

**Supporting Statement A**  
**30 CFR 250, Subpart G, Well Operations and Equipment**  
**Rig Movement Notification Report, Form BSEE-0144**  
**OMB Control Number 1014-0028**  
**OMB Expiration Date: January 31, 2023**

**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.

**Specific Instructions**

**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. 1334), authorizes the Secretary of the Interior to prescribe rules and regulations necessary for the administration of the leasing provisions of that Act related to mineral resources on the OCS. Such rules and regulations will apply to all operations conducted under a lease, right-of-way, or a right-of-use and easement. Operations on the OCS must preserve, protect, and develop oil and natural gas resources in a manner that is consistent with the need to make such resources available to meet the Nation's energy needs as rapidly as possible; to balance orderly energy resource development with protection of human, marine, and coastal environments; to ensure the public a fair and equitable return on the resources of the OCS; and to preserve and maintain free enterprise competition.

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. Under the Department of the Interior's implementing policy, the Bureau of Safety and Environmental Enforcement (BSEE) is required to charge fees for services that provide special benefits or privileges to an identifiable non-Federal recipient above and beyond those which accrue to the public at large. Various applications and/or permits are subject to cost recovery, and BSEE regulations specify service fees for these requests.

In addition to the general rulemaking authority of OCSLA, section 301(a) of the Federal Oil and Gas Royalty Management Act (FOGRMA), 30 U.S.C. 1751(a), grants authority to the Secretary

to prescribe such rules and regulations as are reasonably necessary to carry out FOGRMA's provisions. While the majority of FOGRMA is directed to royalty collection and enforcement, some provisions apply to offshore operations. For example, section 108 of FOGRMA, 30 U.S.C. 1718, grants the Secretary broad authority to inspect lease sites for the purpose of determining whether there is compliance with the mineral leasing laws. Section 109(c)(2) and (d)(1), 30 U.S.C. 1719(c)(2) and (d)(1), impose substantial civil penalties for failure to permit lawful inspections and for knowing or willful preparation or submission of false, inaccurate, or misleading reports, records, or other information. Because the Secretary has delegated some of the authority under FOGRMA to BSEE, 30 U.S.C. 1751 is included as additional authority for these requirements.

This authority and responsibility are among those delegated to BSEE. The regulations at 30 CFR 250, subpart G and associated form concern well operations and equipment and are the subject of this collection. This request also covers any related Notices to Lessees and Operators (NTLs) that BSEE issues to clarify, supplement, or provide additional guidance on some aspects of our regulations. Please see A.12 for a full breakout of the specific information collection.

***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.***

BSEE uses the information to ensure safe drilling, workover, completion, and decommissioning operations and to protect the human, marine, and coastal environment. BSEE analyzes and evaluates these information/requirements to reduce the likelihood of a similar Deepwater Horizon event and to reduce the risk of fatalities, injuries, and spills. BSEE also utilizes these requirements in the approval, disapproval, or modification process for well operations.

Specifically, BSEE uses the information in Subpart G to ensure:

- certain well designs and operations have been reviewed by appropriate third parties/engineers/classification societies that, after one year, have been approved by BSEE;
- rig tracking data is available to locate rigs during major storms;
- casing or equipment repairs are acceptable and tested;
- up-to-date engineering documents are available;
- the Blowout Preventer (BOP) and associated components are fit for service for its intended use;
- that the BOP will function as intended;
- that BOP components are properly maintained and inspected;
- the proper engineering reviews and approvals for all BOP designs, repairs, and modifications are met.

Rig Movement Notification Report, Form BSEE-0144

We use the information to schedule inspections and verify that the equipment being used complies with approved permits. The information on this form is used by all 3 regions, but primarily in the Gulf of Mexico (GOM), to ascertain the precise arrival and departure of all rigs in OCS waters in the GOM. The accurate location of these rigs is necessary to facilitate the scheduling of inspections by BSEE personnel.

Items in **BOLD** are new changes to the form this renewal cycle. Information on form BSEE-0144:

- General Information – Identifies the date, lease operator, rig name/type/representative, and rig telephone number (**on location**).
- Rig Arrival Information – Identifies the rig arrival date; what type of work will be scheduled; if the rig is new to OCS and location rig came from; relevant well information; duration of operations, well surface location information, structure location information, **helideck information**, and optional information.
- Rig Departure Information – Identifies the rig departure date, well status, relevant well information, being skidded, obstruction issues, and optional information.
- Rig Stacking Information – Identifies rig arrival/departure date, warm or cold stacked and location, any modification, repairs, or construction and the date, relevant well information, optional information, obstruction issues.
- Certification Statement declaring the information submitted is complete and accurate to the best of signatory's knowledge.
- BSEE OCS Contact Information (**Updated**).

**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.**

BSEE encourages respondents to use the forms available on the website and submit them electronically as attachments to secure emails; or to use eWell--an internet-based system that provides respondents with the ability to submit most of the forms listed in this collection electronically using a secure web application in lieu of submitting paper forms. We estimate that an average of 90 percent of submittals pertaining to this collection will be submitted electronically.

**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.**

The DOI has several Memoranda of Understanding (MOU) that define the responsibilities of each agency with respect to activities in the OCS. These MOUs are effective in avoiding duplication of regulations and reporting requirements. The information collected is specific to a well, a lessee/operator, or a particular request for BSEE approval and is unique to the site and well operation.

**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 an economic effect on a number of small entities. Any direct effects primarily impact the OCS lessees and operators. However, many of these OCS lessees and operators may have less than 500 employees and would be considered small businesses as defined by the Small Business Administration. Regulations require safe work practices and protection of the environmental resources; therefore, the hour burden on any small entity subject to these regulations and associated collections of information cannot be reduced 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 BSEE did not collect the information, we could not determine whether lessees and operators are properly providing for the safety of drilling, workover, completion, and decommissioning operations, and the protection of the environment and resources. The information is generally collected on occasion of drilling activity and initiated by respondents' activity. During drilling operations, respondents must submit reports on a daily (or weekly in the Gulf of Mexico) basis. We must have accurate and timely information on the condition of the drilling site to be able to make informed decisions on requests for alternative compliance and departures and for inspection purposes. Respondents maintain the information reported on a daily basis, and the burden of submitting to BSEE is not substantial. Quarterly reporting would be ineffectual.

BSEE also needs this information for the approval, disapproval, or modification process for well operations; to ensure cement jobs are adequate for the well conditions, and that industry can demonstrate source control and containment capabilities; information on production packer setting depth would ensure consistent permitting.

**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;*** Depending on the operation, respondents will have to submit a Rig Movement Notification Report (BSEE-0144) every time a rig is moved on or off location (again, depending on the operation being performed, some respondents will submit more than quarterly, but is generally

on occasion).

***(b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;***

Not applicable in this collection.

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

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

- Respondents must maintain design, maintenance, inspection, and repair records for the service life of the equipment. Results of BOP inspections and maintenance actions may have to be retained for more than 2 years, if so directed, due to any potential operational design parameter issues.

- A detailed report documenting the once every 5-year inspection, along with any problems and corrections will need to be maintained from one inspection to the next to verify any recordable actions between inspections.

- Respondents are required to retain some well completion/well workover records until the well is permanently plugged or abandoned or the records are forwarded with a lease assignment. This could be longer than 3 years; however, it is critical that the records be available that relate to any alteration of the completion configuration or that affect activities on a hydrocarbon-bearing zone.

***(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;***

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

***(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***

***(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.***

Not applicable in this collection.

***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 1320.11, 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 1320.8(d), BSEE provided a 60-day notice in the *Federal Register* on January 20, 2022 (87 FR 3121). Also, 30 CFR 250.199 explains that BSEE will accept comments at any time on the information collection aspects of 30 CFR 250. We display the OMB control number and provide the address for sending comments to BSEE. We received no comments in response to the *Federal Register* notice or unsolicited comments from respondents covered under these regulations.

To prepare this ICR, companies were contacted to determine the estimated burden this subpart places on respondents: The following company representatives that commented were:

Chevron, Regulatory Specialist, (985) 773-6213, 100 Northpark Blvd., Covington, LA 70433

BP Exploration & Production Inc., Senior Compliance Advisor, (281) 995-2815, 501 Westlake Park Blvd., Houston, TX 77079

Exxon Mobil Corporation, Regulatory Specialist, (832) 625-4583, 22777 Springswoods Village Parkway; Spring, TX, 77389

Shell Exploration and Production Company, Gulf of Mexico Subsurface Regulatory Manager, (504) 425-7673, 701 Poydras, New Orleans, LA, 70139

All the different reporting and recordkeeping requirements that are listed in the Subpart G burden table (Section A.12), were thoroughly reviewed by the company representatives listed. These representatives had no concerns regarding the availability of data, frequency of collection, clarity of instructions, and elements being collected at this time. The companies that replied to our request provided the burden estimates that are reflected in Section A.12.

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

BSEE 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.***

We protect information considered proprietary under the Freedom of Information Act (5 U.S.C. 552) and DOIs implementing regulations (43 CFR 2), and under regulations at 30 CFR Part 250.197, *Data and information to be made available to the public or for limited inspection*, 30 CFR Part 252, *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 comprise Federal oil and gas OCS lessees and operators. It should be noted that not all of the potential respondents will submit information at any given time, 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 the collection of information. Responses to this collection of information are mandatory or are required to obtain or retain a benefit. Submissions are generally on occasion, daily, weekly, monthly, quarterly, and biennially, depending upon the requirement. We estimate the total annual reporting and recordkeeping burden is 350,615 hours. Refer to the chart for a breakdown of the burden hours.

#### **BURDEN TABLE**

BSEE-Approved Verification Organization = BAVO; is being replaced with Independent Third Party (ITP).

30 CFR 250 Subpart G	Reporting & Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (rounded)
701; 720(a), (c) (2); 730(d) (1) (250.141)	Request alternative procedures or equipment from District Manager; along with any supporting documentation/ information required.	Burden cover under 1014-0022.		0
702 (250.142)	Request departures from District Manager; include justification; and submit supporting documentation if applicable.	Burden cover under 1014-0022.		0
710(a)	Instruct crew members in safety requirements of operations - record dates and times of meetings, include potential hazards; make available to BSEE.	0.75	18,000 meetings	13,500
710(b); 738(p)	Prepare a well-control drill plan for each well, including but not limited to instructions re components of BOP, procedures, crew assignments, established times to complete assignments, etc. Keep/post a copy of the plan on the rig at all times; post on rig floor/bulletin board.	0.5	1,528 plans	764
711(b), (c)	Record in the daily report: time, date, and type of drill conducted; time re diverter or BOP components; total time for entire drill.	1	2,571 drills	2,571
712(a), (b), (f)	Notify BSEE of all rig movements on or off locations.	0.25	50 notices	13
	Rig movements reported on Rig Movement Notification Report (Form BSEE-0144). Including MODUs, platform rigs; snubbing units, lift boats, wire-line units, and coiled tubing units 24 hours prior to movement; if the initial date changes by more than 24 hours, submit updated BSEE-0144.	0.25	170 forms	43
		0.25	1,700 updates	425
712(c), (e)	Notify District Manager if MODU or platform rig is to be warm or cold stacked on Form BSEE-0144; notify District Manager where the rig is coming from when entering OCS waters.	0.5	50 notifications	25
712(d)	Prior to resuming operations, report to District Manager any construction repairs or modifications that were made to the MODU or rig.	2	10 responses	20
713	Submit MODU information if being used for well operations with your APD/APM.	Burden covered under 1014-0025 for APD; and 1014-0026 for APM.		0
713(a), (b)	Collect and report additional information for Fitness/Foundation requirements if sufficient information is not available.	5	30 responses	150
			900 responses	4,500
713(b)	Reference to Exploration Plan, Development and Production Plan, and Development Operations Coordination Document (30 CFR 550, Subpart B).	Burden covered under 1010-0151.		0
713(c)(1)	Submit 3rd party review of drilling unit according to 30 CFR 250, Subpart I.	Burden covered under 1014-0011.		0
713(c)(2); (417(c)(2)	Have a Contingency Plan that addresses design and operating limitations of MODU.	Burden covered under 1014-0025.		0
713(d) (417(d))	Submit current certificate of inspection/ compliance from USCG and classification; submit documentation of operational limitations by a classification society. 8	Burden covered under 1014-0025.		0
714	Develop and implement dropped objects plan with supporting documentation/ information; any additional information required by the District Manager; make available to BSEE upon request.	40	40 plans	1,600
715	GPS for MODUs	1	5 rigs	5



***(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 not be included here.***

The average respondent cost is \$137/hour (rounded). This cost is broken out in the below table using the Society of Petroleum Engineers Salary Survey data dated December 2020. See SPE.org website: <https://www.spe.org/industry/docs/2020-Salary-Survey-Highlight-Report.pdf>.

<b>Position</b>	<b>Base Pay Hourly Rate (\$/hr)</b>	<b>Hourly Rate including Benefits (1.4* x \$/hr)</b>	<b>Percent of time spent on collection</b>	<b>Weighted Average (\$/hour/rounded)</b>
Non-Engineering Technical	\$67.79	\$94.90	20%	\$19
Engineers - Drilling	\$109.04	\$152.66	60%	\$92
Earth Science/Geologist	\$93.60	\$131.04	20%	\$26
<b>Weighted Average (\$/hour)</b>				<b>\$137</b>

\*A multiplier of 1.4 for private industry (as implied by BLS news release USDL-22-1176, June 16, 2022 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

Based on a cost factor of \$137 per hour, we estimate the hour burden as a dollar equivalent is \$48,034,255 (\$137 x 350,615 hours = \$48,034,255).

***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).***

***(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.***

We have identified two non-hour cost burdens:

1. Since the lessees and operators have already installed the GPS systems, we estimate a non-hour cost burden of \$102,500 which consists of:

- replacing/repairing locator devices and/or adding devices for new MODUs added to the group; 20 devices per year for replacement and/or new x \$325.00 = \$6,500\*.

- paying monthly rental fees for GPS tracking purposes only, 40 rigs x \$50/month = (\$600/year per 1 rig) = \$24,000\*.

or

- paying rental fees for the GPS devices themselves as well as associated tracking information. 40 rigs @ \$1,800 per year = \$72,000\*.

2. Independent Third-Party costs for \$6,630,000 (1,300 x \$5,100 (ITP fee) = \$6,630,000). The estimate for an Independent Third Party is based on and provided by BSEE's Subject Matter Experts (SMEs) and their experience with the requirements, and ITP work involved/to be done. The SMEs regularly talk with the third parties and operators, so they have a better understanding of the tasks needed to fulfill the regulations. There is no public information available to cite for the estimate of ITP costs.

The total non-hour cost burdens are \$6,732,500. We have not identified any other non-hour cost burdens associated with this collection of information. See burden table in A.12 for a breakdown of the burdens.

***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.***

To analyze and review the information required by Subpart G, we estimate the Government will spend an average of approximately 0.75 hour for each hour spent by the respondents for a total of 120,632 (rounded) hours.

The average government cost is \$91/hour (rounded). This cost is broken out in the below table using the Office of Personnel Management salary data for the REST OF THE UNITED STATES (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/>).

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	\$24.30	\$38.88	5%	\$1.94
Petroleum Engineer	GS-13/5	\$51.25	\$82.00	60%	\$49.20
Supv. Petroleum Engineer	GS-15/5	\$71.24	\$113.98	35%	\$39.89
<b>Weighted Average (\$/hour)</b>					<b>\$91.03</b>

\*A multiplier of 1.6 for government employees (as implied by BLS news release USDL-22-1176, June 16, 2022 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

Based on a cost factor of \$91 per hour, we estimate the total annual cost to Government is \$23,929,451 (350,615 hours x 0.75 = 262,961 (rounded) hours x \$91 = \$23,929,451).

**15. Explain the reasons for any program changes or adjustments.**

The current OMB inventory for this collection is 160,842 burden hours. In this submission, we are requesting 350,615 burden hours. This represents an adjustment increase of +189,773 and is due to changes in the number of submissions BSEE received. Below is a breakdown table of the changes made.

The OMB current non-hour cost burden is \$867,500. In this submission, we are requesting \$6,732,500 non-hour cost burden. This represents an adjustment increase of +\$5,865,000 and is due to the increase in submittals in § 250.732(a) and is also shown in the table below.

Citation 30 CFR 250 Subpart G and related NTL(s)	Reporting & Recordkeeping Requirement	Last renewal cycle	This renewal cycle	Changes between cycles	Reason
710(a)	Instruct crew members in safety requirements of operations - record dates and times of meetings, include potential hazards; make available to BSEE.	7,512 meetings	18,000 meetings	+10,488 meetings	Change in agency estimate
		5,634 hours	13,500 hours	+7,866 hours	
710(b); 738(p)	Prepare a well-control drill plan for each well, including but not limited to instructions re components of BOP, procedures, crew assignments, established times to complete assignments, etc. Keep/post a copy of the plan on the rig at all times; post on rig floor/bulletin board.	308 plans	1,528 plans	+1,220 plans	Change in agency estimate
		154 hours	764 hours	+610 hours	
711(b), (c)	Record in the daily report: time, date, and type of drill conducted; time re diverter or BOP components; total time for entire drill.	8,320 drills 8,320 hours	2,571 drills 2,571 hours	-5,749 drills -5,749 hours	Change in agency estimate

Citation 30 CFR 250 Subpart G and related NTL(s)	Reporting & Recordkeeping Requirement	Last renewal cycle	This renewal cycle	Changes between cycles	Reason
712(a), (b), (f)	Notify BSEE of all rig movements on or off locations.	20 notices 2 hours	50 notices 13 hours	+30 notices +11 hours	Change in agency estimate
	Rig movements reported on Rig Movement Notification Report (Form BSEE-0144). Including MODUs, platform rigs; snubbing units, lift boats, wire-line units, and coiled tubing units 24 hours prior to movement; if the initial date changes by more than 24 hours, submit updated BSEE-0144.	151 forms 30 hours	170 forms 43 hours	+19 forms +13 hours	
		832 updates 166 hours	1,700 updates 425 hours	+868 updates +259 hours	
713(a), (b)	Collect and report additional information for Fitness/Foundation requirements if sufficient information is not available.	466 responses 2,330 hours	900 responses 4,500 hours	+434 responses +2,170 hours	Change in agency estimate
715	GPS for MODUs 1 – Notify BSEE with tracking/locator data access and supporting information; notify BSEE Hurricane Response Team as soon as operator is aware a rig has moved off location.	1 notification 1 hour	5 notifications 5 hours	+4 notifications +4 hours	Change in agency estimate
720(a)(3)	Request and receive DM approval before resuming operations.	25 requests 13 hours	35 requests 18 hours	+10 requests +5 hours	Change in agency estimate
721(d), (f), (g)	Submit to the District Manager for approval plans to re-cement, repair, or run additional casing/liner, include PE certification of proposed plans.	88 requests 44 hours	10 requests 5 hours	-78 requests -39 hours	Change in agency estimate
721(g)(5)	Document all your test results; make available to BSEE upon request.	1,340 results 1,005 hours	150 results 113 hours	-1,190 results -892 hours	Change in agency estimate
721(g)(6)	Notify District Manager immediately of indication of failed negative pressure test; submit description of corrective action taken; receive approval to retest.	14 notifications 14 hours	10 notifications 10 hours	-4 notifications -4 hours	Change in agency estimate
722	Caliper, pressure test, or evaluate casing; submit evaluation results report including calculations; obtain approval	247 reports 741 hours	30 reports 90 hours	-217 reports -651 hours	Change in agency

Citation 30 CFR 250 Subpart G and related NTL(s)	Reporting & Recordkeeping Requirement	Last renewal cycle	This renewal cycle	Changes between cycles	Reason
	before repairing or installing additional casing; PE Certification; or resuming operations (every 30 days during prolonged drilling).				estimate
722	Document successful pressure test in the Well Activity Report (WAR)	300 reports 150 hours	25 reports 13 hours	-275 reports -137 hours	Change in agency estimate
722(b)(3)	Perform a pressure test after repairs made/casing installed and report results.	300 reports 300 hours	5 reports 5 hours	-295 reports -295 hours	Change in agency estimate
723(d)	Request exceptions prior to moving rig(s) or related equipment.	845 requests 1,268 hours	20 requests 30 hours	-825 requests -1,238 hours	Change in agency estimate
724(c)	Develop and implement a RTM plan that includes all required data of this section; make available to BSEE upon request.	130 plans 650 hours	20 plans 100 hours	-110 plans -550 hours	Change in agency estimate
730(a)(4)	Maintain current set of approved schematic drawings on rig and onshore location; obtain approval to resume operations if modified/changed.	10 requests 240 hours	15 requests 360 hours	+5 requests +120 hours	Change in agency estimate
730(c)(1)	Provide written notice within 30 days of discovery/identification of equipment failure.	30 notices 60 hours	40 notices 80 hours	+10 notices +20 hours	Change in agency estimate
730(c)(2)	Provide BSEE and manufacturer a copy of analysis report re equipment failure.	30 reports 150 hours	40 reports 200 hours	+10 reports +50 hours	Change in agency estimate
730(c)(2)	Submit an extension request to the Chief, OORP, detailing how the investigation and analysis will get completed to BSEE for approval.	5 requests 5 hours	10 requests 10 hours	+5 requests +5 hours	Change in agency estimate
732(a)	Submit ITP verification and all supporting documentation related to this section (such as, but not limited to shearing testing, pressure integrity testing, calculations, etc.).	150 verifications 1,500 hours \$765,000	1,300 verifications 13,000 hours \$6,630,000	+1,150 verifications +11,500 hours +\$5,865,000	Change in agency estimate
732(d)	Make all documentation that demonstrates compliance with the requirements of this section available to BSEE upon request.	160 submittals 40 hours	10 submittals 3 hours	-150 submittals -37 hours	Change in agency estimate

Citation 30 CFR 250 Subpart G and related NTL(s)	Reporting & Recordkeeping Requirement	Last renewal cycle	This renewal cycle	Changes between cycles	Reason
734(a)(7)	Demonstrate acoustic control system will function properly in environment and conditions; submit any additional information requested.	10 submittals  10 hours	100 submittals  100 hours	+90 submittals  +90 hours	Change in agency estimate
734(a)(9); 738(n)	Label all functions on all panels.	33 panels  50 hours	60 panels  90 hours	+27 panels  +40 hours	Change in agency estimate
737(a)(4) (d)(10)	Obtain approval for a 21-day BOP testing frequency, develop a BOP health monitoring plan (including, but not limited to, information/requirements such as condition monitoring tool; failure propagation analysis; a failure tracking and resolution system that includes detailed failure reports and identification of recurring problems).	25 requests  75 hours	12 requests  36 hours	-13 requests  -39 hours	Change in agency estimate
	Submit quarterly reports of the data collected with the health monitoring plan to the Regional Supervisor, District Field Operations.	100 reports  100 hours	48 reports  48 hours	-52 reports  -52 hours	
737(c); 746(a), (b), (c), (d)	Record time, date, and results of all pressure tests, actuations, and inspections of the BOP system, its components, and marine riser in the daily report; onsite rep certify and sign/date reports, etc.; document sequential order of BOP, closing times, auxiliary testing, pressure, and duration of each test.	4,457 results  34,542 hours	13,300 results  103,075 hours	+8,843 results  +68,533 hours	Change in agency estimate
737(d)(2), (d)(3), (d) (4)	Notify District Manager 72 hours prior to testing; if BSEE unable to witness test, provide results to BSEE within 72 hours after completion; document all ROV test results; make available to BSEE upon request.	186 notifications  47 hours	430 notifications  108 hours	+244 notifications  +61 hours	Change in agency estimate
		1,239 results	1 result	-1,238 results	
		6,815 hours	6 hours	-6,809 hours	
737(d)(12)	Document all autoshear, EDS, and deadman test results; make available to BSEE upon request.	2,520 submittals  1,260 hours	140 submittals  70 hours	-2,380 submittals  -1,190 hours	Change in agency estimate
		120 responses	10 responses	-110 responses	
		120 hours	10 hours	-110 hours	

Citation 30 CFR 250 Subpart G and related NTL(s)	Reporting & Recordkeeping Requirement	Last renewal cycle	This renewal cycle	Changes between cycles	Reason
737(e)	Provide 72-hour advance notice of location of shearing ram tests or inspections.	136 notices 34 hours	15 notices 4 hours	-121 notices -30 hours	Change in agency estimate
738; 746(e)	Requires District Manager Approval: (a), (d); 746(e) Report problems, issues, leaks (b) Put well in a safe condition (b) Prior to resuming operations for new/repared/reconfigured BOP (g) Your well control places demand above its rating pressure (j) Two barriers in place prior to BOP removal	25 requests 13 hours	10 requests 5 hours	-15 requests -8 hours	Change in agency estimate
		No changes			
		No changes			
		200 requests 50 hours	50 requests 13 hours	-150 requests -37 hours	
		No changes			
		1 request 1 hour	5 requests 5 hours	+4 requests +4 hours	
738(i)	Submit an ITP report/verification that BOP is fit for service.	50 submittals 25 hours	5 submittals 3 hours	-45 submittals -25 hours	Change in agency estimate
738(f)	Notify District Manager of BOP configuration changes.	15 submittals 8 hours	5 submittals 3 hours	-10 submittals -5 hours	Change in agency estimate
738(m)	Request approval to utilize any other well-control equipment; include ITP report re-equipment design and suitability; any other documentation/information required by District Manager (ITP Action).	10 requests 20 hours	40 requests 80 hours	+30 requests +60 hours	Change in agency estimate
739(b)	An ITP report documenting inspection, including problems and how corrected; make reports available to BSEE upon request.	21 reports 105 hours	40 reports 200 hours	+19 reports +95 hours	Change in agency estimate
740; 711(b); 724(b); 738(c); 745; 746	Maintain daily report/records onsite during operations include, but not limited to, date, time, type of drill, test results; any information required by the District Manager.	312 reports 130 hours	18,000 reports 9,000 hours	+17,688 reports +8,870 hours	Change in agency estimate
740; 741; 724(b)	Retain drilling records for 90 days after drilling complete; retain casing/liner pressure, diverter, BOP tests, real-time monitoring data for 2 years after completion; any other information	3,460 reports 7,439 hours	40 reports 86 hours	-3,420 reports -7,353 hours	Change in agency estimate

Citation 30 CFR 250 Subpart G and related NTL(s)	Reporting & Recordkeeping Requirement	Last renewal cycle	This renewal cycle	Changes between cycles	Reason
	requested by the District Manager.	120 reports  60 hours	18,000 reports  9,000 hours	+17,880 reports  +8,940 hours	
742; NTL	Submit copies of logs/charts of electrical, radioactive, sonic, or other well logging operations.	281 reports  843 hours	40 reports  120 hours	-241 reports  -723 hours	Change in agency estimate
	Submit copies of directional and vertical-well surveys.	281 reports  281 hours	18,000 reports  18,000 hours	+17,719 reports  +17,719 hours	
	Submit copies of velocity profiles and surveys.	55 reports  55 hours	40 reports  40 hours	-15 reports  -15 hours	
	Record and submit core analyses.	150 reports  150 hours	18,000 reports  18,000 hours	+17,850 reports  +17,850 hours	
745; NTL	Submit copies of well records; paleontological interpretations; service company reports; and other reports or records of operations to BSEE as requested.	308 reports  462 hours	40 reports  60 hours	-268 reports  -402 hours	Change in agency estimate
746	Record the time, date, and results of all casing and liner presser tests.	4,160 reports  8,320 hours	18,000 reports  36,000 hours	+13,840 reports  +27,680 hours	Change in agency estimate
746(f)	Retain all records pertaining to pressure tests, actuations, and inspections in daily report etc.; retain all records listed in this section on the rig unit for the duration of operation; after completion, retain all records listed in this section for 2 years on rig unit and at the lessee's field office conveniently available to BSEE; make all the records available upon request.	1,563 reports  2,345 hours	40 reports  60 hours	-1,523 reports  -2,285 hours	Change in agency estimate
751	Record test pressures during BOP and coiled tubing tests on a pressure chart or with a digital recorder; certify the information is correct.	1,320 reports  3,630 hours	18,000 reports  49,500 hours	+16,680 reports  +45,870 hours	Change in agency estimate
<b>Total</b>				<b>+189,773 Hour Burden</b>	



Citation 30 CFR 250 Subpart G and related NTL(s)	Reporting & Recordkeeping Requirement	Last renewal cycle	This renewal cycle	Changes between cycles	Reason

**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.**

BSEE 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.**

BSEE 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 Submission.”**

We are not making any exceptions to the “Certification for Paperwork Reduction Act Submissions.”