

Supporting Statement A

Oil and Gas Facility Site Security (43 CFR Subparts 3170 and 3173)

OMB Control Number 1004-0207

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 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.

Information collection activities under OMB Control Number 1010-0207 pertain to information about Federal and Indian (except Osage Tribe) onshore oil and gas leases. The information facilitates accurate measurement of oil and gas, production accountability, payment of royalties that are due, and prevention of theft and loss.

The following statutes authorize the information collection under control number 1004-0207:

- Allotted Mineral Leasing Act, 25 U.S.C. 396;
- Indian Mineral Leasing Act, 25 U.S.C. 396a et seq.;
- Indian Mineral Development Act, 25 U.S.C. 2101 et seq.;
- Mineral Leasing Act, 30 U.S.C. 181 et seq.;
- Mineral Leasing Act for Acquired Lands, 30 U.S.C. 351 et seq.;
- Federal Oil and Gas Royalty Management Act, 30 U.S.C. 1701 et seq.; and
- Federal Land Policy and Management Act, 43 U.S.C. 1701 et seq.

On November 17, 2016, the BLM published in the *Federal Register* the three following final rules: (1) “Onshore Oil and Gas Operations; Federal and Indian Oil and Gas Leases; Site Security” (81 FR 81365), codified at 43 CFR 3170 and 3173; (2) “Onshore Oil and Gas Operations; Federal and Indian Oil and Gas Leases; Measurement of Oil” (81 FR 81462),

codified at 43 CFR 3174; and (3) “Onshore Oil and Gas Operations; Federal and Indian Oil and Gas Leases; Measurement of Gas” (81 FR 81516), codified at 43 CFR 3175.

The 2016 Final Rules were prompted by external and internal oversight reviews, which found that many of the BLM’s production measurement and accountability policies were outdated and inconsistently applied. The rules also provided a process for approving new measurement technologies that meet defined performance standards. The rules became effective on January 17, 2017.

Since the issuance of the 2016 Final Rules, representatives of the oil and gas industry and other interested stakeholders have raised a number of issues and concerns related to the implementation of the new regulations. The BLM agrees that there have been challenges with implementing some of the provisions of the 2016 Final Rules and has attempted to address some of them through administrative policy directives.¹ However, the BLM only can address other provisions by revising the 2016 Final Rules through a rulemaking action.

Due to Executive Order 13783, “Promoting Energy Independence and Economic Growth” (82 FR 16093) and Secretary Order No. 3349, “American Energy Independence,” the BLM reviewed the 2016 Final Rules for opportunities to address implementation challenges and to determine if certain provisions may impose regulatory burdens that unnecessarily encumber energy production, constrain economic growth, and prevent job creation. As a result of this review, the BLM is now proposing to modify certain provisions of 43 CFR subparts 3170, 3173, 3174, and 3175 to reduce unnecessary and burdensome regulatory requirements

In connection with a proposed rule, the Bureau of Land Management (BLM) seeks to revise the control number (1004-0207) pertaining to site security for Federal and Indian (except Osage Tribe) oil and gas leases. The proposed rule (RIN 1004-AE59) would revise 43 CFR subparts 3170 and 3173 and affect control number 1004-0207, as well as the following control numbers:

- Onshore Oil and Gas Operations and Production (1004-0137);
- Measurement of Oil (1004-0209); and
- Measurement of Gas (1004-0210).

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 proposed rule would remove or revise requirements that the BLM has found to be unnecessarily burdensome, unclear, inconsistent, or otherwise problematic. The proposed rule would also adopt updated industry standards, where appropriate, and provide for the use of

¹ These administrative policy directives were contained in three Instruction Memoranda (IMs): IM No. 2017-032 (Jan. 17, 2017), IM No. 2018-069 (June 29, 2018), and IM No. 2018-077 (June 29, 2018). All three of these IMs are available on the BLM’s website at <https://www.blm.gov/policy/instruction-memorandum>.

emerging measurement technologies. The following is an explanation of how the proposed regulatory changes would affect the various subpart's collections of information:

Proposed § 3170.50, Required Recordkeeping, Records Retention, and Records Submission

Existing section 3170.7 applies to lessees, operators, purchasers, transporters, and any other person directly involved in producing, transporting, purchasing, selling, or measuring oil or gas through the point of royalty measurement or the point of first sale, whichever is later. This regulation applies to records generated during or for the period for which the lessee or operator has an interest in or conducted operations on the lease, or in which a person is involved in transporting, purchasing, or selling production from the lease. This information collection activity assists the BLM in accurate accounting of oil and gas production.

In general, records from Federal leases must be maintained for seven years, and records from Indian leases must be maintained for six years. Additional details and exceptions are explained below.

For Federal leases, and units or communitized areas that include Federal leases but do not include Indian leases, the record holder must maintain records for seven years after the records are generated. If a judicial proceeding or demand involving such records is timely commenced, the record holder must maintain such records until the final nonappealable decision in such judicial proceeding is made, or with respect to that demand is rendered, unless the Secretary, her designee, or the applicable delegated State authorizes an earlier release of the requirement to maintain such records in writing.

For Indian leases, and units or communitized areas that include Indian leases but do not include Federal leases, the record holder must maintain records for six years after the records are generated. If the Secretary or her designee notifies the record holder that the Department of the Interior has initiated or is participating in an audit or investigation involving such records, the record holder must maintain such records until the Secretary or his designee releases the record holder from the obligation to maintain the records.

For units and communitized areas that include both Federal and Indian leases, if the Secretary or his designee has notified the record holder within six years after the records are generated that an audit or investigation involving such records has been initiated, but a judicial proceeding or demand is not commenced within seven years after the records are generated, the record holder must retain all records regarding production from the unit or communitized area until the Secretary or her designee releases the record holder from the obligation to maintain the records. If a judicial proceeding or demand is commenced within seven years after the records are generated, the record holder must retain all records regarding production from the unit or communitized area until the final nonappealable decision in such judicial proceeding is made, or with respect to that demand is rendered, unless the Secretary or her designee authorizes in writing a release of the requirement to maintain such records before a final nonappealable decision is made or rendered.

For all types of Federal and Indian leases, the lessee, operator, purchaser, and transporter must maintain an audit trail that includes all records, including source records that are used to

determine quality, quantity, disposition, and verification of production attributable to a Federal or Indian lease, unit participating area (unit PA), or CA, must include the FMP number or the lease, unit PA, or CA number along with a unique equipment identifier (e.g., a unique tank identification number and meter station number); and the name of the company that created the record. For existing measurement facilities, in the interim period before the assignment of an FMP number, all records must include the following information:

- The name of the operator;
- The lease, unit PA, or CA number; and
- The well or facility name and number.

This section requires operators, purchasers, and transporters to submit all records, including source records that are relevant to determining the quality, quantity, disposition, and verification of production attributable to Federal or Indian leases, upon request, in accordance with a regulation, written order, Onshore Order, NTL, or COA.

Proposed § 3170.50(g) would revise the IC activity previously approved for § 3170.7(g) by adding “land description” to the list of information that must be included in records that are used to determine quality, quantity, disposition, and verification of production.

The remaining provisions of § 3170.50 are the same as in existing § 3170.7. Like existing § 3170.17, proposed § 3170.50 would apply to lessees, operators, purchasers, transporters, and any other person directly involved in producing, transporting, purchasing, selling, or measuring oil or gas through the point of royalty measurement or the point of first sale, whichever is later. Proposed section 3170.50 also would apply to records generated during or for the period for which the lessee or operator has an interest in or conducted operations on the lease, or in which a person is involved in transporting, purchasing, or selling production from the lease. Like existing §3170.7, proposed §3170.50 would assist the BLM in accurate accounting of oil and gas production. This proposed revision would not affect the estimated burdens of control number 1004-0207.

Proposed § 3173.31, Water-Draining Operations — Gauging

Existing section 3173.6 requires submission of information when water is drained from a production storage tank. The information is required from the operator, purchaser, or transporter, as appropriate. Previously, the operator was not required to record the volume of hydrocarbons that are in the tank before and after water is drained. As a result, hydrocarbons could be drained with the water and removed without proper measurement and accounting, and without royalties being paid. These information collection activities assist the BLM in accurate accounting of oil and gas produced from Federal and Indian leases.

The following information is required:

- Federal or Indian lease, unit PA, or CA number(s);
- The tank location by land description;
- The unique tank number and nominal capacity;
- Date for opening gauge;

- Opening gauge of the total oil volume and free-water measurements;
- Unique identifying number of each seal removed;
- Closing gauge of the total oil volume measurement; and
- Unique identifying number of each seal installed.

Proposed § 3173.31 would revise and replace two IC activities previously approved for § 3173.6 (“Water Draining Operations —Data Collection” and “Water Draining Operations — Recordkeeping and Records Submission”). The proposed regulation would remove the list of information specified for water draining operations, and instead refer to the IC requirements in existing § 3173.41(b) (“Required Recordkeeping for Inventory and Seal Records”). Like the existing water-draining provisions, the proposed provision would assist the BLM in accurate accounting of oil and gas produced from Federal and Indian leases.

This proposed revision would constitute a program change to control number 1004-0207 that would affect the estimated burdens as follows: The estimated responses for the two water-draining IC activities in existing control number 1004-0207 total 65,000 annually (60,000 for “Water Draining Operation —Recordkeeping and Records Submission” and 5,000 for “Water Draining Operation —Data Collection”). The estimated hour burden for these IC activities totals 25,000 hours annually (15,000 for Water Draining Operation —Recordkeeping and Records Submission” and 10,000 for “Water Draining Operation —Data Collection”). In comparison, the estimated burdens of the single water-draining operation IC activity in the proposed rule would be 60,000 responses (-5,000 responses) and 15,000 hours annually (-10,000 annual burden hours).

Proposed § 3173.41, Required Recordkeeping for Inventory and Seal Records

Existing section 3173.9 requires operators to measure and record within +/- 3 days of the final day of each calendar month an inventory consisting of TOV in storage (less free water). If the inventory is not taken on the final day of each month, it must be estimated based on two measurements no less than 20 days and no more than 31 days apart, based upon the prorated difference between these inventory levels and any sales that have occurred between the two measurements. This information collection activity assists the BLM in accurate accounting of oil and gas production.

For each seal, the operator must maintain a record that includes the unique identifying number of each seal and the valve or meter component on which the seal is or was used; the date of installation or removal of each seal; for valves, the position (open or closed) in which it was sealed; and the reason the seal was removed.

Proposed § 3173.41 would be the new CFR cite for existing 43 CFR 3173.9. Like existing § 3173.9, proposed § 3173.41 would require operators to measure and record an inventory consisting of Total Observed Volume (TOV) in storage (less free water). This submission is due within three days before or after the last day of the calendar month under both the existing and proposed regulation. This proposed revision would not affect the estimated burdens of control number 1004-0207.

Proposed § 3173.32, Hot Oiling, Clean-Up, and Completion Operations

Existing section 3173.7 requires the submission of information during hot oil, clean-up, or completion operations, or any other situation where the operator removes oil from storage, temporarily uses it for operational purposes, and then returns it to storage on the same lease, unit PA, or CA. This information collection activity assists the BLM in accurate accounting of oil and gas produced from Federal and Indian leases.

The following information is required:

- Federal or Indian lease, unit PA, or communitization agreement number(s);
- The tank location by land description;
- The unique tank number and nominal capacity;
- Date of the opening gauge;
- Opening gauge measurement;
- Closing gauge measurement;
- Unique identifying number of each seal installed;
- How the oil was used; and
- Where the oil was used (i.e., well or facility name and number).

Proposed § 3173.32 would revise existing 43 CFR 3173.7 only with respect to the CFR cite. Proposed § 3173.32 would require the submission of information during hot oil, clean-up, or completion operations, or any other situation where the operator removes oil from storage, temporarily uses it for operational purposes, and then returns it to storage on the same lease, unit PA, or CA. Like existing § 3173.7, proposed § 3173.32 would assist the BLM in accurate accounting of oil and gas produced from Federal and Indian leases. This proposed revision would not affect the estimated burdens of control number 1004-0207.

Proposed § 3173.40, Report of Theft or Mishandling of Production

Existing section 3173.8 requires operators, transporters, or purchasers to submit a report (either oral or written) no later than the next business day after discovery of an incident of apparent theft or mishandling of production. All oral reports must be followed up with a written incident report within 10 business days of the oral report. By applying not only to operators but also to transporters and purchasers (who often are the first ones to discover theft and mishandling or to recognize suspicious activity), this information collection activity assists in prompt disclosure of theft or mishandling. The incident report must include the following information:

- Company name and name of the person reporting the incident;
- Lease, unit PA, or CA number, well or facility name and number, and FMP number, as appropriate;
- Land description of the facility location where the incident occurred;
- The estimated volume of production removed;
- The manner in which access was obtained to the production or how the mishandling occurred;
- The name of the person who discovered the incident;
- The date and time of the discovery of the incident; and

- Whether the incident was reported to local law enforcement agencies and company security

Proposed § 3173.40 would replace existing § 3173.8. The proposed regulation would revise the existing regulation only with respect to its CFR cite. Like § 3173.8, proposed § 3173.40 would require operators, transporters, and purchasers to submit a report (either oral or written) no later than the next business day after discovering an incident of apparent theft or mishandling of production. All oral reports would be required to be followed up with a written incident report within 10 business days of the oral report. By applying not only to operators but also to transporters and purchasers (who often are the first ones to discover theft and mishandling or to recognize suspicious activity), this IC activity assists in prompt disclosure of theft or mishandling. This proposed revision would not affect the estimated burdens of control number 1004-0207. However, BLM is making a program change to the number of responses and burden hours. The approved estimated responses currently total 5 annually. The approved estimated hour burden totals 50 hours annually. In comparison, the estimated burdens of IC activity in the proposed rule would be 50 responses (+45 responses) and 150 hours annually (+100 annual burden hours).

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.

We anticipate the most respondents will choose to comply with the information collection requirements electronically, even where regulations do not require them to do so.

Control number 1004-0207 has no forms. However, respondents may scan any written submissions that they wish to submit to the BLM and email them to the appropriate BLM office.

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.

No duplication of information occurs on the information collection activities in the proposed rule. The requested information is unique to each respondent and is not available from any other data source.

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

Nearly all the respondents that would be subject to the proposed rule are small businesses or other small entities. The BLM has developed the proposed rule with the objective of seeking the minimum amount of information consistent with the goals of the rulemaking. The information

collection requirements for small businesses and other small entities are the same as for other respondents.

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, or collected it less frequently, oil and gas leasing activities and operations could not occur on Federal or Indian leases in compliance with pertinent statutes and policies.

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.**

In general, 43 CFR § 3170.50, Required Recordkeeping, Records Retention, and Records Submission, requires that records from Federal leases must be maintained for seven (7) years, and records from Indian leases must be maintained for six (6) years. The necessity of these record retention requirements is outlined in detail in Item 2, above. These record retention requirements are necessary for audits or investigations, or in the event of judicial proceedings. Otherwise, there are no other special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5(d).

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.

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.

As required in 5 CFR 1320.11, BLM is providing for and has described the 60-day review and comment process in the preamble of the proposed rule. We will address the comments received on the information collection in the final rule.

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

We would not provide payments or gifts to the respondents.

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

The proposed rule would provide no assurance of confidentiality to respondents.

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.

We would not require respondents to answer questions of a sensitive nature.

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.

Under the proposed rule, the BLM estimates the following annual burdens for respondents:

1. 89,045 responses;
2. 59,740 hours; and
3. \$4,056,944 in dollar equivalents.

Hour and cost burdens to respondents include time spent for researching, preparing, and submitting information.

Table 12-1 shows how the BLM has calculated the estimated weighted average hourly wage for industry of \$67.91. The BLM determined the mean hourly wages for that calculation by using national Bureau of Labor Statistics data at https://www.bls.gov/oes/current/oes_nat.htm. The benefits multiplier of 1.4 is supported by information at <http://www.bls.gov/news.release/ecec.nr0.htm>.

**Table 12-1
Estimated Weighted Average Hourly Costs for Industry**

A. Position	B. Mean Hourly Pay Rate	C. Hourly Rate with Benefits (Column B x 1.4)	D. Percent of Collection Time	E. Weighted Average Hourly Cost (Column C x Column D)
General Office Clerk (43-9061)	\$17.48	\$24.47	10%	\$2.45
Engineer (17-2199)	\$49.26	\$68.96	80%	\$55.17
Engineering Manager (11-9041)	\$73.52	\$102.93	10%	\$10.29
Totals			100%	\$67.91

Table 12-2 itemizes the estimated hour burdens.

**Table 12-2
Estimates of Respondents' Hour and Cost Burdens**

A. Type of Response	B. Number of Responses	C. Hours per Response	D. Total Hours	E. Dollar Equivalent (Column D x \$67.91)
Required Recordkeeping and Records Submission 43 CFR 3170.50	4,300	5	21,500	\$1,460,065
Water-Draining Operations — 43 CFR 3173.31	60,000	0.25	15,000	\$1,018,650
Hot Oiling, Clean-Up, and Completion Operations — Data Collection 43 CFR 3173.32	4,670	2	9,340	\$634,279
Hot Oiling, Clean-Up, and Completion Operations — Recordkeeping and Records Submission 43 CFR 3173.32	15,000	0.25	3,750	\$254,663
Report of Theft or Mishandling of Production 43 CFR 3173.40	75	2	150	\$10,187
Required Recordkeeping for Inventory and Seal Records 43 CFR 3173.41	5,000	2	10,000	\$679,100
Totals	0	—	0	0

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.**

No filing fees or capital costs are associated with this control number.

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.

Under the proposed rule, the BLM estimates the following annual burdens for the government:

- 89,045 responses;
- 46,485 hours; and
- \$2,594,329 in dollar equivalents.

The estimated hourly cost to the Federal Government of \$54.26, shown below in Table 14-1, is based on data from the Office of Personnel and Management (OPM) at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/RUS_h.pdf.

The benefits multiplier of 1.6 is implied by information at <http://www.bls.gov/news.release/ecec.nr0.htm>.

**Table 14-1
Weighted Average Hourly Cost Calculation**

A. Position	B. Mean Hourly Pay Rate	C. Hourly Rate with Benefits (Column B x 1.6)	D. Percent of Collection Time	E. Weighted Average Hourly Cost (Column C x Column D)
General Office Clerk GS-6, step 5	\$21.14	\$33.82	10%	\$3.38
Professional GS-11, step 5	\$34.76	\$55.62	80%	\$44.50
Managerial GS-13, step 5	\$49.54	\$79.26	10%	\$7.93
Totals	—	—	100%	0

Table 14-2, below, shows the estimated Federal hours and costs for each component of this information collection.

**Table 14-2
Estimated Annual Cost to the Government**

A. Type of Response	B. Number of Responses	C. Time per Response	D. Total Hours (Column B x Column C)	E. Dollar Equivalent (Column D x \$55.81)
Required Recordkeeping and Records Submission 43 CFR 3170.50	4,300	3 hours	12,900	\$719,949
Water-Draining Operations — 43 CFR 3173.31	60,000	.25 hour	15,000	\$837,150
Hot Oiling, Clean-Up, and Completion Operations — Data Collection 43 CFR 3173.32	4,670	1 hour	4,760	\$265,656

A. Type of Response	B. Number of Responses	C. Time per Response	D. Total Hours (Column B x Column C)	E. Dollar Equivalent (Column D x \$55.81)
Hot Oiling, Clean-Up, and Completion Operations — Recordkeeping and Records Submission 43 CFR 3173.32	15,000	.25 hour	3,750	\$209,288
Report of Theft or Mishandling of Production 43 CFR 3173.40	75	1 hour	75	\$4,186
Required Recordkeeping for Inventory and Seal Records 43 CFR 3173.41	5,000	2 hours	10,000	\$558,100
Totals	0	—	0	0

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

The current OMB inventory includes 69,640 annual burden hours for the related collection of information. We expect the burden estimate for the proposed rule will be 89,045 responses and 59,740 hours, which reflects a decrease of 4,930 responses and 9,900 annual burden hours.

From approved annual burden hours under 1004-0207, the rule proposes changes to the following:

- Proposed section 3173.31 would revise and replace two IC activities previously approved for section 3173.6 (“Water Draining Operations —Data Collection” and “Water Draining Operations —Recordkeeping and Records Submission). The proposed rule would replace these two IC activities with a single IC activity, i.e., “Water-Draining Operations.” The estimated responses decrease by 5,000 (from 65,000 for the two existing IC activities to 60,000 for the one proposed activity). The estimated burden hours decrease by 10,000 (from 25,000 for the two existing IC activities to 15,000 for the one proposed).

- The proposed rule includes one program changes. From approved annual burden hours under 1004-0207, the rule proposes changes to the Report of Theft or Mishandling of Production (43 CFR 3173.40) (+100 annual burden hours). The estimated responses increase by 70 (from 5 for the existing IC activity to 75 for the proposed activity). The estimated burden hours increase by 100 (from 50 for the existing IC activity to 150 for the proposed activity).

There are no effects on estimated non-hour burdens.

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.

The BLM will not publish the results of this collection.

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 BLM is not seeking approval to not display the expiration date.

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

There are no exceptions to the certification statement.