilled and completed, are in production, or have been plugged and abandoned.

Section(s)	Information Collected	Reason for Collection	Form(s)
226.2(b) and 226.2(f) [formerly approved as 226.5]	Bidder or Osage Tribal Council submits completed lease form	To identify lessee and obtain commitments to lease.	Form A – Mining Lease Form B – Oil Lease Form C – Oil & Gas Lease

226.6(a)-(c) [formerly approved as 226.9]	Lessee must submit bonds.	To ensure resources to address contingencies and well shut down in protection of trust resource.	Form D – Mining Lease Bond Form G – Collective Bond Form H – Assignment Bond Form
226.14(b) [formerly approved as 226.27(b)]	Purchaser submits monthly statement	To determine the amount of royalty payments.	--
226.15(a) [formerly approved as 226.28]	Lessee submits unit or cooperative agreement and termination of any such agreement	To identify and monitor lease operations.	--
226.16(b) and 226.29(c) [formerly approved as 226.34(b) and 226.52]	Lessee must submit applications on BIA forms for well drilling, treating, or workover operations, removing casing from well.	To identify and monitor lease operations.	Form 139 – Permit to Drill or Reenter;
226.20(d) [formerly approved as 226.40 and 226.41]	Person claiming interest in surface damages submits statement of interest	To determine who is entitled to payment or damages.	--
226.23 [Easement Form formerly approved as 226.47]	Lessee submits commercial or non-commercial easement	To identify and monitor lease operations.	Easement Form
226.30 [formerly approved as 226.54]	Lessee maintains full and correct account of operations, receipts, and disbursements	To ensure appropriate royalties to owners are paid.	--
226.32(a) [formerly approved as 226.56]	Lessee keeps accurate and complete well records	To identify and monitor lease operations and protection of trust asset.	--
226.32(b) [formerly approved as 226.56]	Lessee submits reports of tests and surveys	To identify and monitor lease operations and protection of trust asset.	--

Section(s)	Information Collected	Reason for Collection	Form(s)
226.7 [formerly approved as 226.5]	Lessee submits request for lease modification	To identify and monitor lease operations.	NEW FORM Modification of Oil/Gas Mining Lease

226.8(a) and 226.8(b) [formerly approved as 226.13]	Corporate lessee submits corporate information	To ensure authority to enter into lease on behalf of the corporate entity and ensure existence of corporate entity.	Form E – Officer to Execute Papers NEW FORM List of Corporate Officers Form
226.13(b) [formerly approved as 226.26 and 226.27(a)]	Lessee submits monthly royalty report	To ensure appropriate royalties to owners are paid.	Form 101; Form 101-A; Form 133; Form 157; Form 300, NEW FORM Tank Bottom Oil Report Form
226.15(b) and 226.7 [formerly approved as 226.29]	Lessee submits assignment or transfer of lease	To identify assignee who will be responsible for complying with lease.	Form F – Assignment of Lease NEW FORM Assignment of Liability Form
226.29(d) and 226.32(c) [formerly approved as 226.34(b), 226.52, and 226.56]	Lessee submits well completion report, well logs, reports on the completion of workover and plugging operations; and any other reports or records of operations	To identify and monitor lease operations.	Form 208 Form 139 NEW FORM Waterflood Operating Report Form 229
226.32(e) [formerly approved as 226.56]	Lessee submits plat showing well location, status, and designation	To identify and monitor lease operations and protection of trust asset.	NEW FORM Lease Status Report Form
226.41 [formerly approved as 226.66]	Lessee submits reports of all accidents, fires, or acts of theft and vandalism	To identify and monitor lease operations and protection of trust asset.	NEW FORM Spill Reporting and Remediation Form

Section(s)	Information Collected	Reason for Collection	Form(s)
226.2(a)	Individual submits application to nominate tract(s) to be offered for lease	To identify tracks of land available to offer for lease at a scheduled lease sale.	--
226.2(c)	Lessee submits information needed for environmental assessment	To comply with the requirements of the National Environmental Policy Act of 1969 (NEPA) by evaluating the potential impacts resulting from the proposed action. .	Environmental Assessment Questionnaire
226.3	Lessee submits application to surrender or cancel all or any	To identify and monitor lease operations.	--

	portion of lease		
226.14(a)	Lessee submits division order or contract	To identify and monitor lease operations.	--
226.15(c) and 226.15(d)	Lessee submits agreement creating overriding royalties or drilling contract	To identify and monitor lease operations.	--
226.21(g)	Lessee submits report on settlement agreement for surface damages	To document the damages incurred by the surface owner, identify the location and nature of the damages, and record the amount of the settlement.	--
226.22(b) and 226.22(d)	Lessee submits request for variance from pit construction requirements	To identify and monitor lease operations.	--
226.24	Lessee submits request to use water from streams and natural water courses	To identify and monitor lease operations.	--
226.27(a)	Oil lessee submits report of connections to gas lessee's well	To identify and monitor lease operations.	--
226.27(b)(3)	Lessee submits application for termination of agreement to furnish gas to Osage Tribe or Osage Tribe Member	To identify and monitor lease operations and protect the Osage Nation and Osage Tribal Members.	--
226.28	Lessee submits application for approval to shut down, abandon, or otherwise discontinue the operation of a well	To identify and monitor lease operations.	--
226.29(a)	Lessee submits agreement with surface owner for disposition of permanent improvements	To ensure that rights of surface owners are protected. To identify and monitor lease operations.	--
226.33	Lessee submits request for variance from line drilling limitations	To identify and monitor lease operations.	--
226.38	Lessee submits tank table and meter tests; lessee requests variance from oil storage requirements	To identify and monitor lease operations and ensure the proper storage and measurement of oil and gas.	--
226.39	Lessee submits request for variance from gas measurement requirements	To identify and monitor lease operations and ensure the proper measurement of gas.	--
226.40	Lessee requests approval to use gas for lifting oil	To identify and monitor lease operations.	--
226.45	Lessee or operator must submit application for trucking permit	To document the trucking companies operating in Osage County and ensure safe operations.	Osage Mineral Reserve Trucking Permit

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.

The regulations in 25 CFR part 226 contemplate the submission of information by U.S. mail and hand-delivery. The last substantive revisions to the regulations in 25 CFR part 226 occurred in 1974. Accordingly, the information collection techniques in the regulations reflect the technology and industry standards at that time. The Osage Agency does allow respondents to submit certain information electronically via e-mail. In practice, however, many transactions occur in-person at the Osage Agency, resulting in respondents submitting information in hard copy.

The regulations currently set forth specific royalty and production reporting requirements that lessees, operators, and purchasers must comply with. Due to the age of the regulations, however, they do not require, authorize, or otherwise contemplate the use of electronic reporting. The proper way for the BIA to change regulatory requirements is through the agency rulemaking process with notice and public comment. The BIA initiated this process and is presently working to revise the regulations. As part of this rulemaking effort, the BIA intends to incorporate provisions that allow for the implementation of electronic reporting in Osage County utilizing ONRR's e-Commerce site.

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.

There is no duplication of effort regarding collection of this information because only the BIA has statutory responsibility for approving and administering oil and gas leases of the Osage Mineral Estate. Further, most of the information would be created and maintained by respondents in the normal course of business even in the absence of the regulatory requirements.

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

Osage Agency employees minimize the burden of the collection by assisting lessees with the forms and requirements. BIA also lessened the burden on small entities by requiring the submission of information that such entities would have in their possession even in the absence of a Federal requirement because it is collected by State, local, or tribal governments and/or is created and maintained in the normal course of business.

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 this information is not collected, oil and gas leasing of the Osage Mineral Estate will be unregulated and the BIA will be unable to properly carry out its trust responsibility to the Osage Nation. The information collection requirement involves the minimum information necessary to protect trust assets and ensure that trust beneficiaries receive royalties due them.

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

- * **requiring respondents to report information to the agency more often than quarterly;**
- * **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- * **requiring respondents to submit more than an original and two copies of any document;**
- * **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- * **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;**
- * **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- * **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**
- * **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.**

There is a special circumstance that would cause an information collection to be conducted in any manner listed above. Lessees are required to provide royalty and production reports on a monthly basis to ensure that the correct royalties are collected and that the Osage Nation receives all royalties due and owing.

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 three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

A 60-day notice for public comments was published in the Federal Register on October 31, 2019 (84 FR 58409). No comments were received.

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 three 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.

The Agency reached out to several entities familiar with the information required under the

regulations. They received the following feedback from two sources:

Lessee No. 1 stated that his family has been producing oil and gas in Osage County since 1981 and they have drilled more than 400 wells. He is very familiar with the current regulations governing the Osage Minerals Estate. He does not have any issue with the various forms that are required such as Form 139, Completion Form 208, Lessee Reports, and Lease Status Reports. He said that these forms have been the same for quite some time.

Lessee No. 2 stated that his family has been producing oil and gas in Osage County since 1960 and they have drilled more than 200 wells. He stated that they are familiar with the required forms to be submitted to the agency and do not have any issue. He did mention that the requirement for the Lease Status Report every 6 months is unnecessary since generally nothing changes.

Lessee No. 3 stated that his family has been producing oil and gas in Osage County since 1977 and they have drilled more than 100 wells. He said that the required forms 139, 208, and lessee reports are not a burden and would like to see these forms submitted electronically in the future.

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

No payments or gifts are provided to respondents.

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

This is not applicable.

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.

There are no questions of a sensitive nature included in the information collected.

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

- * **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.**

- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- * 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 total burden hours for the collection are 22,731 hours with \$841,726 in burden hour cost per year. These annual burden hours are broken down as follows:

Section(s)	Information Collected	Respondents	Annual Responses	Hourly burden per response	Total Annual Hourly Burden	Salary Burden *
226.2(a)	Individual submits application to nominate tract(s) to be offered for lease	5	38	1	38	\$1,407
226.2(b) and 226.2(f)	Bidder or Osage Tribal Council submits completed lease form	13	69	3	207	\$7,665
226.2(c)	Lessee submits information needed for environmental assessment	5	9	24	216	\$7,998
226.3	Lessee submits application to surrender or cancel all or any portion of lease	1	43	3	129	\$4,777
226.6(a)-(c)	Lessee must submit bonds.	77	279	1	279	\$10,331
226.7	Lessee submits request for lease modification	1	1	1	1	\$37
226.8(a) and 226.8(b)	Corporate lessee submits corporate information	77	279	1	279	\$10,331
226.13(b)	Lessee submits monthly royalty report	314	24,660	5 Min	2,055	76,097
226.14(a)	Lessee submits division order or contract	71	270	1	270	9,998

226.14(b)	Purchaser submits monthly statement	16	20,172	15 Min	5,043	186,742
226.15(a)	Lessee submits unit or cooperative agreement and termination of any such agreement	1	1	1	1	\$37
226.15(b) and 226.7	Lessee submits assignment or transfer of lease	64	210	5	1,050	\$38,882
226.15(c) and 226.15(d)	Lessee submits agreement creating overriding royalties or drilling contract	1	1	1	1	\$37
226.16(b) and 226.29(c)	Lessee must submit applications on BIA forms for well drilling, treating, or workover operations, removing casing from well.	58	253	9	2,277	\$84,317
226.20(d)	Person claiming interest in surface damages submits statement of interest. Agency reviews and files.	12	12	30 Min	6	\$222
226.21(g)	Lessee submits report on settlement agreement for surface damages	20	20	5	100	\$3,703
226.22(b) and 226.22(d)	Lessee submits request for variance from pit construction requirements	2	2	1	2	\$74
226.23	Lessee submits commercial or non-commercial easement	4	4	3	12	\$444
226.24	Lessee submits request to use water from streams and natural water courses	4	4	2	8	\$296
226.27(a)	Oil lessee submits report of connections to gas lessee's well	36	36	1	36	\$1,333

226.27(b)(3)	Lessee submits application for termination of agreement to furnish gas to Osage Tribe or Osage Tribe Member	4	4	2	8	\$296
226.28	Lessee submits application for approval to shut down, abandon, or otherwise discontinue the operation of a well	4	4	2	8	\$296
226.29(a)	Lessee submits agreement with surface owner for disposition of permanent improvements	2	2	1	2	\$74
226.29(d) and 226.32(c)	Lessee submits well completion report, well logs, reports on the completion of workover and plugging operations; and any other reports or records of operations	58	205	1.5	308	\$11,405
226.30	Lessee maintains full and correct account of operations, receipts, and disbursements	--	--	--	--	--
226.32(a)	Lessee keeps accurate and complete well records	--	--	--	--	--
226.32(b)	Lessee submits reports of tests and surveys	5	5	1	5	\$185
226.32(e)	Lessee submits plat showing well location, status, and designation	72	1,346	3	4,038	\$149,527
226.33	Lessee submits request for variance from line drilling limitations	3	12	1.5	18	\$667

226.38	Lessee submits tank table and meter tests; lessee requests variance from oil storage requirements	12	210	3	630	\$23,329
226.39	Lessee submits request for variance from gas measurement requirements	4	4	1	4	\$148
226.40	Lessee requests approval to use gas for lifting oil	2	2	2	4	\$148
226.41	Lessee submits reports of all accidents, fires, or acts of theft and vandalism	51	182	28	5,096	\$188,705
226.45	Lessee or operator must submit application for trucking permit	2	200	3	600	\$22,218
TOTALS	--	1,001	48,539	--	22,731	\$841,726

* To obtain the hourly rate, the BIA used \$37.03, the wages and salaries figure for civilian workers from BLS Release USDL-19-2195, Employer Costs for Employee Compensation—September 2019, Table 2, Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, at <https://www.bls.gov/news.release/pdf/ecec.pdf>. This wage includes a 1.5 multiplier for benefits.

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.)

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) 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.
- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens 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.

- * 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.**

The recordkeeping requirements in 226.30 and 226.32(a) are similar to those of the state of Oklahoma and generally include information that a business would create and maintain in the normal course of business. There are filing fees associated with leases, lease assignments, saltwater disposal easements. There is also a processing fee for plugging permits. The total estimated filing fees the BIA collects per year is \$4,535.

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 Osage Agency currently has staff, at GS levels 4, 9, and 13 devoted to processing the information collections and administering the oil and gas program. These three levels of staff split their time roughly equally among them. BIA averaged the employee salaries out to a GS-10/Step 1 (\$44.67), with a total cost of \$774,309 to the federal government. The federal government employee salary information was obtained from https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/RUS_h.aspx, with a 1.6 benefits multiplier.

The estimated total annual number of responses reviewed by the federal government, the estimated total annual hour burden, and total salary cost to the federal government are shown in the table below.

Section(s))	Federal Government Task	Annual Number of Responses	Federal burden per response	Total Federal burden hours	Salary Burden
226.2(a)	Review letter for nomination specifics, check tract availability, process nomination fee	38	1	38	\$1,697
226.2(b) and 226.2(f)	See attached checklist	69	3	207	\$9,247

226.2(c)	Verify lease, review and verify Application along with fees are filed with Superintendent and process and approve new lease	9	3	27	\$1,206
226.3	Verify lease belongs to requestor, request lease inspection from field operations, terminate upon receipt of lease inspection	43	3	129	\$5,762
226.6(a)-(c)	Verify that bond reflects correct leasing information, approve with new lease or assignment packet	279	1	279	\$12,463
226.8(a) and 226.8(b)	See attached list	279	1	279	\$12,463
226.13(b)	Production Data Encoding	24,660	5 Min	2,055	\$91,797
226.14(a)	Verify division order has correct lease information (legal, owner, ownership percentage, effective date)	270	1	270	\$12,061
226.14(b)	Reconciliation	20,172	15 Min	5,043	\$225,271
226.15(a)	Review unit or cooperative agreement and termination of any such agreement.	1	1	1	\$45
226.15(b) and 226.7	See attached checklist	210	5	1,050	\$46,904

226.16(b) and 226.29(c)	Review of incoming form 139s and 208s. Entry and maintenance of the permit into the tracking system. Preparation of all approval or denial paperwork. Filing as necessary. Site visit if needed.	253	4	1,012	\$45,206
226.21(g)	Perform onsite inspection of restricted and trust property for surface damages due to oil field operations. Document findings, measurements and take pictures submit to office. Office prepares damage notice letter, confirmation letters and collection letters.	20	5	100	\$4,467
226.22(b) and 226.22(d)	Request letter to build pits to be used for drilling, completion, recompletion or workover. Request review and approval or denial letter prepared	2	4	8	\$357
226.23	See attached checklist	4	3	12	\$536

226.24	Request letter to utilize water from streams and natural water courses. Inspect water source to determine if usage will diminish the supply and interfere with surface owner operations. Prepare approval or denial letter	4	3	12	\$536
226.27(a)	Request letter submitted to Superintendent to utilize gas for lease operating purposes. Prepare approval letter.	36	2	72	\$3,216
226.27(b) (3)	Request letter to Superintendent to utilize gas for the Osage Tribe. Review lease to determine if sufficient quantities of gas is available. Prepare approval or denial letter.	4	2	8	\$357
226.28	Request letter to abandon well due to non-productive. Review of well production history. Prepare approval or denial letter.	4	2	8	\$357
226.29(a)	Lessee submits agreement with surface owner for disposition of permanent improvements. Agency reviews and files.	2	30 Min	1	\$45

226.29(d) and 226.32(c)	Agency reviews well completion report, well logs, reports on the completion of workover and plugging operations; and any other reports or records of operations	58	1.5	87	\$3,886
226.32(b)	Agency request to Lessee to submit reports of tests and surveys	5	2	10	\$447
226.32(e)	Agency request Lessee submit plat showing well location, status, and designation	72	4	288	\$12,865
226.38	Witness tank strapping in field, verify tank volume, number tank, witness oil lact unit testing and gas meter testing and inspection, approval of variance from manual gauging to automation gauging due to H2S.	210	3	630	\$28,142
226.39	Lessee submits request for variance from gas measurement requirements	4	2	8	\$357
226.40	Lessee requests approval to use gas for lifting oil	2	2	4	\$179
226.41	Lessee submits reports of all accidents, fires, or acts of theft and vandalism	182	28	5,096	\$227,638

226.45	Verify Company and truck is operating Osage County, process request, prepare permit and mail permit and approval letter to Company	200	3	600	\$26,802
TOTAL	--	47,110	--	17,334	\$774,309

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

No changes were made to this information collection.

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.

There are no plans to publish the results of this collection of information. However, a summary may be used for budget justification.

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.

The BIA intends to display the expiration date with the OMB Control Number.

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

There are no exceptions.