

**Supporting Statement A**  
**Oil and Gas and Sulfur Operations in the Outer Continental Shelf—Revisions to the**  
**Requirements for Exploratory Drilling on the Arctic Outer Continental Shelf**  
**(Proposed Rule)**

**30 CFR 550, Subpart B – Plans and Information**  
**BOEM Forms 0137, 0138, 0139, 0141, 0142, and NTLs**

**OMB Control Number 1010-0151**  
**Current Expiration Date: June 30, 2021**

**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.

### **Introduction**

The Bureau of Ocean Energy Management (BOEM) in conjunction with the Bureau of Environment, Safety and Security (BSEE) prepared a notice of proposed rulemaking, entitled Oil and Gas and Sulfur Operations in the Outer Continental Shelf—Revisions to the Requirements for Exploratory Drilling on the Arctic Outer Continental Shelf. BOEM’s information collection activities related to this rulemaking for 30 CFR 550, Subpart B, have been approved under OMB control number 1010-0151 (expiration June 30, 2021). BOEM is submitting this information collection clearance package to request OMB’s approval for revision of information collections activities for OMB control number 1010-0151 once the final rule is published.

The purpose of the new rulemaking is to revise its existing regulations for exploratory drilling and related operations on the Arctic OCS, to reduce unnecessary burdens on stakeholders while ensuring that energy exploration on the Arctic OCS is safe and environmentally responsible.

On July 15, 2016, BSEE and BOEM issued a joint final rule entitled "Oil and Gas and Sulfur Operations on the Outer Continental Shelf—Requirements for Exploratory Drilling on the Arctic Outer Continental Shelf," also known as the “2016 Arctic Rule” (81 FR 46478, July 15, 2016). The 2016 Arctic Rule was developed in response to experiences gained from Shell’s 2012 and 2015 Arctic operations, and concerns expressed by environmental organizations and Alaska Natives. The 2016 Arctic Rule was focused on exploratory drilling operations conducted during the Arctic OCS open-water drilling season in the Beaufort Sea and Chukchi Sea Planning Areas.

In 2017, Executive and Secretarial Orders on regulatory review and reform directed BSEE and BOEM to review the 2016 Arctic Rule and determine whether the Rule should be suspended, revised, or rescinded. In response to the orders, BSEE and BOEM undertook a review of the 2016 Arctic

Exploratory Drilling Rule with a view toward the policy direction of encouraging energy exploration and production on the Arctic OCS and reducing unnecessary burdens while ensuring that any such activity is safe and environmentally responsible. Therefore, BSEE and BOEM have developed a new rulemaking to (a) reduce regulatory burdens; (b) create greater certainty regarding operator's future obligations; (c) address issues identified through tribal consultation; and (d) ensure that oil and gas operations are performed in a safe and environmentally responsible manner.

## **Specific Instructions**

### **A. 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, as amended (43 U.S.C. § 1331 *et seq.* and 43 U.S.C. §1801 *et seq.*), authorizes the Secretary of the Interior to prescribe rules and regulations to administer leasing of mineral resources on the OCS. Such rules and regulations apply to all operations conducted under a lease, right-of-use and easement, or unit. Sections 11 and 25 of the amended OCS Lands Act require the holders of OCS oil and gas or sulphur leases to submit Exploration Plans (EPs) and Development and Production Plans (DPPs), and Development Operations Coordination Documents (DOCDs) to the Secretary for approval prior to commencing these activities. BOEM is the agency charged with managing the leasing process.

Also, BOEM has a continuing affirmative duty to comply with the National Environmental Policy Act (NEPA), Endangered Species Act (ESA), and the Marine Mammal Protection Act (MMPA). This includes a substantive duty to carry out any agency action in a manner that is not likely to jeopardize protected species as well as a procedural duty to consult with the Fish and Wildlife Service (FWS) and National Oceanic and Atmospheric Administration Fisheries (NOAA Fisheries) before engaging in a discretionary action that may affect a protected species.

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. Several requests for approval required in Subpart B are subject to cost recovery, and BOEM regulations specify service fees for these requests.

These authorities and responsibilities are among those delegated to BOEM. The regulations at 30 CFR 550, Subpart B, concern plans and information that must be submitted to conduct activities on a lease, right-of-use and easement, or unit and are the subject of this collection. The collection also covers the related Notices to Lessees and Operators (NTLs) that BOEM issues to clarify, supplement, or provide additional guidance on some aspects of our regulations.

This notice of proposed rulemaking pertains to regulations specific to the Arctic region. In 2016, BOEM finalized regulations that address activities conducted on the Arctic OCS. The current regulations required operators to develop an Integrated Operations Plan (IOP) for each exploratory program on the Arctic OCS, as well as to submit additional planning information with their EPs.

BSEE and BOEM reviewed the 2016 Arctic Rule and proposed revisions in accordance with Executive and Secretarial Orders on regulatory review and reform. To align with the orders for the Arctic region, BOEM is proposing in the new rulemaking to address removal of IOP requirements. Currently, lessees

are requirement to develop an IOP that addresses all phases of the Arctic OCS exploration program, and to submit the IOP to BOEM at least 90 days in advance of filing an EP. This rulemaking would eliminate this requirement.

The proposed rule would add a requirement to 550.211(b) to describe operational safety procedures that the operator has developed specific to conditions relevant on the Arctic OCS in the EP.

**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.**

BOEM engineers, geologists, geophysicists, and environmental scientists and other Federal agencies (e.g., FWS, NOAA Fisheries) analyze and evaluate the information and data collected under Subpart B to ensure that planned operations are safe; will not adversely affect the marine, coastal, or human environment; and will conserve the resources of the OCS. We use the information to: (a) make an informed decision on whether to approve the proposed EPs, DPPs, DOCDs as submitted, or whether modifications are necessary without the analysis and evaluation of the required information. The affected States also review the information collected to determine consistency with approved Coastal Zone Management (CZM) plans and (b) report annually to NOAA Fisheries the effectiveness of mitigation, any adverse effects of the proposed action, and any incidental take, in accordance with 50 CFR 402.14(i)(3).

The following forms submitted to BOEM under Subpart B. This rulemaking does not revise the existing forms, but will update their expiration dates. The forms' purposes are as follows:

**BOEM-0137—Plan Information Form** is submitted to summarize plan information. BOEM uses the information to assist in data entry and review of submitted OCS plans.

The form asks for, in either fill in the blanks or check marks:

- general information relating to the company;
- description of proposed activities;
- tentative schedule of proposed activities;
- description(s) of drilling rig, production platform, lease term pipelines;
- proposed well structure location; and
- anchor locations for drilling rig or construction barge.

**BOEM-0138—GOM Air Emission Calculations for Exploration Plans**

**BOEM-0139—GOM Air Emission Calculations for Development & Production Plans (DPPs) and Development & Operations Coordination Documents (DOCDs)** are submitted to standardize the way potential air emissions are estimated and approved as part of the OCS plan. These forms are intended to be thorough but flexible to meet the needs of different lessees and operators. BOEM uses the data from these forms to determine the effect of air emissions on the environment. These forms consist of:

- title, factors, emissions page; and a
- summary page that describes and calculates the estimated emissions from an activity.

Respondents are asked to categorize emissions into 9 factors:

- natural gas prime movers, diesel-fired prime movers, heaters/boilers/firetubes/natural gas-fired,
- gas flares, liquid flares, tanks, fugitives, glycol dehydrator vent, and gas venting.

**BOEM-0141—ROV Survey Report** is submitted to report the observations and information recorded from two sets of remotely operated vehicle (ROV) monitoring surveys to identify high-density benthic communities that may occur on the seafloor in deep water. The form asks respondents for general operator/facility information and a transect drawing of the survey pattern made by the ROV; a video tape (VHS) and transcript of what was visualized at the bottom throughout deployment (the form includes a guide to animal groups and a guide to physical features), and any additional imagery that helps depict bottom conditions. We use the information when such areas are found to help design mitigation measures to avoid these areas and to help assess the effectiveness of avoidance criteria.

**BOEM-0142—Environmental Impact Analysis Worksheet** is a fill-in-the-blank form that is submitted to identify the environmental impact-producing factors (IPFs) for the listed environmental resources. We use the information to help assess impacts and determine compliance with the National Environmental Policy Act. Respondents are asked to fill in the blank by placing an “x” in the space under each IPF category associated with the proposed activity that may impact a particular environmental resource.

**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 electronically. However, because of the various types of information submitted with the plans (maps, surveys, spreadsheets, etc.), some of the submission may not readily lend itself to electronic commerce. In some instances, paper copies of the non-proprietary information submitted in the plans and accompanying information may continue to be necessary for review by States, local governments, and the public.

**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.**

BOEM has determined that information submitted in the Exploration Plan is essential to BOEM’s statutory and regulatory responsibilities. Some information, such as vessel mobilizations and tow plans, falls under the jurisdiction of other Federal agencies, such as the Coast Guard and BSEE.

The information collected is unique to the proposed operations. If information has already been submitted and is readily available to BOEM, respondents may reference the earlier submission. If changes to plans are necessary or required, only information related to the required changes must be resubmitted.

With respect to air emissions information, the OCS Lands Act authorizes the Department of the Interior to regulate activities authorized by BOEM in the Central and Western Gulf of Mexico and offshore the North Slope Borough of Alaska. (Per the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has air quality jurisdiction over all other parts of the OCS.) Under the OCL Lands Act, DOI is limited to regulating offshore emissions of criteria and their precursor pollutants to the extent they significantly affect the air quality of any state.

BOEM requires an air emission summary to be submitted with the plans (before the activity begins) in

order to prepare the appropriate NEPA documents (Environmental Assessments, Environmental Impact Statements, etc.) and to assure that the proposed activity will not violate the Clean Air Act.

Also, as it relates to ESA, no other Federal agency has the responsibility for collecting information relative to the impacts of OCS oil and gas exploration, development, and production activities. Similar information does not exist and has not been collected. Respondents will report to BOEM, and, in turn, BOEM will provide the required information to NOAA Fisheries and FWS, as appropriate. Therefore, there is no duplicate burden to the public.

**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. Many of the OCS lessees and operators have less than 500 employees and are considered small businesses as defined by the Small Business Administration. BOEM is required to comply with the OCS Lands Act, ESA and the NOAA Fisheries' Biological Opinions; therefore, we cannot reduce the burden 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 BOEM did not collect the information, we could not carry out the mandate of the OCS Lands Act, as amended, which specifies that exploration or development and production activities on the OCS may not be conducted until comprehensive plans are submitted and approved. Extensive data and information are necessary to make informed decisions on whether to approve these plans or require appropriate changes.

To be exempt from the prohibitions of Section 9 of the ESA (which prohibits taking of listed species), BOEM must comply with the nondiscretionary terms and conditions that outline required reporting and monitoring requirements. To monitor the impact of incidental takes resulting from exploration, development, and production activities associated with lease sales, BOEM must report the progress of the action and its impact on the species to NOAA. The lease sales provide hydrocarbon resources to meet the Nation's energy needs and are the second highest revenue generation mechanism for the U.S. Treasury.

The information is collected only once for each particular plan and/or is dependent only upon the activities of the respondents; therefore, the frequency of collection is not applicable nor an issue.

**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;***

Vessel crews must report sightings of any injured or dead protected species (marine mammals and sea turtles) immediately to the NOAA Fisheries Stranding Hotline at (877) 433-8299. In addition, if the injury or death was caused by an OCS-related activity, operators must provide notification within 24 hours of the strike by email to [protectedspecies@bsee.gov](mailto:protectedspecies@bsee.gov). This immediate response is necessary to comply with the NOAA Fisheries' mandate to report "takes" promptly.

***(b) requiring respondents to prepare a written response to a collection of information in fewer***

***than 30 days after receipt of it;***

BOEM requires that any marine mammal observation and monitoring reports be submitted on the 1<sup>st</sup> and 15<sup>th</sup> of each month via email. This schedule is beneficial for two reasons: (1) data and sightings gathered over a 2-week period should be a manageable quantity that can be recorded and sent quickly and easily, by mail or electronically and (2) the rotation of a crew on typical seismic operations could make less frequent reporting problematic. A bimonthly reporting schedule will normally involve only one crew. However, there is a requirement to report within 24 hours the sighting of a sperm whale in the exclusion zone (that results in a shut down of air guns). This immediate response is necessary for BOEM to comply with the NOAA Fisheries' mandate to report "takes" promptly.

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

The number of copies of plans and accompanying information respondents are required to submit varies depending on the location of the proposed activities. BOEM is under a mandated timeframe to review and make decisions on these plans, which can be quite complex, voluminous, and detailed. Several program areas within BOEM must review the information simultaneously to meet the mandated timeframe. If BOEM had to reproduce the necessary copies for its internal reviews, it would be extremely difficult, if not impossible, to meet the deadlines imposed by the OCS Lands Act, as amended. Therefore, respondents submitting paper copies are required to submit four "proprietary" copies of their plans. In addition, the OCS Lands Act also requires that we make non-proprietary (public information) copies available for simultaneous review by State and local government entities. Depending on the State(s) involved, BOEM needs from 3 to 17 public information copies to distribute to the States and local governments having an interest in the project, as well as a copy to make available for the general public to review. Companies have indicated on occasion that they have no objection to providing the extra copies to expedite the review processes.

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

It is also necessary that respondents retain data and information longer than 3 years. Much of the supporting information is to be retained for the duration of the project. However, this type of information is such that respondents would be very unlikely to dispose of it sooner. It contains valuable background data and analyses that they would not want to duplicate should it be needed during the life of the exploration or development and production project. We consider the burden only to make the information available to BOEM if necessary.

***(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;***

Not applicable in this collection.

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

Not applicable in this collection.

***(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***

This collection does not include a pledge of confidentiality not supported by statute or regulation.

***(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.***

BOEM will protect information considered proprietary under the Freedom of Information Act (5 U.S.C. 552), under regulations at 30 CFR 550.197, "Data and information to be made available to the public or for limited inspection," and 30 CFR part 552, "Outer Continental Shelf (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 1320.11, BOEM is providing for and has described the 60-day review and comment process in the preamble of the proposed rule. We will address comments received on the information collection in the final rulemaking process.

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

BOEM 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.***

BOEM will protect information considered proprietary under the Freedom of Information Act (5 U.S.C. 552), under regulations at 30 CFR 550.197, "Data and information to be made available to the public or for limited inspection," and 30 CFR Part 552, "Outer Continental Shelf (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.***

The collection does not include sensitive or private questions.

***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, and sulphur lessees and 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, and completing and reviewing the collection of information. Submissions are generally on occasion, semi-monthly, and vary by section. We estimate the total annual burden is 433,608 hours, 4,265 responses, and \$3,393,435 nonhour burden costs.

### BURDEN BREAKDOWN

[Current requirements in regular font; proposed *expanded requirements shown in italic font*]

Citation 30 CFR 550 Subpart B and NTLs	Reporting & Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Burden Hours
		Non-Hour Costs		
200 thru 206	General requirements for plans and information; fees/refunds, etc.	Burden included with specific requirements below.		0
201 thru 206; 211 thru 228; 241 thru 262	BOEM posts EPs/DPPs/DOCDs on FDMS, and receives public comments in preparation of EAs.	Not considered IC as defined in 5 CFR 1320.3(h)(4).		0
		<b>Subtotal</b>	<b>0</b>	<b>0</b>
<b>Ancillary Activities</b>				
208; NTL 2009- G34*	Notify BOEM in writing, and if required by the Regional Supervisor notify other users of the OCS before conducting ancillary activities.	11	61 notices	671
208; 210(a)	Submit report summarizing & analyzing data/information obtained or derived from ancillary activities.	2	61 reports	122
208; 210(b)	Retain ancillary activities data/information; upon request, submit to BOEM.	2	61 records	122
		<b>Subtotal</b>	<b>183 responses</b>	<b>915 hours</b>
<b>Contents of Exploration Plans (EP)</b>				
209; 231(b); 232(d); 234; 235; 281; 283; 284; 285; NTL 2015- N01	Submit new, amended, modified, revised, or supplemental EP, or resubmit disapproved EP, including required information; withdraw an EP.	150	345 changed plans	51,750
209; 211 thru	Submit EP and all required information (including,	600	163	97,800



Citation 30 CFR 550 Subpart B	Reporting & Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Burden Hours
		Non-Hour Costs		
228; NTL 2015-N01*	but not limited to, submissions required by BOEM Forms 0137, 0138, 0142; lease stipulations; reports, including shallow hazards surveys, H2S, G&G, archaeological surveys & reports (550.194)***), in specified formats. Provide notifications.	\$3,673 x 163 EP surface locations = \$598,699		
210; 220(a)-(c); 291; 292	For existing Arctic OCS exploration activities: revise and resubmit Arctic-specific information, as required.	700	1	700
202; 211; 216; 219; 220(a)-(c); 224; 227	For new Arctic OCS exploration activities: submit required Arctic-specific information with EP.	600	1	400
<b>Subtotal</b>		<b>510 responses</b>		<b>150,650 hours</b>
		<b>\$598,699 Non-Hour Costs</b>		
<b>Review and Decision Process for the EP</b>				
235(b); 272(b); 281(d)(3)(ii)	Appeal State's objection.	Burden exempt as defined in 5 CFR 1320.4(a)(2), (c).		0
<b>Contents of Development and Production Plans (DPP) and Development Operations Coordination Documents (DOCD)</b>				
209; 266(b); 267(d); 272(a); 273; 281; 283; 284; 285; NTL 2015-N01	Submit amended, modified, revised, or supplemental DPP or DOCD, including required information, or resubmit disapproved DPP or DOCD.	235	353 changed plans	82,955
241 thru 262; 209; NTL 2015-N01	Submit DPP/DOCD and required/supporting information (including, but not limited to, submissions required by BOEM Forms 0137, 0139, 0142; lease stipulations; reports, including shallow hazards surveys, archaeological surveys & reports (CFR 550.194)), in specified formats. Provide notification.	700	268	187,600
		\$4,238 x 268 DPP/DOCD wells = \$1,135,784.		
<b>Subtotal</b>		<b>621 responses</b>		<b>270,555 hours</b>
		<b>\$1,135,784 Non-hour costs</b>		
<b>Review and Decision Process for the DPP or DOCD</b>				
267(a)	Once BOEM deemed DPP/DOCD submitted; Governor of each affected State, local government official; etc., submit comments/recommendations.	Not considered IC as defined in 5 CFR 1320.3(h)(4)		0
267(b)	General public comments/recommendations submitted to BOEM regarding DPPs or DOCDs.	Not considered IC as defined in 5 CFR 1320.3(h)(4).		0
269(b)	For leases or units in vicinity of proposed development and production activities RD may require those lessees and operators to submit information on preliminary plans for their leases and units.	3	1 response	3
<b>Subtotal</b>		<b>1 response</b>		<b>3 hours</b>
<b>Post-Approval Requirements for the EP, DPP, and DOCD</b>				
280(b)	In an emergency, request departure from your approved EP, DPP, or DOCD.	Burden included under 1010-0114.		0
281(a)	Submit various BSEE applications for approval and submit permits.	Burdens included under appropriate subpart or form (1014-		0

Citation 30 CFR 550 Subpart B	Reporting & Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Burden Hours
		Non-Hour Costs		
		0003; 1014-0011; 1014-0016; 1014-0018).		
282	Retain monitoring data/information; upon request, make available to BOEM.	4	150 records	600
	Prepare and submit monitoring plan for approval.	2	6 plans	12
282(b)	Prepare and submit monitoring reports and data (including BOEM Form 0141 used in GOMR).	3	12 reports	36
284(a)	Submit updated info on activities conducted under approved EP/DPP/DOCD.	4	56 updates	224
		<b>Subtotal</b>	<b>224 responses</b>	<b>872 hours</b>
<b>Submit CIDs</b>				
296(a); 297	Submit CID and required/supporting information; submit CID for supplemental DOCD or DPP.	375	14 documents	5,250
			\$27,348 x 14 = \$382,872	
296(b); 297	Submit a revised CID for approval.	100	13 revisions	1,300
		<b>Subtotal</b>	<b>27 responses</b>	<b>6,550 hours</b>
			<b>\$382,872 non-hour costs</b>	
<b>Seismic Survey Mitigation Measures and Protected Species Observer Program NTL</b>				
NTL 2016-G02; 211 thru 228; 241 thru 262	Submit to BOEM observer training requirement materials and information.	1.5 hours	2 sets of material	3
	Training certification and recordkeeping.	1 hour	1 new trainee	1
	During seismic acquisition operations, submit daily observer reports semi-monthly.	1.5 hours	344 reports	516
	If used, submit to BOEM information on any passive acoustic monitoring system prior to placing it in service.	2 hours	6 submittals	12
	During seismic acquisition operations, submit to BOEM marine mammal observation report(s) semi-monthly or within 24 hours if air gun operations were shut down.	1.5 hours	1,976 reports	2,964
	During seismic acquisition operations, when air guns are being discharged, submit daily observer reports semi-monthly.	1.5 hours	344 reports	516
	Observation Duty (3 observers fulfilling an 8 hour shift ea for 365 calendar days x 4 vessels = 35,040 man-hours). This requirement is contracted out; hence the non-hour cost burden.			3 observers x 8 hrs x 365 days = 8,760 hours x 4 vessels observing = 35,040 man-hours x \$52/hr = \$1,822,080.
		<b>Subtotal</b>	<b>2,673 responses</b>	<b>4,012 hours</b>
			<b>\$1,822,080 Non-Hour Costs</b>	
<b>Vessel Strike Avoidance and Injured/Protected Species Reporting NTL</b>				
NTL 2016-G01; 211 thru 228; 241 thru 262	Notify BOEM within 24 hours of strike, when your vessel injures/kills a protected species (marine mammal/sea turtle).	1 hour	1 notice	1
		<b>Subtotal</b>	<b>1 response</b>	<b>1 hour</b>
<b>General Departure</b>				
200 thru 299	General departure and alternative compliance requests not specifically covered elsewhere in Subpart B regulations.	2	25 requests	50
		<b>Subtotal</b>	<b>25 responses</b>	<b>50 hours</b>
		<b>TOTAL BURDEN</b>	<b>4,265 Responses</b>	<b>433,608 Hours</b>

Citation 30 CFR 550 Subpart B	Reporting & Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Burden Hours
		Non-Hour Costs		
		\$3,939,435 Non-Hour Costs		

\* The identification number of NTLs may change when NTLs are reissued periodically to update information.

***(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 be included under “annual Cost to the Federal Government.”***

The average respondent cost is \$110\*/hour (rounded). This cost is broken out in the below table using the Bureau of Labor Statistics data for the Houston, TX area. See BLS website: [https://www.bls.gov/oes/current/oes\\_26420.htm](https://www.bls.gov/oes/current/oes_26420.htm).

Position	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.4** x \$/hour)	Percent of time spent on collection	Weighted Average (\$/hour)
Secretaries and Administrative assistants (43-6011)	\$31	\$43	15%	\$6
Petroleum Engineers, Geologists (17-2171)	\$88	\$123	70%	\$86
Supv. Engineer (17-2171)	\$88	\$123	15%	\$18
<b>Weighted Average (\$/hour)</b>				<b>\$110</b>

\* Note that this BLS source reflects their last update from May 2019.

\*\* A multiplier of 1.4 (as implied by BLS news release USDL-20-1736, September 17, 2020 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

Based on a cost factor of \$110 per hour, we estimate the total annual cost to industry as a dollar equivalent is \$47,696,880 (\$110 x 433,608 hours = \$47,696,880).

***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 reflect 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.**

There are three non-hour costs associated with this information collection that are cost recovery fees. They consist of fees being submitted with EP's (\$3,673), DPP's or DOCD's (\$4,238), and CID's (\$27,348).

There is also one non-hour cost burden associated with the Protected Species Observer Program. The cost associated with this program is due to observation activities that are usually subcontracted to other service companies with expertise in these areas. Since all of the observation duty and reporting would be done while on the vessel and by contractors, these requirements were calculated as non-hour cost burdens. See the hours, fees, and costs in the burden table in A.12.

We estimate that the annual total non-hour cost burden is \$3,939,435.

**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 \$66/hour. This cost is broken out in the below table using the 2020 Office of Personnel Management salary data for the REST OF THE UNITED STATES.

Position	Grade	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.6 x \$/hour)	Percent of time spent on collection	Weighted Average (\$/hour)
Clerical	GS-7/5	\$23	\$37	5%	\$2
Regulatory	GS-11/5	\$35	\$56	40%	\$22
Engineers/Geologists	GS-13/5	\$50	\$80	25%	\$20
Biologist/Physical Scientist	GS-12/5	\$42	\$67	25%	\$17
Supv. Physical Scientist	GS-14/5	\$59	\$94	5%	\$5
<b>Weighted Average (\$/hour)</b>					<b>\$66</b>

\* A multiplier of 1.6 (as implied by BLS news release USDL-20-1736, September 17, 2020 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

To analyze and review the information required by Subpart B and related NTLs, we estimate the Government will spend an average of approximately 1/4 hour for each hour spent by respondents for a total of 108,402 hours (433,608 divided by 4 = 108,402). Based on a cost factor of \$66 per hour, the total gross annualized cost to the Government is \$7,154,532.

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

The current OMB inventory includes 436,438 annual burden hours for the collection of information in 30 CFR 550, Subpart B.

This proposed rule would add and remove requirements for submitting exploration plans and other information before conducting oil and gas exploration drilling activities on the Arctic OCS. If this rule becomes final and effective, annual burden hours for OMB control number 1010-0151 would decrease by 2,830 hours. BOEM is adjusting the annual burden hours for removal of most of the IOP requirements (under 30 CFR 550.204) and for new and revised provisions (under 30 CFR 550.202, 210-211, 550.220, 550.224, 550.227, and 550.291-292).

BOEM proposes to remove the IOP regulations by deleting 30 CFR 550.204 and removing the corresponding references to the IOP from 30 CFR 550.200 and 550.206. BOEM's existing requirement to submit the IOP at least 90 days before the lessee or operator files an EP would be eliminated. The data and information requested in the IOP is largely unnecessary in light of the information already collected in the EP. The current approval for OMB control number 1010-0151 counts the similar burdens found in IOPs and EPs in both. Therefore, BOEM would remove the burdens attributed to the IOPs, and keep the burdens attributed to EPs. Removing the IOP provision would decrease the annual burden hours by 1 response and 2,880 hours. (- 1 response and 2,880 annual burden hours).

The proposed rule would add a requirement to 30 CFR 550.211(b) designed to describe operational safety procedures that the operator has developed specific to conditions relevant on the Arctic OCS in the EP. These requirements were previously included in the IOP requirements that are removed from this rulemaking. Retaining this provision would lessen the 2,880 hour burden decrease by 50 annual burden hours (i.e., by retaining 50 annual burden hours).

BOEM proposes to revise 30 CFR 550.220(c)(1) to include a requirement to describe how exploratory drilling would be designed and conducted (including how all vessels and equipment will be designed built, and/or modified) to account for Arctic OCS conditions and how such activities will be managed and overseen as an integrated endeavor. This revised provision would not add any new requirements beyond those in existing regulations. This change would not add impose additional burdens on the lessee or operators. BOEM is proposing to revise 30 CFR 550.220(c)(4) and (c)(6) by requiring the operator to provide a general description of how they will comply with 30 CFR 250.472 including a description of the termination of their operations.

BOEM estimates that the new requirements would decrease by 2,830 annual burden hours. Overall, the annual burden hours for this control number would decrease to a total of 433,608. The currently approved annual reporting and recordkeeping non-hour cost burden is \$3,939,435, and will remain the same with the information collection request.

***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.***

BOEM 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.***

BOEM will display the OMB control number and approval expiration date.

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

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.”