

Supporting Statement A
30 CFR 250, subpart H, Oil and Gas Production Safety Systems
OMB Control Number 1014-0003

Section 1.

Please list your title, company name, address and phone number.

Regulatory Project Advisor
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Section 2.

Please put the current industry hour burden under the far right column. The hours that were submitted in the previous information collection cycle are listed in the 3rd column.

Citation 30 CFR 250 Subpart H and NTL(s)	Reporting and Recordkeeping Requirement	Hour Burden submitted in 2018		Current Burden Hours
General Requirements				
800(a); 880(a)(1), (2)	Prior to production, request approval and pre-production inspection; notify BSEE 72 hours before commencement; notify upon commencement of production.	1		1
801(c)	Request evaluation and approval from OORP that includes all relevant information of other quality assurance programs by appropriate qualified entity; or third-party certification mark covering manufacture of SPPE.	34		50
801(c); 802(c)(1);	Independent third-party for reviewing and certifying various statements throughout this subpart.	\$30,000		
802(c)(1)	Maintain a description of the process used to ensure the device is designed to function as required in 802(a). Make available to BSEE.	1		1
802(c)(5), (e)	Document all manufacturing, traceability, quality control, installation, testing, repair, redress, performance, and inspection requirements, <i>etc.</i> Retain all required documentation of SPEE equipment until 1 year after the date of decommissioning the equipment.	2		2
803(a), (d)	Within 30 days of discovery and identification of SPPE failure, provide a written notice of equipment failure to manufacturer and Chief, OORP, or BSEE designee.	2		5
803(b), (d)	Document and determine the results of the SPPE failure within 120 days and corrective action taken; if appropriate, per requirements, give copy of report to manufacturer and Chief, OORP, or BSEE designee.	5		5
803(c), (d)	Submit to Chief of OORP or BSEE designee modified procedures you made if notified by manufacturer of design	2		2

	changes or you changed operating or repair procedures as result of a failure, within 30 days of changes.			
814(a); 815(b); 828(a); 829(b);	BSEE will approve on a case-by-case basis.	1		1
841(b)	Request District Manager approval of temporary repairs to facility piping not to exceed 30 days.	1		5
Surface and Subsurface Safety Systems – Dry Trees				
810; 816; 830	Submit request for a determination that a well is incapable of natural flow.	14		20
	Verify the no-flow condition of the well annually.	¼		2
Subsea and Subsurface Safety Systems – Subsea Trees				
831; 833(a), (b); 837(c)(5); 838(c); 874(g)(2), (h)(1)	Notify/contact BSEE: (1) if you cannot test all valves and sensors; (2) 48 hours in advance if monitoring ability affected; (3) primary USV designation changes; designating USV2 or another qualified valve; (4) resuming production; (5) 12 hours of detecting loss of communication; immediately if you cannot meet valve closure conditions.	Notifications		
		(1) ½		1
		(2) 2		1
		(3) 1		3
		(4) ½		1
		(5) ½		1
831	Submit a repair/replacement plan to monitor and test.	2		2
837(a)	Request approval to not shut-in a subsea well in an emergency.	½		1
837(b)(2); (c)(2)	Obtain approval to resume production (1) after communication is restored; (2) P/L PSHL sensor.	½		1
838(a)(2); 839(a)(2)	Verify closure time of USV upon request of BSEE.	2		2
838(c)(3)	Request approval to produce after loss of communication - include alternate valve closure table or alternate hydraulic bleed schedule.	2		2
Production Safety Systems				
842;	Submit application, and all required/supporting information, for a production safety system with > 125 components.	26		60
	25 – 125 components.	19		40
	< 25 components.	12		25
	Submit modification to application for production safety system with > 125 components.	13		48
	25 – 125 components.	10		30
	< 25 components.	7		17
842(b)	Your application must also include all required certification(s) [<i>i.e.</i> , hazards analysis, <i>etc.</i> ,] that the designs for mechanical and electrical systems were reviewed, approved, and stamped by registered professional engineer. [NOTE: Upon promulgation, these certification production safety systems requirements will be consolidated into the application hour burden for the specific components]	6		10
842(d)		6		6

	Submit a certification letter within 90-days after production that the as-built diagrams, piping, and instrumentation diagrams are on file, certified correct, and stamped by a registered professional engineer; submit all the as-built diagrams.	½		1
842(e)	Maintain records pertaining to approved design and installation features either the onshore field office, readily available offshore, or location available to BSEE; make available to BSEE upon request and retain for the life of the facility.	½		1
Additional Production System Requirements				
851(a)(2)	Request approval to continue using uncoded pressure and fired vessels.	2		2
851(b); 852(a)(2), (3); 858(b); 865(b)	Maintain most current pressure-recorder information at location available to BSEE for as long as information is valid.	35		35
851(c)(2)	Request approval for activation limits set less than 5 psi.	1		1
852(c)(1)	Request approval to vent to some other location.	1		1
852(c)(2)	Request a different sized and upstream location of the PSV.	1		1
852(e)(1)	Review manufacturer's Design Methodology Verification Report and IVA's certificate to ensure compliance.	1		1
855(a)	Uniquely identify all EDS stations. [NOTE: while this is considered a usual and customary business practice, not all companies have done this correctly. The burden listed is only for those who have new floating facilities.]	8		8
855(b)	Maintain ESD schematic listing control function of all safety devices on the platform, field office closest to facility, or at location conveniently available to BSEE for the life of the facility.	18		18
858(a)(3)	Request approval to use different procedure for gas-well gas affected.	1		1
859(a)(3), (4)	Post diagram of firefighting system; furnish evidence firefighting system suitable for operations in subfreezing climates.	8		8
859(c); 860(b), (c); related NTL(s)	Request approval to use a chemical-only fire system in lieu of a water system (including extensions up to 7 days of your approved request) by submitting, including but not limited to, submittal of justification and risk assessment (and all relevant information listed in the table of this section).	39		39
860(d)	Change(s) made after approval rec'd re 860(b) - document change; maintain the revised version at facility or closest field office for BSEE review/inspection; submit new request w/updated risk assessment for approval; maintain for life of facility.	½		1
861(b)	Annually conduct inspection of foam concentrates and tanks; make documentation of foam available to BSEE.	2		2
	Send foam concentrate sample(s) to authorized representative for quality condition testing.	\$418 per sample		
864	Maintain erosion control program records for 2 years; make available to BSEE upon request.	21		21
867(a)	Request approval of safety system/devices associated with temporary quarters prior to installation.	6		10
867(b)	Submit supporting information/ documentation if required by BSEE to install a temporary firewater system.	1		3
867(c)	Request approval to use temporary equipment for well testing/clean-up.	1		2

870(a)	Document PSL on your field test records w/delay greater than 45 seconds.	½		1
874(g)(3)	Submit request with alternative plan ensuring subsea shutdown capability.	2		2
874(h)(2)	Request approval to continue to inject w/loss of communication.	1		1
876	Document and retain, for at least 5 years, all tube-type heater information / requirements; make available to BSEE upon request. Have qualified 3rd party remove and inspect, repair or replace fire tube.	1		1
\$ for 3 rd party				
Safety Device Testing				
880(a)(3)	Notify BSEE and receive approval before performing modifications to existing subsea infrastructure.	½		1
880(d)(1)	Request approval for a well that is completed and disconnected from monitoring capability to exceed more than 24 months.	1		2
Records and Training				
890(a), (b)	Maintain records for 2 years on subsurface and surface safety devices to include, but limited to, status and history of each device; installation date and details, inspection, testing, repair, removal, adjustments, reinstallation, <i>etc.</i> ; at field office nearest facility AND a secure onshore location; make records available to BSEE.	48		48
890(c)	Submit annually a contact list (w/all required information) for all OCS operated facilities or submit when revised.	½		1
		½		1

Section 3.

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories from the SPE link. If other “Positions” are needed, please add to the table as appropriate.

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

Position	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.4* x \$/hour)	Percent of time spent on collection	Weighted Average (\$/hour)
Non-Engineering Technical (Regulatory)	\$53.00	\$75.00	100%	\$75.00
Non-Engineering Technical (Operations)	\$53.00	\$75.00	100%	\$75.00
Engineering – Production/Chemical	\$83.00	\$166.00	150%	\$249.00
Weighted Average (\$/hour)				\$399.00
Annualized Cost Burden				(\$829,920)

Section 4.

Are there any other annual “non-hour” cost burdens resulting from the required collection of information under 30 CFR 250, Subpart H that are not currently listed below? If so, please provide the total annual non-hour cost burden resulting from the collection of information. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing).

This ICR includes 19 non-hour cost burdens

In § 250.842 there are 10 cost recovery fees; as well as 6 non-hour cost burdens for Professional Engineering (PE) costs:

- Submit application for a production safety system with > 125 components - \$5,426 per submission; \$14,280 per offshore visit; and \$7,426 per shipyard visit. PE costs of \$126.47/hour.
 - 1 submittal per year at \$5,426
 - **Total** = 1 x \$5,426 = **\$5,426**
- Submit modification to application for production safety system with > 125 components - \$605 per submission and PE costs of \$126.47/hour.
 - 8 facilities with 3 modifications per year at \$605
 - **Total** = 8 x 3 x \$605 = **\$14,520**
- Maintaining a regulatory compliance database for collection and distribution of information on production safety systems. This is for CTG SMART database
 - 8 facilities at \$5000 per month
 - **Total** = 8 x 5000 x 12 = **\$480,000**

Do you have any comments on the availability of the data we are requesting, the frequency of collection, the clarity of instructions and recordkeeping, the reporting format, or on the data elements that are reported to BSEE?

- Most difficult thing is trying to collect the non-hour costs associated with all the submittals.
- The instructions could have more detail and examples to help with understanding the data collection.
- If BSEE could present a company's prior submittal, that would help in comparison and updating information.
- How is the data used? Is this a requirement for reporting and how often?
- How is the information used to improve/reduce the burden on the industry?