

About the UIC ICR Spreadsheet

Basic rule: update the inventory and labor rates pages, and much of the remaining pages will be a

Summary of worksheets in this file

Most of the updates will be to the yellow tabs: inventory, labor rates, and class-specific assumptions. **Assumpt**
tab (below the table); all are automated.

The summary tabs (purple) are the “analysis” of the numbers. These contain the ICR tables and explain what o

The operator and state burden/cost tables (blue tabs) are the detailed tables for Appendix A (from old operator

The ICRAS forms tab (green) has information to complete OEI's ICR submission spreadsheet (new in 2018); ICR
prior ICR numbers. [This sheet was used to populate the ICRAS/ROCIS site (which is no longer used, but retained

Fed tables (green tab) aren't printed in the ICR anymore; these do feed the summary tables. **DO NOT EDIT** un

Burden estimates

The burden estimates for individual activities are based on consultations. They usually do not change, unless a

Labor costs

Update the colored cells in the labor rates page.

Operator labor costs are based on BLS data, updated with each ICR (Different labor rates apply to Class 1/2/3,

The labor rates sheet shows the industries used as inputs, and calculations of average values for these industr

Contractor rates are here too **(They are non-labor costs, per the ICR Handbook, and are inflated per C**

See the yellow box (cell O1) on the labor rates page.

State and Federal labor rate is GS-9, Step 10 on current year's Federal pay schedule; multiplied by 1.6 to load.

Non-labor costs

These are based on consultations.

These are **inflated from 1995 dollars to current year dollars**. (From BLS web site CPI calculator.)

For Class VI, these are inflated from \$2008 (the Class VI ICR). Need to update the inflation factor between \$200

The inflation factor (INFL) from CPI calculator is cell F3 on the labor rates sheet.

Contractor costs are incl. as non-labor costs, and inflated per CPI. These are based on consultations about wha
contractor labor rate.

Number of respondents/responses

UPDATING THE INVENTORY PAGE IS THE MOST CRUCIAL STEP!!!

Inventory numbers drive many of the values for these; inventory is based on the most recent UIC online datab

The C1Assumptions, etc. pages reference/link to these values, and are inputs to the Class-specific burden and

The values of many of the assumptions are dependent on the inventory sheet.

Assumptions about the numbers of permit applications, well closures, etc. reflect year-to-year inventory chang

Class IV and Class V respondents also drive from measures data about progress on surveying and addressing h

Update assumptions about Class VI permit applications and wells operating separately-see Class VI assumption

Burden and cost sheets

The activities listed are per the CFR.

Legal, managerial, technical and clerical unit burdens for various activities are based on consultations.

Unit burdens are then multiplied by the respective labor rates (in labor rates sheet), and summed for a unit labor

Respondents and responses are based on consultations and drive heavily off of assumptions sheets.

Class-specific assumptions

These are on the yellow tabs and the state oversight tab.

They generally will not change, unless new information becomes available during consultations.

The yellow cells on these pages will change automatically as the inventory changes.

A **few peach (in 2018)/green in 2021 cells** on the assumptions sheets need to be checked/manually updated.

Calculating change in burden

The "Resp summary," "Change," "By activity," and "ICRAS" sheets calculate change from the approved ICR.

numbers.**

See **aqua shaded cells** in Resp summary, Change, By activity, Inventory, Labor rates, ICRAS calcs, C1, C2, C3
based on inventory differences so after this step, change will not be zero

Some of the class specific pages have scratch calculations under the tables. Most are specific to the current ICR.

For ICRAS/the OEI ICR submission spreadsheet, update the previous year's numbers in the shaded cells; everything is automated.

rack completion of this step.

State	CI 1 status	CLASS 1 HW	CLASS 1 OTHER	C1Haz in prim	Class I NH In prim	CI 2 status	CLASS 2 WELLS	C2 in prim	C2 in DI
Total		138	747	126	607		159,269	155,791	3,478
Connecticut	Prim			0	0	Prim		0	
Maine	Prim			0	0	Prim		0	
Massachusetts	Prim			0	0	Prim		0	
New Hampshire	Prim			0	0	Prim		0	
Rhode Island	Prim			0	0	Prim		0	
Vermont	Prim			0	0	Prim		0	
New Jersey	Prim	0	0	0	0	Prim		0	
New York	DI			0	0	DI	326	0	
Puerto Rico	Prim			0	0	Prim		0	
Virgin Islands	DI			0	0	DI		0	
DC	DI	0	0	0	0	DI		0	
Delaware	Prim			0	0	Prim		0	
Maryland	Prim			0	0	Prim		0	
Pennsylvania	DI	0	0	0	0	DI	1,645	0	
Virginia	DI	0	0	0	0	DI	13	0	
West Virginia	Prim	0	0	0	0	Prim	715	715	
Alabama	Prim	0	0	0	0	Prim	251	251	
Florida	Prim	0	305	0	305	DI	70	0	
Georgia	Prim	0	0	0	0	Prim		0	
Kentucky	DI		1	0	0	Prim	3,128	3,128	
Mississippi	Prim	5	9	5	9	Prim	1,321	1,321	
North Carolina	Prim			0	0	Prim		0	
South Carolina	Prim	0	0	0	0	Prim		0	
Tennessee	Prim	0	0	0	0	Prim	34	34	
Illinois	Prim	2	5	2	5	Prim	7,958	7,958	
Indiana	DI	4	13	0	0	Prim	1,161	1,161	
Michigan	DI	7	35	0	0	DI	1,420	0	
Minnesota	DI			0	0	DI		0	
Ohio	Prim	12	5	12	5	Prim	2,336	2,336	
Wisconsin	Prim			0	0	Prim		0	
Arkansas	Prim	4	7	4	7	Prim	1,023	1,023	
Louisiana	Prim	19	15	19	15	Prim	3,531	3,531	
New Mexico	Prim		6	0	6	Prim	4,175	4,175	
Oklahoma	Prim	0	6	0	6	Prim	11,000	11,000	
Texas	Prim	77	90	77	90	Prim	54,151	54,151	
Iowa	DI	0	0	0	0	DI	4	0	
Kansas	Prim	7	56	7	56	Prim	16,539	16,539	
Missouri	Prim	0	0	0	0	Prim	434	434	
Nebraska	Prim	0	11	0	11	Prim	620	620	
Colorado	DI		13	0	0	Prim	977	977	
Montana	DI			0	0	Prim	1,143	1,143	
North Dakota	Prim		8	0	8	Prim	1,454	1,454	
South Dakota	DI			0	0	Prim	108	108	
Utah	Prim	0	0	0	0	Prim	776	776	
Wyoming	Prim	0	84	0	84	Prim	4,989	4,989	
Amer Samoa	DI			0	0	DI		0	
Arizona	DI			0	0	DI		0	
California	DI	1	58	0	0	Prim	35,841	35,841	
Ft. Peck	DI			0	0	Prim	32	32	
Guam	Prim			0	0	Prim		0	
Hawaii	DI			0	0	DI		0	
MP	Prim			0	0	Prim		0	
Navajo	DI			0	0	Prim	475	475	
Nevada	Prim			0	0	Prim	17	17	

Alaska	DI		20	0	0	Prim	1,592	1,592
Idaho	Prim	0	0	0	0	Prim		0
Oregon	Prim	0	0	0	0	Prim	9	9
Washington	Prim	0	0	0	0	Prim	1	1
Total Primacy		38					46	
Total DI		20					12	180,199

Source: FY20 UIC Inventory, provided by Dan Feuer June 3, 2021

Last ICR Inventory (paste these to row 2 to calculate impact on change)

State	CI 1 status	CLASS 1 HW	CLASS 1 OTHER	C1Haz in prim	Class I NH In prim	CI 2 status	CLASS 2 WELLS	C2 in prim	C2 in DI
Total		140	688	129	557		180,199	176,486	3,713

Inventory	Total Class 1	Class 2	Class 3	Class 5	Class 3 sites		
Total - 2018 ICR	701,213	828	180,199	24,669	495,517	225	Source: UIC Inventory, FY 2016
Total - 2021 ICR	753,544	885	159,269	22,612	570,778	300	Source: UIC Inventory, FY 2020; NOTE: a few
Change	52,331	57	-20,930	-2,057	75,261	75	
Percent change	7%	7%	-12%	-8%	15%	33%	
Years between invent	3				25,087		

Updating the inventory

- Use final UIC inventory numbers
- Check order (e.g., MA and ME flip)
- Combine rows if multiple agencies report
- Add up Class II subtypes
- Paste values into shaded columns

Inventory sheet	notes
California	Class II - big drop; similar to 2019; big Class II
Ohio	Class II, III data missing in 2020; use 2019.
New York	2020 data missing; used 2018
Arizona	2020 data missing; used 2018. Big Class III ju
Delaware	2020 data missing; used 2019
Virgin Islands	2020 data missing; used 2019
Class V	INCOMPLETE. Dan F. provided updated total

CI 3 status	CLASS 3 SITES	CLASS 3 WELLS	C3 sites in prim	C3 wells in prim	CI 5 status	CLASS 5 WELLS	C5 in prim	Agency 1
	300	22,612	252	20,299		570,778	400,326	Total # prim
Prim			0	0	Prim	808	808	Connecticut
Prim			0	0	Prim	2,223	2,223	Maine Depa
Prim			0	0	Prim	2,599	2,599	Massachuse
Prim			0	0	Prim	12,131	12,131	New Hamps
Prim			0	0	Prim	1,925	1,925	Rhode Islan
Prim			0	0	Prim	1,833	1,833	Vermont De
Prim	0	0	0	0	Prim	411	411	New Jersey
DI	6	158	0	0	DI	8,681	0	
Prim			0	0	Prim	3,090	3,090	Puerto Rico
DI			0	0	DI	67	0	
DI	0	0	0	0	DI	236	0	
Prim			0	0	Prim	1,700	1,700	Delaware D
Prim			0	0	Prim	13,483	13,483	Maryland De
DI	0	0	0	0	DI	16,165	0	
DI	1	17	0	0	DI	12,282	0	
Prim	2	21	2	21	Prim	2,189	2,189	West Virgini
Prim	1	4	1	4	Prim	1,126	1,126	Alabama De
Prim	0	0	0	0	Prim	18,325	18,325	Florida Dep
Prim	0	0	0	0	Prim	17,300	17,300	Georgia Dep
DI			0	0	DI	14,388	0	Kentucky De
Prim			0	0	Prim	7,500	7,500	Mississippi
Prim			0	0	Prim	15,100	15,100	North Caroli
Prim	0	0	0	0	Prim	19,302	19,302	South Carol
Prim	0	0	0	0	Prim	5,086	5,086	Tennessee I
Prim			0	0	Prim	33,915	33,915	Illinois Dep
DI			0	0	DI	17,372	0	Indiana Dep
DI	5	58	0	0	DI	8,419	0	
DI			0	0	DI	3,688	0	
Prim	5	56	5	56	Prim	23,432	23,432	Ohio Depart
Prim			0	0	Prim	1,869	1,869	Wisconsin C
Prim			0	0	Prim	167	167	Arkansas D
Prim	19	82	19	82	Prim	990	990	Louisiana D
Prim	9	9	9	9	Prim	2,364	2,364	New Mexico
Prim	0	0	0	0	Prim	2,820	2,820	Oklahoma C
Prim	200	4,528	200	4,528	Prim	56,625	56,625	Texas Comr
DI	0	0	0	0	DI	5,358	0	
Prim	4	163	4	163	Prim	9,114	9,114	Kansas Dep
Prim	0	0	0	0	Prim	10,934	10,934	Missouri De
Prim	3	4,769	3	4,769	Prim	1,597	1,597	Nebraska D
DI	17	17	0	0	DI	2,911	0	Colorado Oi
DI			0	0	DI	7,043	0	Montana Bo
Prim			0	0	Prim	933	933	North Dakot
DI	14	14	0	0	DI	713	0	South Dakot
Prim	3	27	3	27	Prim	4,430	4,430	Utah Depart
Prim	6	10,640	6	10,640	Prim	1,340	1,340	Wyoming De
DI			0	0	DI	10	0	
DI	3	1,413	0	0	DI	40,743	0	
DI	2	636	0	0	DI	23,121	0	California D
DI			0	0	DI	3	0	Fort Peck T
Prim			0	0	Prim	516	516	Guam Envir
DI			0	0	DI	6,973	0	
Prim			0	0	Prim	25	25	Commonwe
DI			0	0	DI	218	0	Navajo Nati
Prim			0	0	Prim	2,371	2,371	Nevada Divi

DI			0	0	DI	2,061	0
Prim	0	0	0	0	Prim	20,285	20,285
Prim	0	0	0	0	Prim	40,546	40,546
Prim	0	0	0	0	Prim	59,922	59,922
<hr/>					<hr/>		
	38				38		
	20				20		

Alaska Oil a
Idaho Depar
Oregon Dep
Washington

Cl 3 status	CLASS 3 SITES	CLASS 3 WELLS	C3 sites in prim	C3 wells in prim	Cl 5 status	CLASS 5 WELLS	C5 in prim
	225	24,669	175	24,243		495,517	347,224

Number of
Class1
Class2

Class3
Class4
Class5
Class6

**This is use

/ states (CA, OH, NY, AZ, DE, VI) were missing 2020 data so 2019 or 2018 data used; see below

ll jump

mp

in Oct 2021; see Class V assumptions

Agency 2

i. agencies: 59 Per Jill, and Anita memo

Department of Environmental Protection.
Department of Environmental Protection
Department of Environmental Protection
Department of Environmental Services
Department of Environmental Management
Department of Environmental Conservation
Dept. of Environmental Protection

Environmental Quality Board of Water Quality

Department of Natural Resources and Environmental Control
Department of the Environment

Division of Environmental Protection
Alabama Oil & Gas, State Board
Department of Environmental Protection
Department of Natural Resources
Department of Natural Resources
Mississippi Department of Environmental Quality
Alabama Department of Environmental Quality
Alabama Department of Health and Environmental Control
Department of Environment and Conservation
Illinois Environmental Agency
Department of Natural Resources/Oil and Gas Division

Ohio Environmental Agency
Department of Natural Resources
Arkansas Oil and Gas Commission
Department of Natural Resources
New Mexico Environment Department
Oklahoma Department of Environmental Quality
Texas Railroad Commission

Kansas Corporation Commission-Conservation Division
Department of Natural Resources
Nebraska Oil and Gas Conservation Commission
Oil and Gas Conservation Commission
Board of Oil and Gas Conservation
North Dakota Industrial Commission - Oil and Gas Division
North Dakota Department of Environmental and Natural Resources
Utah Department of Natural Resources
Wyoming Oil and Gas Conservation Commission

Department of Conservation; CalGEM
Agencies
Environmental Protection Agency

Department of Northern Mariana Islands, Division of Environmental Quality
Environmental Protection Agency
Division of Environmental Protection

and Gas Conservation Commission
Department of Water Resources
Department of Environmental Quality
Department of Ecology

DI Programs, by Class:

- 8 All regions but 1 and 6 have at least 1 DI state
- 6 All regions but 1, 6, 8 and 10 have at least 1 DI state

- 8 All regions but 1 and 6 have at least 1 DI state
- 8 All regions but 1 and 6 have at least 1 DI state
- 8 All regions but 1 and 6 have at least 1 DI state

- 1 Region 5 as of Jan 2018

and for the well-by-well exhibits; however 10 regions have oversight duties/report to Headquarters

Labor rates used in UIC Program ICR

	Class 1, 2, 3	Class 4/5		
Legal	\$ 96	\$ 29		
Managerial	\$ 97	\$ 61		
Technical	\$ 56	\$ 30		
Clerical	\$ 33	\$ 25		
State/federal	\$ 46	\$ 46		
Contractor	\$ 60	inflated to:	\$	102
Class 6				
Tech 1 - Mining & Geological Engineer		\$		106
Tech 2 - Geoscientist		\$		118

INFLATION FACTOR:
1.6982

From BLS web site: CPI calculator
100 1995 dollars
169.82 2020 dollars

Inflating Class VI non-labor costs (relative to
100 2008 dollars (Class VI non-lab)
120.21 2020 dollars

Class 1-3: Based on Bureau of Labor Statistics Occupational Employment Statistics, 2016, for NAICS codes 325000 (Chemical Manufacture), 324000 (Petroleum and Coal Products), and 211000 (Oil and Gas Extraction).
Class 4 and 5: Based on BLS Occupational Employment Statistics, 2016, for NAICS codes 447000 (Gasoline Stations) and 441000 (Motor Vehicle and Parts Dealers).
Class 6: Based on BLS Occupational Employment Statistics, 2016, for NAICS codes 21100 (Oil and Gas Extraction), increased by 60 per cent.

<http://www.bls.gov/oes/current/oesrci.htm>

State/federal: GS-9, Step 10 on Federal pay schedule; multiplied by 1.6 to load.

State/Agency
GS-9, Step 10 Fed pay scale **\$ 28.70** \$ **45.92** 2021 fed pay scale (accessed 9/30/21)

Class 1, 2, 3

NAICS	NAICS_TITLE	OCC_CODE	OCC_TITLE	ICR labor cat	H_MEDIAN		
211000	Oil and Gas Extrac	43-0000	Office and administrati	C	\$ 21.96		
324000	Petroleum and C	43-0000	Office and administrati	C	\$ 21.98		
325000	Chemical Manufa	43-0000	Office and administrati	C	\$ 21.16		
326000	Plastics and Rub	43-0000	Office and administrati	C	\$ 19.24		
327000	Nonmetallic Mine	43-0000	Office and administrati	C	\$ 18.82		
331000	Primary Metal Ma	43-0000	Office and administrati	C	\$ 20.21	\$ 20.56	Clerical average
325000	Chemical Manufa	23-0000	Legal occupations	L	\$ 60.02	\$ 60.02	Legal average
211000	Oil and Gas Extrac	11-0000	Management occupatio	M	\$ 69.83		
324000	Petroleum and C	11-0000	Management occupatio	M	\$ 64.16		
325000	Chemical Manufa	11-0000	Management occupatio	M	\$ 64.40		
326000	Plastics and Rub	11-0000	Management occupatio	M	\$ 54.39		
327000	Nonmetallic Mine	11-0000	Management occupatio	M	\$ 55.74		
331000	Primary Metal Ma	11-0000	Management occupatio	M	\$ 55.74	\$ 60.71	Managerial average
211000	Oil and Gas Extrac	17-2041	Chemical engineers	T	\$ 66.95		
211000	Oil and Gas Extrac	19-4031	Chemical technicians	T	\$ 32.81		
324000	Petroleum and C	17-2041	Chemical engineers	T	\$ 59.31		
324000	Petroleum and C	19-4031	Chemical technicians	T	\$ 32.65		
324000	Petroleum and C	51-8091	Chemical plant and sys	T	\$ 36.65		
324000	Petroleum and C	51-9011	Chemical equipment op	T	\$ 35.86		
325000	Chemical Manufa	17-2041	Chemical engineers	T	\$ 52.83		
325000	Chemical Manufa	19-4031	Chemical technicians	T	\$ 25.48		
325000	Chemical Manufa	51-8091	Chemical plant and sys	T	\$ 30.96		
325000	Chemical Manufa	51-9011	Chemical equipment op	T	\$ 24.40		
326000	Plastics and Rub	17-2041	Chemical engineers	T	\$ 49.91		
326000	Plastics and Rub	19-4031	Chemical technicians	T	\$ 22.47		
326000	Plastics and Rub	51-9011	Chemical equipment op	T	\$ 21.53		
327000	Nonmetallic Mine	17-2041	Chemical engineers	T	\$ 43.00		
327000	Nonmetallic Mine	19-4031	Chemical technicians	T	\$ 25.07		
327000	Nonmetallic Mine	51-9011	Chemical equipment op	T	\$ 22.85		
331000	Primary Metal Ma	17-2041	Chemical engineers	T	\$ 43.00		
331000	Primary Metal Ma	19-4031	Chemical technicians	T	\$ 25.07		
331000	Primary Metal Ma	51-8091	Chemical plant and sys	T	\$ 27.28		
331000	Primary Metal Ma	51-9011	Chemical equipment op	T	\$ 22.85	\$ 35.05	Technical average

Class 4 & 5

NAICS	NAICS_TITLE	OCC_CODE	OCC_TITLE	ICR labor cat	H_MEDIAN	
441000	Motor Vehicle an	43-0000	Office and administrati	C	\$ 16.36	
447000	Gasoline Stations	43-0000	Office and administrati	C	\$ 14.75	\$ 15.56 Clerical averag
441000	Motor Vehicle an	11-0000	Management occupatic	M	\$ 49.69	
447000	Gasoline Stations	11-0000	Management occupatic	M	\$ 26.54	\$ 38.12 Managerial ave
441000	Motor Vehicle an	49-0000	Installation, maintenanc	T	\$ 20.00	
447000	Gasoline Stations	49-0000	Installation, maintenanc	T	\$ 17.41	\$ 18.71 Technical aver
441000	Motor Vehicle an	23-0000	Legal Occupations	L	\$ 18.03	\$ 18.03 Legal average

Some numbers are hard coded based on consultations; do not change unless this is recommended in consultation process
 Yellow cells will automatically change each ICR based on inventory. Get application data from 7520-1 data.

Class I start u
 HAZARDOUS

Class I Inputs for Operator Burden Input

Input	Number	Var	
Total Hazardous facilities	73		HAZ
Total Nonhazardous facilities	393		NHAZ
New Permit applications - Hazardous	36		NPH
New Permit applications - Nonhazardous	73		NPN
Applications for new wells at new facilities	30%		NPER
Applications for new wells at existing facilities	70%		EPER
Hazardous Renewal Permit applications	12		RPH
Nonhazardous Renewal Permit applications	20		RPN
Hazardous Plugging & Abandonments	1		HPA
Nonhazardous Plugging & Abandonments	1		NPA
Wells Per Facility	1.9		WPF
Percent of facilities in Primacy states	83%		PRIM1
Percent of facilities in DI Programs	17%		Diclass1
Total wells	885		
No. of hazardous wells	138		
No. of nonhazardous wells	747		
Florida facilities affected by rule	0		
Florida facilities (municipal owners)	15		
Petition modifications	6		PETMOD
Permit Modifications	8		
Permit Modifications - Hazardous	3		HMOD
Permit Modifications - Nonhazardous	5		NMOD
Percent of wells worked over	5%		WORK
Percent of facilities that are commercial	5%		COMM
Legal Labor Rate	\$ 96.03		LEG1
Management Labor Rate	\$ 97.14		MAN1
Technical Labor Rate	\$ 56.07		TECH1
Clerical Labor Rate	\$ 32.90		CLER1
State Labor rate	\$ 45.92		Staterate
Class I permit applications requiring aquifer	17%		

Notes

No. of wells/wells per facility
 No. of wells/wells per facility
 Average of 7520-1 data (2017-2020 - see at right); assume 1/3 of all Class I
 Average of 7520-1 data (2017-2020); assume 2/3 are NHaz. CHANGED SOURCE
 Calls, meeting
 Calls, meeting
 Inventory, calls (see below)
 Inventory, calls (see below)
 EPA Inventory -- assumed even split
 EPA Inventory -- assumed even split
 EPA Inventory, confirmed by calls
 EPA Inventory (calculated)
 EPA Inventory (calculated)
 EPA Inventory
 EPA Inventory
 EPA Inventory
 Florida Rule ICR (was 16 in 2007; assu
 Per Nancy Marsh (3/25/11)
 Regions 5, 6
 Average of 7520-1 data (2017-2020). CHANGED ASSUMPTION IN 2021
 37% of modifications
 63% of modifications
 Estimate
 Class I Database
 Updated rates per BLS (links to labor rates sheet)
 Updated rates per BLS (links to labor rates sheet)
 Updated rates per BLS (links to labor rates sheet)
 Updated rates per BLS (links to labor rates sheet)
 GS-9, Step 10 on Federal pay schedule; multiplied by 1.6 to load.
 Based on aquifer exemptions tracking system data

Requirements a

146.70(a)
144.31(e)(9)
146.70(a)(2,3)
146.70(a)(4)
146.70(a)(5-7)
146.70(a)(9-11)
146.70(a)(13)
146.70(a)(14)
146.70(a)(15)
146.70(a)
146.70(d)
146.71(a)
146.72(a)(1)
Requirements f
144.31(g)(1)
144.31(g)(2)
144.31(g)(3)
146.68(a)(1)
148.20

NONHAZARD

Requirements a

146.14(a) (1, 4-
144.31(e)(9)
146.14(a)(2,3)
146.14(a)(4-6)
146.14(a)
146.14(a)(8-10)
146.14(a)(12)
146.14(a)(13)
146.14(a)(14)
146.14(a)(16)

	facilities	
permit apps (inventory)		54
percent new	40%	21.6
percent renewal	60%	32.4
percent haz	37%	
percent nonhaz	63%	
haz & new		8
nonhaz & new		14
Haz & renewal		12
nonhaz & renewal		20

ip costs - non labor estimates. The:

FACILITIES: (NONHAZ BELOW)

ssociated with permit ap (Average)	
Read permit application	\$0
Gather and submit	\$0
list of landowners	\$0
Prepare and submit a map	\$15,100
Prepare and submit AoR	\$585
Prepare and submit	\$31,350
Develop formation testing	\$4,500
Prepare and submit	\$175
Prepare and submit	\$2,950
Prepare and submit	\$7,475
Prepare and submit	\$3,750
Prepare and submit	\$4,550
Prepare and submit closure	\$1,105
Prepare and submit post-	\$1,360
or active hazardous waste facilities	
Gather and submit dates of	\$5,700
Gather and submit	\$2,850
Gather & submit site	\$66,500
Develop waste analysis	\$1,900
No-migration petition	\$525,000

OUS FACILITIES (HAZ AND NOTES A

ssociated with permit ap (Average)	
Read permit application	\$0
Gather and submit	\$0
In DI programs, gather and	\$0
Prepare and submit a map	\$12,080
Prepare and submit	\$31,350
Prepare and submit	\$3,750
Develop formation testing	\$4,500
Prepare and submit	\$175
Prepare and submit	\$2,950
Prepare and submit	\$5,750
Prepare and submit closure	\$1,105

Yellow cells will change automatically each ICR based on inventory. Get application data from 7520-1 data.

ASSUMPTION	VALUE	VAR NAME	NOTES
Total permit applications received	5,956	PAPPS	Based on average of 7520-1 data reported 2017-2019 (2020 data seemed unusually low); data are on Class I page. CHANGE
Wells per area permit issued (non-HF)	3.1		Assumption. Source: EPA data from FY 1995
Total wells constructed	5,658	NWELL	Apps * 0.95. Assume that about 95% of apps get a permit, per assumptions in 2018. CHANGED ASSUMPTION IN 2021
Permit modifications	773	MODS	Average of 7520-1 data (2017-2020). CHANGED ASSUMPTION IN 2021
% of new wells in DI states	2%	WDI	Assumption based on analysis of EPA inventory.
% of new wells in Primacy states	98%	WPRI	Assumption based on analysis of EPA inventory.
# of pluggings	1,044	PLUG	Assumption based on net change in inventory 1994-1995
II-R wells per lease	32	FACR	Assumption based on analysis of Texas data (from Class II RIA).
II-D wells per lease	1.9	FACD	Assumption based on analysis of Texas data (from Class II RIA).
Total wells per lease	33.9	FACA	Assumption based on analysis of Texas data (from Class II RIA).
Total leases	4,698	FAC	Calculated
total wells	159,269		From inventory. 1998 total = 160,970; 2001 = 146,878; 2004 = 141,129; 2010 = 150,851; 2014 = 176,516
% of wells for which operator performs	18.86%	AORO	Assumption based on consultations
% of wells for which state performs	22.23%	AORS	Assumption based on consultations
% of requiring AoR (not subject to variance or overl	41.1%	AORD	The Cadmus Group, Inc., Technical Issues Paper for Developing Area of Review Guidance (Draft), Contract No. 68-C4-0011, '
Wells per operator (except HF)	10	FACA2	Assumption based on consultations
Total operators	15,927	FAC2	Calculated
Legal labor rate	\$ 96.03	LEG	Updated rates per BLS (in labor rates sheet)
Management labor rate	\$ 97.14	MAN	Updated rates per BLS (in labor rates sheet)
Technical labor rate	\$ 56.07	TECH	Updated rates per BLS (in labor rates sheet)
Clerical labor rate	\$ 32.90	CLER	Updated rates per BLS (in labor rates sheet)
Contractor labor rate	\$ 59.91	CON	
Wells in DI states	3,478		
State Labor rate	\$ 45.92	STATE2	
Operators in Primacy	15,579		Calculated
Operators in DI	348		Calculated
Wells in Primacy states	155,791		
Percent in DI	2%		Assumption based on inventory
Class II permit applications requiring aquifer exempt	3%		Assumption based on aquifer exemptions tracking system data
New diesel HF wells subject to permitting activities	-		Zeroed out in 2018. Based on a 2014 EPA assessment of the number of disclosures to the FracFocus data base related to fra
HF facilities (for permitting)	-		Because the DFHF Guidance recommendations are "short term" it is assumed that, over the ICR clearance period, permitting ;
HF Facilities (for operating)	-		Assume all HF wells are in DI states

Class 3 Assumptions

Total new permit applications received	44	PAPPS3	Average of 7520-1 data (2017-2020). CHANGED ASS
% of applications for individual permits	40%	PIND	Assumption based on consultations
% of applications for area permits	60%	PAREA3	Assumption based on consultations
Total wells constructed	44	NWELL3	Same as apps (to avoid negative numbers where in
No. permit mods	1	PM	Average of 7520-1 data (2017-2020). CHANGED ASS
Plug/abandonments	2	PA	Assumption based on consultations
Inventory	22,612	INV	UIC inventory
Primacy	90%	PR	In 2001 this was 99%; was 30% in 2007; 48% in 201
DI	10%	Diclass3	Calculated
Facilities	300	FAC3	Calculated. This number (rather than well inventory)
Wells per facility	75	WFAC	Calculated
Uranium mining - 95%	21,481	URAN	Type -specific data no longer maintained; percent b
Salt mining - 4%	904	SALT	Type -specific data no longer maintained; percent b
Brine mining/other - 1%	226	OTH	Type -specific data no longer maintained; percent b
Uranium mining facilities	18	URFAC	Type -specific data no longer maintained; percent b
Salt solution mining facilities	82	SALFAC	Type -specific data no longer maintained; percent b
Other Class III facilities	199	OTHFAC	Type -specific data no longer maintained; percent b
Wells per uranium facility	1,174	WURFAC	Calculated
Wells per salt facility	11	WSAFAC	Calculated
Wells per other Class III facility	1	WOTHFAC	Calculated
Monitoring wells per facility	110	MONIT	Assumption based on consultations
Legal labor rate	\$ 96.03	LEG3	Updated rates per BLS (links from operator sheet)
Managerial labor rate	\$ 97.14	MAN3	Updated rates per BLS (links from operator sheet)
Technical labor rate	\$ 56.07	TECH3	Updated rates per BLS (links from operator sheet)
Clerical labor rate	\$ 32.90	CLER3	Updated rates per BLS (links from operator sheet)
Contractor labor rate	\$ 59.91	CON3	Updated rates per BLS (links from operator sheet)
State labor rate	\$ 45.92		
Class III permit applications requiring aqui	1%		Based on aquifer exemptions tracking system data

See the read me page about changing these values!!!

Update the shaded cells; all others reference other cells. Also add inventory information below

Class V Inputs

Input	Number	Var.	Notes
New wells on inventory	19,348	NEWINV	Increase in inventory since 2001 to normalize for increase/decrease year
Permit applications submitted	10		EPA estimate, all in primacy states (added in 2018); the 7520-1 data inc
Legal labor rate	\$ 28.85	LEG	From labor rates sheet
Management labor rate	\$ 60.98	MAN	From labor rates sheet
Technical labor rate	\$ 29.93	TECH	From labor rates sheet
Clerical labor rate	\$ 24.89	CLER	From labor rates sheet
Cesspools closing	-		These closures are accounted for on the Class IV/endangering Class V pa
MVWDWS closing	-		These closures are accounted for on the Class IV/endangering Class V pa
MVWDWS getting a permit	-		Assumed to be zero beginning in 2018
MVWDWS monitoring	1,479		Frozen as of the 2015 ICR, beginning 2018
Percent in Primacy states	70%		Based on inventory
State labor rate	\$ 45.92		From labor rate sheet
Percent submitting 7520-16 electronic	70%		Per Colin 10/14/21 - use this to est a total burden savings and percent re

Comparing the Class V inventory over the years provides an estimate of the number of inventory submittals to review

Note: as of 2013, the Class V numbers on the inventory are no longer "frozen."

	Number	Change from prior inventory	
Inventory 2001	206,379		
Inventory 2006	402,020	195,641	
Inventory 2007	424,098	22,078	
Inventory 2008	456,990	32,892	
Inventory 2009	495,032	38,042	
Inventory 2010	511,184	16,152	19,348 Average increase 2001-current year
Inventory 2012	486,511	-24,673	Add newer inventory data; update this formu
Inventory 2013	480,921	-5,590	

r to year (see b
ludes 1000s of

age (beginning
age (beginning

porting electr

From last ICR (
19,276

ila to count row

See the read me page about changing these values!!!

Update shaded cells each ICR

Note: the ICR unit burdens assume that operators (not contractors) perform most activities – this conservatively over-estimates burden. Consider reaching out to early permittees for reality check on this as

Class VI Inputs for Operator Burden

	Total/yr (o/o)	Primacy	DI	Source	Year 1 (Prim)	Year 2 (Prim)	Year 3 (Prim)	Year 1 (DI)	Year 2 (DI)	Year 3 (DI)
Class VI permit applications	13.33	5.00	8.33	UIC estimate	6	7	2	10	10	5
Class VI waiver applications	0.00	0.00	0.00	UIC estimate	0	0	0	0	0	0
Class VI wells in oper. phase	2.67	0.33	2.33	UIC estimate	0	0	1	1	2	4
Class VI doing an AoR reeval	0.33	0	0.33	UIC estimate	0	0	0	0	1	0
Class VI wells ceasing injection	0	0	0	UIC estimate	0	0	0	0	0	0
Class VI wells doing PISC	1	0	1	UIC estimate	0	0	0	1	1	1
Class VI wells performing n-e. demo	0	0	0	UIC estimate	0	0	0	0	0	0
Mining & Geological Engineer labor rate	\$ 105.78									
Geoscientist labor rate	\$ 118.26									
Class VI inflation factor	1.2021									
Primacy applications (total over clearance period)		5								

From BLS CPI calculator (final rule ICR was in 2008 dollars; inflate to match current year)
 UIC estimate: 2 states (Wyoming and Utah or Texas) will apply for Class VI primacy

Class 1 Haz	ReUn	Total Burden	Total Cost	Notes
Permitting/ startup		15,950	\$ 47,201,833	New assumption for # apps based on 7520-1 data in 2021
Monitoring/ testing		14,266	\$ 5,404,941	Monitoring and reporting changes commensurate w/ inventory changes for Class I - III
Reporting		7,566	#VALUE!	
Recordkeeping		363	\$ 11,947	
Well closure		42	\$ 57,387	
Total		38,187	#VALUE!	

Class 1 Nhaz	ReUn	Total Burden	Total Cost	Notes
Permitting/ startup		10,763	\$ 15,823,735	New assumption for # apps based on 7520 data.
Monitoring/ testing		72,891	\$ 21,629,186	
Reporting		27,617	\$ 1,729,391	
Recordkeeping		1,573	\$ 51,737	
Well closure		2	\$ 81	
Total		112,846	\$ 39,234,131	

Class 2	ReUn	Total Burden	Total Cost	Notes
Permitting/ startup	#45	349,708	\$ 26,710,988	New assumption for # apps based on 7520-1 data in 2021. Permitting is highest-burden activity. Total also includes completion reports and permit mods.
Monitoring/ testing	#0.6	416,966	\$ 123,973,084	Respondents = operators (not wells). Quarterly injectate monitoring; Recording of P/R/V (monthly); 5-year MITs.
Reporting	#6	239,680	\$ 12,879,306	Report monitoring data, MIT results; occasional reporting
Recordkeeping	#4	63,708	\$ 2,465,013	
Well closure	#3	3,270	\$ 184,000	Notification to director
Other	#2	70	\$ 3,809	Update financial responsibility in DI programs
Total		1,073,400	\$ 166,216,198	

Unit burdens are ranges because not all respondents do all activities; also frequencies of activities vary.

Class 3	ReUn	Total Burden	Total Cost	Notes
Permitting/ startup		12,889	\$ 4,668,151	New assumption for # apps based on 7520 data. Change in tot. app burden commensurate w/ responses; completion assumptions/MIT assumptions changed = large increase in total MIT burden
Monitoring/ testing		53,971	\$ 4,104,188	increase commensurate w/ inventory change in # of sites (33% in 2021)
Reporting		33,596	\$ 1,464,474	
Recordkeeping		1,020	\$ 36,338	
Well closure		4	\$ 294	
Other		33	\$ 1,792	FR demo in DI programs
Total		101,513	\$ 10,275,236	

Class 4	ReUn	Total Burden	Total Cost	Notes
Well closure		698	\$ 20,042	Used 7520-2B data in 2021, instead of SDW-08 data (no longer reported)
Total		698	\$ 20,042	

Class 5	ReUn	Total Burden	Total Cost	Notes
Inventory		6,613	\$ 164,578	Small unit burden, high number of responses. Similar est of # inventory forms as in last ICR
permit applications		1,036	\$ 1,082,518	Unchanged since 2018 9no data; EPA agrees)
Rule: Perm/close*		0	\$ -	These activities are complete as of 2018 ICR
Rule: Monitoring*		17,009	\$ 8,158,506	No new data on universe
Total		24,657	\$ 9,405,602	

Class 6	Total Burden	Total Cost	Notes
Permitting/ startup	47,699	\$ 69,947,096	Assuming a big jump in apps per 45Q
Monitoring/ testing	1,361	\$ 3,361,019	
Reporting	176	\$ 18,617	
Recordkeeping	0	\$ 0	
Well closure/post-injection	40	\$ 860,682	
Other	373	\$ 39,419	AoR reevaluations
Total	49,649	\$ 74,226,832	

All Classes - conform math; see eval in Column S	Total Burden	Total Cost	Pct of total o/o burden
Permitting/ startup/inventory	444,656	\$ 165,598,899	32%
Monitoring/ testing	576,465	\$ 166,630,923	41%
Reporting	308,635	#VALUE!	22%
Recordkeeping	66,663	\$ 2,565,035	5%
Well closure	4,055	\$ 1,122,487	0%
Other	475	\$ 45,020	0.03%
Total	1,400,950	#VALUE!	

2018 Burden	rden change	% change	2018 Cost	Cost change	% change
5,067	10,883	215%	\$ 14,139,767	\$ 33,062,067	234%
14,472	(207)	-1%	\$ 5,218,702	\$ 186,239	4%
7,676	(110)	-1%	\$ 657,325	#VALUE!	#VALUE!
368	(5)	-1%	\$ 11,211	\$ 737	7%
42	0	0%	\$ 55,225	\$ 2,162	4%
27,626	10,561	38%	\$ 20,082,230	#VALUE!	#VALUE!

Total Burden	Total Cost
2,468	\$ 3,073,630
67,134	\$ 18,881,530
25,436	\$ 1,469,376
1,448	\$ 44,074
2	\$ 75
96,488	\$ 23,468,686

Total Burden	Total Cost
90,232	\$ 5,999,308
471,761	\$ 133,163,891
271,174	\$ 12,865,624
72,080	\$ 2,523,276
3,262	\$ 169,570
74	\$ 3,705
908,583	\$ 154,725,375

Total Burden	Total Cost
6,013	\$ 1,858,349
40,479	\$ 2,791,167
25,197	\$ 987,692
765	\$ 24,926
4	\$ 261
6	\$ 276
72,464	\$ 5,662,670

Total Burden	Total Cost
6,503	\$ 165,832
6,503	\$ 165,832

Total Burden	Total Cost
6,827	\$ 142,436
1,036	\$ 1,043,730
0	\$ -
17,009	\$ 7,840,409
24,871	\$ 9,026,574

Total Burden	Total Cost
3,577	\$ 5,059,860
681	\$ 1,633,135
88	\$ 9,100
0	\$ 0
40	\$ 836,221
373	\$ 38,537
4,759	\$ 7,576,853

Burden change	% change	2018 Cost	Cost change	% change
114,185	330,472	\$ 30,130,913	\$ 135,467,986	450%
611,535	(35,071)	\$ 169,528,835	\$ (2,897,912)	-2%
329,571	(20,936)	\$ 15,989,117	#VALUE!	#VALUE!
74,661	(7,998)	\$ 2,603,488	\$ (38,452)	-1%
9,853	(5,798)	\$ 1,227,185	\$ (104,699)	-9%
452	23	\$ 42,518	\$ 2,502	6%
1,140,258	260,692	\$ 219,522,055	#VALUE!	#VALUE!

Summary of Annual Respondent Burden and Costs -- this page draws from the individual Class-specific tables and feeds all the summary s

Respondent Type	Number of Respondents	Number of Responses	Total Hours/ Year	Total Annual Labor Cost	Total Annual Non-labor Cost	Total Annual Respondent Cost
Class IH (operators)	73	2,065	38,187	#VALUE!	\$51,023,167	#VALUE!
Class IH (states)	38	706	3,648	\$167,532	\$0	\$167,532
Class INH (operators)	393	6,636	112,846	\$6,087,041	\$33,147,090	\$39,234,131
Class INH (states)	38	2,092	#VALUE!	#VALUE!	\$0	#VALUE!
Class I (operators)	466	8,701	151,032	#VALUE!	84,170,257	#VALUE!
Class I (states)	38	2,798	#VALUE!	#VALUE!	0	#VALUE!
Class II (operators)	15,927	418,056	1,073,400	\$56,894,584	\$109,321,614	\$166,216,198
Class II (states)	46	92,358	132,980	\$6,106,460	\$0	\$6,106,460
Class III (operators)	300	10,562	101,513	\$4,995,581	\$5,279,655	\$10,275,236
Class III (states)	38	1,571	4,483	\$205,865	\$0	\$205,865
Class IV (operators)	71	142	698	\$20,042	\$0	\$20,042
Class IV (states)	38	56	56	\$2,549	\$0	\$2,549
Class V (operators)	20,837	28,232	24,657	\$682,927	\$8,722,675	\$9,405,602
Class V (states)	38	14,618	7,938	\$364,494	\$0	\$364,494
Class VI (operators)	17	230	49,649	\$5,651,568	\$68,575,264	\$74,226,832
Class VI (states)	5.0	22	6,951	\$319,198	\$0	\$319,198
UIC Primacy Agencies	59	767	66,936	\$3,073,678	\$0	\$3,073,678
Respondent Total		578,113	#VALUE!	#VALUE!	\$276,069,465	#VALUE!
operator total	37,618	465,923	1,400,950	#VALUE!	\$ 276,069,465	#VALUE!
state total	59	112,190	#VALUE!	#VALUE!	\$ -	#VALUE!
3 year total		1,734,340	#VALUE!	#VALUE!	\$828,208,394	#VALUE!
Burden/cost per response			#VALUE!			#VALUE!

Change in Annual Respondent Burden - hard enter values for previous ICR; current ICR columns reference other worksheets.

Operator Burden Change	Previous (2018)	This ICR (2021)	Net Change	Pct change	Reasons for change (2021)	Non-labor cost change	Non-Labor cost change (%)
Class I (operators)	124,114	151,032	26,919	22%	Inventory increased by 7% (this affect	\$46,726,677	56%
Class II (operators)	908,583	1,073,400	164,817	18%	Inventory reduced by 12%; new assur	(\$3,530,708)	-3%
Class III (operators)	72,464	101,513	29,050	40%	Number of sites (driver of M&R burde	\$2,749,595	52%
Class IV (operators)	6,503	698	-5,806	-89%	Using 7520-2B data for well closure	\$0	0%
Class V (operators)	24,871	24,657	-214	-0.9%	Inventory data shows consistent annu	\$297,913	3%
Class VI (operators)	4,759	49,649	44,890	943%	Big increase in number of apps expec	\$61,480,430	90%
Operator Total	1,141,294	1,400,950	259,656	23%		\$107,723,907	39%

Primacy Burden Change	Previous (2018)	This ICR (2021)	Net Change	Pct change	Reasons for change (2021)
Class I (states)	6,058	#VALUE!	#VALUE!	#VALUE!	Many new apps reviewed (from 19 to 90 in primacy states); also higher % of total wells are in primacy sta
Class II (states)	64,732	132,980	68,248	105%	Many new apps reviewed (from 1,262 to 5,826 in primacy state)
Class III (states)	2,706	4,483	1,777	66%	Many new apps reviewed (from 18 to 39 in primacy state); also higher % of total wells are in primacy stat
Class IV (states)	508	56	-452	-89%	Using 7520-2B numbers for well closure instead of PAMs (was 659, now 71)
Class V (states)	8,143	7,938	-205	-2.5%	Inventory data shows consistent annual increase relative to last ICR; small adjustment only
Class VI (states)	1,058	6,951	5,893	557%	Increase in apps; also a shift from DI burden as states get primacy
UIC Primacy Agencies	67,762	66,936	-826	-1%	We need to estimate burden for using web-based system (no good input from WG). Do we make an estim
State Total	150,966	#VALUE!	#VALUE!	#VALUE!	

Total changes: 2018-2021

2018 totals	hours	total cost (lab+non)	reponses
operator	1,141,294	\$220,708,221	460,604
state	150,966	\$6,599,038	96,765
Total	1,292,260	\$227,307,259	557,370

2021 totals			
operator	1,400,950	#VALUE!	465,923
state	#VALUE!	#VALUE!	112,190
total	#VALUE!	#VALUE!	578,113

Change			
operator	259,656	#VALUE!	5,319
state	#VALUE!	#VALUE!	15,425
total	#VALUE!	#VALUE!	20,744

For section 6(f)

Approved burden - Oper & State	1,292,260
This ICR burden - Oper & State	#VALUE!
Change	#VALUE!
Oper change	259,656
State change	#VALUE!

Inventory	Total	Class 1	Class 2
Total - 2018 ICR	701,213	828	180,199
Total - 2021 ICR	753,544	885	159,269
Change	52,331	57	-20,930
Percent change	7%	7%	-12%

Changes in # of wells in Primacy states

	Previous	This ICR
Class I wells	83%	83%
Class II	98%	98%
Class III sites	78%	84%
Class IV		
Class V	70%	70%

Reasons for change

ROCIS splits between Agency discretion (aka Program changes) and Agency estimate (aka adjustments). The rows below break out the Agency discretion change in hrs/resp/\$ by type of respondent. All other changes are Agency estimate

For ICR bullets and ICRAS form

Program changes ("Agency discretion" in ROCIS)	ROCIS category	Burden change	responses change	Non-lab cost change	Notes
7520 burden changes -oper	Pr	-240	0		\$0 This is the savings associated with using the e-version of 7520-16. See Cla
States gaining Class VI primacy	S/M	4,160	16		\$0 Assume ~80% of Class VI application burden is by states w/ new primacy I
State savings due to Web-based data system and e-7520-1	S/M	-826	0		\$0 No more recordkeeping burden; some inventory savings due to e-7520-16
Total due to Agency discretion	S/M total	3,334	16		\$0
	Private total	-240	0		\$0

Adjustments ("Agency estimate" in ROCIS) --only need this for ICR bullets, so just hours are calculated

Permit applications (1-3)		285,529			In 2021, different assumptions source affected this greatly; operator only
Class VI applications		44,121			Big increase in apps expected per 45Q tax credit; operator only
Class IV/V closures		-5,806			In 2021, different assumptions source affected this greatly; operator only
Inventory-dependent changes (M&R)		-64,774			Sums monitoring, reporting, rkeeping rows; operator only (commensurate
Other changes		#VALUE!			Everything not included above (state changes and closures of all but 4/5, ;
Total adjustments		#VALUE!			

Reasons for Change (2018)

Class I inventory changed -2% since 2015

Class II inventory changed only 2% since 2015. Much smaller increase than

Commensurate with increase in Class III sites (32%) since 2015

Commensurate with inventory change

Class V inventory changed 3% since 2015; assume no additional Class V

Reduced number of permit applications (biggest component)

Reasons for Change (2018)

DI v. Primacy split changed (WY fix); added 2 new H apps to review

Reduction due to revising assumed number of permit applications from 48

Commensurate with inventory change

Reduced number of permit applications to review and states applying for

Added KY; fixes to number of primacy states per QA. No more e-reporting

Class 3	Class 5	Class 3 sites
24,669	495,517	225
22,612	570,778	300
-2,057	75,261	75
-8%	15%	33%

Kyle's Summary Table

	2018
Respondents	40,168
Burden	1,292,260
Total Cost	\$227,307,259
O&M Cost	\$168,345,558
Labor Cost	\$58,961,701

ie.

ss V page; only # hours changes. States get a savings too (see state sheet).
(see Class VI assumptions page)
5

e w/ Class I - III inventory drop)
aquifer exemptions)

**Exhibit 6-2: Annual Reporting Burden by Form (Operators)
2022-2024**

Form	Well classes responding	Unit burden/ response	Number of responses	Total burden (this class)	Total burden (this form)
7520-6: UIC Permit Application	I-H	215	36	5,631	261,456
	I-NH	104	73	7,244	
	II	61	5,956	242,607	
	III	123	44	4,939	
	V	104	10	1,036	
7520-7: Application to Transfer Permit/Ownership	I-H	2.9	1	3	1,165
	I-NH	3.9	1	4	
	II	4.7	239	1,115	
	III	5.8	8	44	
7520-8: Injection Well Monitoring Report	I-H	24.7	291	7,188	63,245
	I-NH	14.4	1,573	22,635	
	III	27.9	1,200	33,421	
7520-11: Annual Class II Disposal/Injection Well Monitoring Report	II	29.7	4,698	139,621	139,621
7520-16: Inventory of Class V Injection Wells	V	0.4	19,348	6,613	6,613
7520-17: Class V Pre-Closure and Post-Closure Notification Form	V	1.4	71	96	96

Notes
The number of responses equals the number of permit applications/year; not all applicants perform all permit application-related activities, so these numbers may not appear to total.
The ICR assumes that a portion of the occasional notifications to the Director are permit transfer applications.
The number of responses includes closures of Class IV/endangering Class V wells.

These are Exhibits 6-1, 6-2, 6-3, and 6-7 in the ICR. No inputs to this sheet are needed; every cell references another sheet.

Exh 6.1 A: Class 1

Respondent type	Annual Burden	Labor Cost	O&M Cost	Total Cost	Responses	Burd/ Resp
Operators	151,032	#VALUE!	\$84,170,257	#VALUE!	8,701.1	17.36
Primacy States	#VALUE!	#VALUE!	\$0	#VALUE!	2,798.4	#VALUE!
DI Programs	19,885	\$913,101	\$0	\$913,101	815.8	24.37
Total	#VALUE!	#VALUE!	\$84,170,257	#VALUE!	12,315.3	#VALUE!

Exh 6.1 B: Class 2

Respondent type	Annual Burden	Labor Cost	O&M Cost	Total Cost	Responses	Burd/ Resp
Operators	1,073,400	\$56,894,584	\$109,321,614	\$166,216,198	418,055.8	2.57
Primacy States	132,980	\$6,106,460	\$0	\$6,106,460	92,357.6	1.44
DI Programs	5,938	\$272,682	\$0	\$272,682	5,111.9	1.16
Total	1,212,319	\$63,273,726	\$109,321,614	\$172,595,339	515,525.3	2.35

Exh 6.1 C: Class 3

Respondent type	Annual Burden	Labor Cost	O&M Cost	Total Cost	Responses	Burd/ Resp
Operators	101,513	\$4,995,581	\$5,279,655	\$10,275,236	10,562.0	9.61
Primacy States	4,483	\$205,865	\$0	\$205,865	1,571.5	2.85
DI Programs	215	\$9,886	\$0	\$9,886	161.3	1.33
Total	106,212	\$5,211,332	\$5,279,655	\$10,490,987	12,294.8	8.64

Exh 6.1 D: Class 4

Respondent type	Annual Burden	Labor Cost	O&M Cost	Total Cost	Responses	Burd/ Resp
Operators	698	\$20,042	\$0	\$20,042	141.5	4.93
Primacy States	56	\$2,549	\$0	\$2,549	55.5	1.00
DI Programs	15	\$700	\$0	\$700	15.3	1.00
Total	769	\$23,291	\$0	\$23,291	212.3	3.62

Exh 6.1 E: Class 5

Respondent type	Annual Burden	Labor Cost	O&M Cost	Total Cost	Responses	Burd/ Resp
Operators	24,657	\$682,927	\$8,722,675	\$9,405,602	28,232.5	0.87
Primacy States	7,938	\$364,494	\$0	\$364,494	14,617.7	0.54
DI Programs	3,242	\$148,889	\$0	\$148,889	6,229.7	0.52
Total	35,837	\$1,196,310	\$8,722,675	\$9,918,985	49,079.9	0.73

Exh 6.1 F: Class 6

Respondent type	Annual Burden	Labor Cost	O&M Cost	Total Cost	Responses	Burd/ Resp
Operators	49,649	\$5,651,568	\$68,575,264	\$74,226,832	230.3	215.61
Primacy States	6,951	\$319,198	\$0	\$319,198	22.3	311.25
DI Programs	9,060	\$416,028	\$0	\$416,028	43.1	210.37
Total	65,660	\$6,386,794	\$68,575,264	\$74,962,058	295.7	222.07

Exh 6.1 G: All Classes

Respondent type	Annual Burden	Labor Cost	O&M Cost	Total Cost	Responses	Burd/ Resp
Class 1 operators	151,032	#VALUE!	\$84,170,257	#VALUE!	8,701.1	17.36
Class 2 operators	1,073,400	\$56,894,584	\$109,321,614	\$166,216,198	418,055.8	2.57
Class 3 operators	101,513	\$4,995,581	\$5,279,655	\$10,275,236	10,562.0	9.61
Class 4 operators	698	\$20,042	\$0	\$20,042	141.5	4.93
Class 5 operators	24,657	\$682,927	\$8,722,675	\$9,405,602	28,232.5	0.87
Class 6 operators	49,649	\$5,651,568	\$68,575,264	\$74,226,832	230.3	215.61
All Classes	1,400,950	#VALUE!	\$276,069,465	#VALUE!	465,923	3.01

\$/ Response	Respondents
#VALUE!	466
#VALUE!	38
\$1,119.27	8
#VALUE!	512

\$/ Response	Respondents
\$397.59	15,927
\$66.12	46
\$53.34	6
\$334.80	15,979

\$/ Response	Respondents
\$972.85	300
\$131.00	38
\$61.28	8
\$853.29	346

\$/ Response	Respondents
\$141.64	71
\$45.92	38
\$45.92	8
\$109.74	117

\$/ Response	Respondents
\$333.15	20,837
\$24.94	38
\$23.90	8
\$202.10	20,883

\$/ Response	Respondents
\$322,351.62	17.3
\$14,292.43	5.0
\$9,660.08	1.0
\$253,535.71	23.3

\$/ Response	Respondents
#VALUE!	466
\$397.59	15,927
\$972.85	300
\$141.64	71
\$333.15	20,837
\$322,351.62	17
#VALUE!	37,618

Exhibit 6.3 Annual Primacy Agency Burden and Cost

Program Type	Annual Burden	Labor Cost	O&M Cost	Total Cost	Responses	Burd/ Resp	\$/ Response
Class 1 Primacy	#VALUE!	#VALUE!	\$0	#VALUE!	2,798.4	#VALUE!	#VALUE!
Class 2 Primacy	132,980	\$6,106,460	\$0	\$6,106,460	92,357.6	1.44	\$66.12
Class 3 Primacy	4,483	\$205,865	\$0	\$205,865	1,571.5	2.85	\$131.00
Class 4 Primacy	56	\$2,549	\$0	\$2,549	55.5	1.00	\$45.92
Class 5 Primacy	7,938	\$364,494	\$0	\$364,494	14,617.7	0.54	\$24.94
Class 6 Primacy	6,951	\$319,198	\$0	\$319,198	22.3	311.25	\$14,292.43
Subtotal -oper oversight	#VALUE!	#VALUE!	\$0	#VALUE!	111,423.1	#VALUE!	#VALUE!
States as Respondents	66,936	\$3,073,678	\$0	\$3,073,678	767.0	87.27	\$4,007.40
Total	#VALUE!	#VALUE!	\$0	#VALUE!	112,190.1	#VALUE!	#VALUE!

Exh 6.5 Annual Agency Burden and Cost

Program Type	Annual Burden	Labor Cost	O&M Cost	Total Cost	Responses	Burd/ Resp	\$/ Response
Class I DI	19,885	\$913,101	\$0	\$913,101	815.8	24.37	\$1,119.27
Class II DI	5,938	\$272,682	\$0	\$272,682	5,111.9	1.16	\$53.34
Class III DI	215	\$9,886	\$0	\$9,886	161.3	1.33	\$61.28
Class IV DI	15	\$700	\$0	\$700	15.3	1.00	\$45.92
Class V DI	3,242	\$148,889	\$0	\$148,889	6,229.7	0.52	\$23.90
Class VI DI	9,060	\$416,028	\$0	\$416,028	43.1	210.37	\$9,660.08
HQ Activities	4,160	\$191,027	\$0	\$191,027	1.0	4,160	\$191,027
Total	42,516	\$1,952,314	\$0	\$1,952,314	12,378.1	3.43	\$157.72
DI Total	38,356	\$1,761,287	\$0	\$1,761,287	12,377.1	3.10	\$142.30

Exhibit 6.7 All Classes

Respondent type	Annual Burden	Labor Cost	O&M Cost	Total Cost	Responses	Burd/ Resp	\$/ Response
Operators	1,400,950	#VALUE!	\$276,069,465	#VALUE!	465,923.1	3.01	#VALUE!
Primacy States	#VALUE!	#VALUE!	\$0	#VALUE!	112,190.1	#VALUE!	#VALUE!
Respondent total	#VALUE!	#VALUE!	\$276,069,465	#VALUE!	578,113.2	#VALUE!	#VALUE!
Federal	42,516	\$1,952,314	\$0	\$1,952,314	12,378.1	3.43	\$157.72
Total	#VALUE!	#VALUE!	\$276,069,465	#VALUE!	590,491.2	#VALUE!	#VALUE!

3-yr tot. (non-Fed)	Burden	Labor Cost	O&M Cost	Total Cost	Responses
	#VALUE!	#VALUE!	\$828,208,394	#VALUE!	1,734,340
Per response	#VALUE!			#VALUE!	
Per respondent	#VALUE!			#VALUE!	

Respondents

38
46
38
38
38
5
59
59

Respondents

10
10
10
10
10
1
11
10

Respondents

37,618
59
37,677
11
37,688

Exhibit 6.6 Bottom Line Annual Burden and Cost

Number of Respondents	37,677 =	37,618 Operators (from EPA inventory) + 59 Primacy agencies
Total Annual Responses	578,113 =	465,923 Operator responses (from Exhibit 6-1G) + 112,190 Primacy agency responses (from Exhibit 6-3)
Number of Responses per Respondent	15.3 =	578,113 Total annual responses from above/ 37,677 Total respondents from above
Total Respondent Hours	#VALUE! =	1,400,950 Operator burden hours (from Exhibit 6-1G) + #VALUE! Primacy agency burden hours (from Exhibit 6-3)
Hours per Response	#VALUE! =	#VALUE! Total annual hours from above/ 578,113 Total responses from above
Annual O&M and Capital Cost	\$276,069,465 =	\$276,069,465 Operator non-labor cost (from Exhibit 6-1G) + \$0 Primacy agency non-labor cost (from Exhibit 6-3)
Total Respondent Cost	#VALUE! =	#VALUE! Operator cost (from Exhibit 6-1G) + #VALUE! Primacy agency cost (from Exhibit 6-5)
Total Hours (Respondents)	#VALUE! =	#VALUE! Total respondent hours from above + 42,516 Total EPA hours (from Exhibit 6-5)
Total Cost (Respondents plus Agency)	#VALUE! =	#VALUE! Total respondent cost from above + \$1,952,314 Total EPA cost (from Exhibit 6-5)

**Table A-1A
Annual Paperwork Burden and Costs Associated with Class I Hazardous Wells: Operators**

Description of Requirement	Frequency (A)	Hours and Costs per Response						Total Hours and Costs			
		Legal	Managerial	Technical	Clerical	Unit Burden	Unit Labor Cost	Unit Non-labor Cost (B)	No. of Responses	Total Hours/Year	Total Cost/Year
Initial/Startup Requirements (Per Permit Application)											
Requirements associated with permit applications											
Read permit application directions.	One-time	0.0	0.25	0.25	0.00	0.5	\$38	\$0	36	18	\$1,379
Gather and submit description of activities requiring a permit, facility name and address, SIC codes, ownership & facility status, facility location, listing of relevant permits/construction approvals, description of the business.	One-time	3.0	2.0	9.0	5.8	19.8	\$1,176	\$0	36	711	\$42,354
In DI programs, gather and submit a list of land owners within one-quarter mile of the facility boundary.	One-time	4.0	0.0	0.0	1.2	5.2	\$422	\$0	6	32	\$2,609
Prepare and submit a map and tabulation of all wells within the AoR.	One-time	0.0	1.5	5.5	0.0	7.0	\$454	\$25,643	36	252	\$939,490
Prepare and submit AoR protocol.	One-time	0.0	0.0	1.3	0.0	1.3	\$73	\$993	36	47	\$38,388
Prepare and submit maps/cross sections of local and regional geology, USDWs.	One-time	0.0	1.5	16.0	0.0	17.5	\$1,043	\$53,239	36	630	\$1,954,133
Develop formation testing and stimulation programs & injection procedures.	One-time	0.0	2.0	5.0	1.0	8.0	\$506	\$7,642	36	287	\$293,332
Prepare and submit contingency plans for shut-ins or well failures.	One-time	0.0	3.0	10.0	1.9	14.9	\$915	\$297	36	537	\$43,650
Prepare and submit ambient monitoring plan.	One-time	0.0	3.0	0.0	0.0	3.0	\$287	\$5,010	36	106	\$190,665
Prepare and submit Corrective Action Plan.	One-time	0.0	2.0	3.0	2.2	7.2	\$435	\$12,694	36	259	\$472,650
Prepare and submit descriptions of logs and tests, construction schematics & operating data.	One-time	0.0	2.0	8.0	4.8	14.8	\$801	\$6,368	36	533	\$258,084
Prepare and submit closure plan, including demonstration of financial responsibility.	One-time	0.0	1.0	3.0	2.1	6.1	\$336	\$1,877	36	221	\$79,637
Prepare and submit post-closure care plan.	One-time	0.0	1.4	2.0	1.3	4.7	\$291	\$2,310	36	169	\$93,623
Prepare and submit information to support an aquifer exemption request.	One-time	0.0	2.5	17.0	0.5	20.0	\$1,213	\$2,310	6.1	122	\$21,555

**Table A-1A
Annual Paperwork Burden and Costs Associated with Class I Hazardous Wells: Operators**

Description of Requirement	Frequency (A)	Hours and Costs per Response						Total Hours and Costs			
		Legal	Managerial	Technical	Clerical	Unit Burden	Unit Labor Cost	Unit Non-labor Cost (B)	No. of Responses	Total Hours/Year	Total Cost/Year
Requirements for active hazardous waste facilities											
Gather and submit dates of well operation and specific waste information.	One-time	0.0	0.0	26.6	10.9	37.5	\$1,852	\$9,680	36	1,351	\$415,126
Gather and submit hazardous waste release information.	One-time	0.0	1.9	30.4	21.9	54.2	\$2,609	\$4,840	0	0	\$0
Develop waste analysis plan.	One-time	0.0	1.9	15.2	1.8	18.9	\$1,097	\$3,227	36	681	\$155,645
Prepare construction logging/testing schedule.	One-time	0.0	0.0	0.5	0.5	1.0	\$44	\$0	36	35	\$1,578
Requirements associated with completion reports											
Prepare and submit completion report.	One-time	0.0	0.0	1.5	2.4	3.9	\$164	\$0	36	142	\$5,916
Submit results of deviation checks, other logs & tests; sample formation fluids; test injection and confining zones.	One-time	0.0	0.0	6.0	1.0	7.0	\$369	\$39,059	36	251	\$1,419,377
Demonstrate mechanical integrity.	One-time	0.0	2.0	18.0	0.0	20.0	\$1,204	\$25,473	36	720	\$960,358
Submit information on the anticipated maximum pressure and flow rate.	One-time	0.0	0.0	2.0	0.0	2.0	\$112	\$170	36	72	\$10,151
Submit formation testing results.	One-time	0.0	1.0	4.0	0.0	5.0	\$321	\$42,455	36	180	\$1,539,952
Submit actual injection procedure.	One-time	0.0	0.0	1.0	0.0	1.0	\$56	\$170	36	36	\$8,132
Demonstrate hydrogeologic compatibility/compatibility of well materials.	One-time	0.0	2.0	6.0	0.0	8.0	\$531	\$8,491	36	288	\$324,782
Prepare and submit information on calculated AoR.	One-time	0.0	0.0	2.0	0.0	2.0	\$112	\$3,396	36	72	\$126,308
No-migration petition requirements											
Submit waste information and modeling data to demonstrate that wastes will not migrate from injection zone.	One-time	0.0	24.0	120.0	30.0	174.0	\$10,047	\$891,555	36	6,264	\$32,457,677
Requirements associated with permit renewals/modifications and petition modifications											
Submit updated permit application attachments.	Occasional	0.0	9.0	41.5	21.0	71.5	\$3,892	\$12,567	12	858	\$197,506
Request Permit Modification.	One-time	0.0	2.0	6.0	2.0	10.0	\$597	\$7,302	3	30	\$23,696
Prepare and submit Petition Modification.	One-time	0.0	24.0	120.0	30.0	174.0	\$10,047	\$843,966	6	1,044	\$5,124,081

**Table A-1A
Annual Paperwork Burden and Costs Associated with Class I Hazardous Wells: Operators**

Description of Requirement	Frequency (A)	Hours and Costs per Response						Total Hours and Costs			
		Legal	Managerial	Technical	Clerical	Unit Burden	Unit Labor Cost	Unit Non-labor Cost (B)	No. of Responses	Total Hours/Year	Total Cost/Year
Monitoring/Testing Requirements (Per Facility)											
Use continuous recording devices to monitor injection pressure, flow rate, volume, and temperature.	Continuous	0.0	0.0	5.7	0.0	5.7	\$320	\$0	73	414	\$23,215
Conduct chemical monitoring of injectate as prescribed in waste analysis plan.	As specified in WAP	0.0	0.0	38.0	0.0	38.0	\$2,131	\$5,095	291	11,040	\$2,099,177
Conduct additional chemical monitoring as specified by the Director.	Varies	0.0	0.0	7.6	0.0	7.6	\$426	\$1,019	29	221	\$41,984
Conduct casing pressure test and radioactive tracer survey of bottom-hole cement.	Annual	0.0	3.8	5.2	0.0	9.0	\$661	\$7,033	58	523	\$447,048
Conduct casing pressure test, radioactive tracer of bottom-hole cement, & noise/temperature logs to check for movement along the borehole.	Every 5 years	0.0	1.0	7.0	0.0	8.0	\$490	\$48,399	15	116	\$710,168
Conduct casing inspection log at workover.	Occasional	0.0	3.8	8.0	0.0	11.8	\$818	\$8,440	4	43	\$33,619
Conduct pressure fall-off test.	Annual	0.0	6.0	18.0	0.0	24.0	\$1,592	\$19,693	73	1,743	\$1,545,941
Conduct ambient monitoring.	Annual	0.0	0.4	1.9	0.0	2.3	\$143	\$6,793	73	166	\$503,791
Reporting Requirements (Per Facility)											
Prepare and submit report on maximum injection pressure, total injectate volume, and monitoring and testing results.	Quarterly	0.0	4.0	15.0	5.7	24.7	#VALUE!	\$0	291	7,188	#VALUE!
Prepare and submit MIT report.	Annual	0.0	1.0	2.0	1.0	4.0	#VALUE!	\$1,528	73	291	#VALUE!
Notify Director of: any planned physical changes to facility, changes that may result in noncompliance, permit transfers, planned workovers, USDW endangerment.	Occasional	0.0	1.0	2.0	3.0	6.0	#VALUE!	\$0	1	4	#VALUE!
Prepare and submit revised plugging and abandonment cost estimate.	Annual	0.0	1.0	0.0	0.0	1.0	#VALUE!	\$0	73	73	#VALUE!
Report on: events exceeding operating parameters or triggering alarms; changes in annular fluid volume; workovers or other testing; or permit transfers.	Occasional	0.0	1.0	1.0	0.9	2.9	\$182	\$0	4	10	\$661

**Table A-1A
Annual Paperwork Burden and Costs Associated with Class I Hazardous Wells: Operators**

Description of Requirement	Frequency (A)	Hours and Costs per Response						Total Hours and Costs			
		Legal	Managerial	Technical	Clerical	Unit Burden	Unit Labor Cost	Unit Non-labor Cost (B)	No. of Responses	Total Hours/Year	Total Cost/Year
Recordkeeping Requirements (Per Facility)											
Maintain monitoring information, calibration & maintenance records, required reports, application data, monitoring results, and most recent plugging & abandonment cost estimate.	3 years	0.0	0.0	0.0	5.0	5.0	\$164	\$0	73	363	\$11,947
Closure Requirements (Per Well)											
Prepare and submit notice of intent to close.	One-time	0.0	0.5	0.0	1.0	1.5	\$81	\$0	1	2	\$81
Prepare and submit closure report.	One-time	0.0	2.0	8.0	0.0	10.0	\$643	\$3,396	1	10	\$4,039
Conduct pressure fall-off test.	One-time	0.0	1.0	5.0	0.0	6.0	\$378	\$19,693	1	6	\$20,070
Demonstrate mechanical integrity.	One-time	0.0	2.0	18.0	0.0	20.0	\$1,204	\$31,789	1	20	\$32,993
Notify state or local zoning or drilling authorities and Regional Administrator following closure.	One-time	0.0	0.5	1.0	3.0	4.5	\$203	\$0	1	5	\$203
TOTAL									2,065	38,187	#VALUE!
Notes: (A) EPA assumes that occasional notification will be incl (B) EPA assumes that there are no start-up costs; all non EPA assumes one well per facility for start-up and closure Numbers may not add due to rounding.											

Table A-1A (continued)
Annual Paperwork Burden and Costs Associated with Class I Hazardous Wells: State

	Hours and Costs per Response				Total H
	A	B	C	D	
Description of Requirement	Frequency (A)	Unit Burden (B)	Unit Labor Cost	Unit Nonlabor Cost	Number of State Responses
Initial/Start-up					
Permit Applications					
Consider the permit application, AoR, relevant maps and cross sections, fluid injection rate and volume, proposed contingency plans, monitoring plans, and construction procedures as required at 146.70 and prepare draft permit.	One-time	40.0	\$1,837	\$0	30
Provide public notice of issuance of a draft permit or intent to deny.	One-time	1.0	\$46	\$0	30
Consider public comments.	One-time	6.0	\$276	\$0	30
Issue final permit decision.	One-time	2.0	\$92	\$0	30
Respond to comments.	One-time	7.0	\$321	\$0	30
Review notice of completion of construction.	One-time	2.0	\$92	\$0	30
Review information related to aquifer exemption requests and forward to EPA region.	One-time	1.0	\$46	\$0	5
No-Migration Petitions					
Review and respond to petition request.	One-time	18.0	\$827	\$0	30
Public notice/public comment.	One-time	10.0	\$459	\$0	30
Review and respond to petition modification request.	One-time	10.0	\$459	\$0	5
Permit renewals/modifications					
Review and respond to requests for permit modifications or re-issuance.	Occasional	30.0	\$1,378	\$0	10

Table A-1A (continued)
Annual Paperwork Burden and Costs Associated with Class I Hazardous Wells: State

	Hours and Costs per Response				Total H
	A	B	C	D	
Description of Requirement	Frequency (A)	Unit Burden (B)	Unit Labor Cost	Unit Nonlabor Cost	Number of State Responses
Monitoring/Testing					
Review quarterly monitoring and testing results.	Quarterly	1.5	\$69	\$0	241
Review casing pressure test and radioactive tracer survey of bottom-hole cement.	Annual	4.0	\$184	\$0	48
Review casing pressure test, radioactive tracer survey of bottom-hole cement, and logs.	Every 5 years	4.0	\$184	\$0	12
Review pressure fall-off test.	Annual	2.0	\$92	\$0	46
Other Reporting					
Respond to periodic notifications by owners and operators.	Occasional	2.0	\$92	\$0	5
Closure					
Review closure and post-closure plans prior to approving plugging and abandonment.	One-time	2.0	\$92	\$0	1
Witness and review pressure fall-off test prior to authorizing closure.	One-time	24.0	\$1,102	\$0	1
TOTAL					706

Notes:

(A) For quarterly activities, the number of responses = number of facilities X 4.

(B) EPA assumes one well per facility for start-up and closure activities; and 1.9 wells per facility for all other activities.

Regions review 17 percent of MITs and 23 percent of pressure fall-off tests in primacy states.

Numbers may not add due to rounding.

S

E F

Hours and Costs

Total State Hours/Year	Total State Cost/Year
1,193	\$54,768
30	\$1,369
179	\$8,215
60	\$2,738
209	\$9,584
60	\$2,738
5	\$233
537	\$24,645
298	\$13,692
50	\$2,282
298	\$13,692

S

E F

Hours and Costs

Total State Hours/Year	Total State Cost/Year
361	\$16,574
193	\$8,840
48	\$2,210
93	\$4,254
10	\$456
2	\$92
24	\$1,102
3,648	\$167,532

**Table A-1B
Annual Paperwork Burden and Costs Associated with Class I Nonhazardous Wells: Operators**

Description of Requirement	Frequency (A)	Hours and Costs per Response						Total Hours and Costs			
		Legal	Managerial	Technical	Clerical	Unit Burden	Unit Labor Cost	Unit Non-Labor Cost (B)	No. of Responses	Total Hours/Year	Total Cost/Year
Initial/Startup Requirements (Per Permit A)											
Requirements associated with permit appl.											
Read permit application directions.	One-time	0.0	0.25	0.25	0.00	0.5	\$38	\$0	73	37	\$2,796
Gather and submit description of activities requiring a permit, facility name & address, SIC codes, ownership & facility status, facility location, list of relevant permits/construction approvals, description of the business.	One-time	3.0	2.0	9.0	5.8	19.8	\$1,179	\$0	73	1,448	\$86,071
In DI programs, gather and submit a list of landowners within 1/4 mile of the facility boundary.	One-time	4.0	0.0	0.0	1.2	5.2	\$423	\$0	13	65	\$5,298
Prepare and submit a map and tabulation of all wells within the AoR.	One-time	0.0	1.5	5.5	0.0	7.0	\$454	\$20,514	73	511	\$1,530,691
Prepare and submit maps/cross sections of local and regional geology, USDWs.	One-time	0.0	1.5	16.0	0.0	17.5	\$1,043	\$53,239	73	1,278	\$3,962,547
Prepare and submit descriptions of logs and tests, construction schematics and operating data.	One-time	0.0	2.0	8.0	2.4	12.4	\$723	\$6,368	73	908	\$517,652
Develop formation testing and stimulation programs and injection procedures.	One-time	0.0	2.0	7.0	1.0	10.0	\$619	\$7,642	73	728	\$603,031
Prepare and submit contingency plans for shut-ins or well failures.	One-time	0.0	3.0	10.0	1.9	14.9	\$916	\$297	73	1,091	\$88,574
Prepare and submit ambient monitoring plan.	One-time	0.0	3.0	3.0	2.9	8.9	\$556	\$5,010	73	651	\$406,269
Prepare and submit Corrective Action Plan.	One-time	0.0	2.0	3.0	2.2	7.2	\$436	\$9,765	73	528	\$744,655
Prepare and submit closure plan, including demonstration of financial responsibility.	One-time	0.0	1.0	3.0	2.1	6.1	\$336	\$1,877	73	448	\$161,486
Prepare and submit information to support an aquifer exemption request.	One-time	0.0	2.5	17.0	0.5	20.0	\$0	\$0	12.4	248	\$0

**Table A-1B
Annual Paperwork Burden and Costs Associated with Class I Nonhazardous Wells: Operators**

Description of Requirement	Frequency (A)	Hours and Costs per Response						Total Hours and Costs			
		Legal	Managerial	Technical	Clerical	Unit Burden	Unit Labor Cost	Unit Non-Labor Cost (B)	No. of Responses	Total Hours/Year	Total Cost/Year
Requirements associated with completion											
Prepare and submit completion report.	One-time	0.0	0.0	1.5	2.4	3.9	\$163	\$0	73	285	\$11,922
Prepare and submit a report of deviation checks and other logs and tests during construction.	One-time	0.0	0.0	6.0	1.0	7.0	\$368	\$39,059	73	508	\$2,878,151
Demonstrate mechanical integrity.	One-time	0.0	2.0	3.5	0.0	5.5	\$391	\$11,038	73	402	\$834,305
Submit information on the anticipated maximum pressure and flow rate.	One-time	0.0	0.0	2.0	0.0	2.0	\$112	\$170	73	146	\$20,584
Submit results of the formation testing program.	One-time	0.0	1.0	4.0	0.0	5.0	\$321	\$42,455	73	365	\$3,122,680
Submit actual injection procedure.	One-time	0.0	0.0	1.0	0.0	1.0	\$56	\$170	73	73	\$16,490
Demonstrate hydrogeologic compatibility/compatibility of well materials.	One-time	0.0	2.0	6.0	0.0	8.0	\$531	\$8,491	73	584	\$658,585
Requirements associated with permit rene											
Submit updated components of permit application attachments.	Occasional	0.0	8.0	11.0	2.0	21.0	\$1,460	\$5,944	20	420	\$148,068
Prepare and submit request for permit modification.	Occasional	0.0	2.0	6.0	0.0	8.0	\$531	\$4,246	5	40	\$23,881
Monitoring/Testing Requirements (Per Fac											
Analyze injected fluids.	Per permit	0.0	0.0	38.0	0.0	38.0	\$2,131	\$3,396	1,573	59,760	\$8,692,292
Monitor injection pressure, flow rate and volume, and annulus pressure.	Continuous	0.0	0.0	5.7	0.0	5.7	\$320	\$0	393	2,241	\$125,663
Demonstrate mechanical integrity.	Every 5 years	0.0	1.0	8.0	0.0	9.0	\$546	\$20,973	79	708	\$1,692,034
Conduct pressure fall-off test.	Annual	0.0	8.0	16.0	0.0	24.0	\$1,674	\$19,693	393	9,436	\$8,400,532
Conduct ambient monitoring.	Annual	0.0	0.4	1.5	0.0	1.9	\$122	\$6,793	393	747	\$2,718,665

**Table A-1B
Annual Paperwork Burden and Costs Associated with Class I Nonhazardous Wells: Operators**

Description of Requirement	Frequency (A)	Hours and Costs per Response						Total Hours and Costs			
		Legal	Managerial	Technical	Clerical	Unit Burden	Unit Labor Cost	Unit Non-Labor Cost (B)	No. of Responses	Total Hours/Year	Total Cost/Year
Reporting Requirements (Per Facility)											
Report on: physical, chemical, and other characteristics of injected fluids; injection pressure, flow rate, and volume; and monitoring of USDWs.	Quarterly	0.0	0.0	4.0	10.4	14.4	\$566	\$0	1,573	22,635	\$890,438
Report results of ambient monitoring and pressure fall-off test.	Annual	0.0	2.0	6.0	4.0	12.0	\$662	\$1,406	393	4,718	\$813,217
Notify Director of: any planned physical changes to facility, changes that may result in noncompliance, permit transfers, planned workovers, possible endangerment to a USDW.	Occasional	0.0	1.0	2.0	3.0	6.0	\$308	\$0	20	118	\$6,054
Submit periodic updates of financial responsibility for closure that account for inflation.	Occasional	0.0	1.0	0.0	0.0	1.0	\$97	\$0	131	131	\$12,730
Report results of: any required mechanical integrity tests, other required tests, well workovers, or permit transfers.	Occasional	0.0	1.0	2.0	0.9	3.9	\$240	\$1,528	4	15	\$6,953
Recordkeeping Requirements (Per Facility)											
Maintain monitoring information, calibration & maintenance records, required reports, application data, and monitoring results.	At least 3 years	0.0	0.0	0.0	4.0	4.0	\$132	\$0	393	1,573	\$51,737
Closure Requirements (Per Well)											
Notify the Director before conversion or abandonment of the well or closure of the project.	One-time	0.0	0.5	0.0	1.0	1.5	\$81	\$0	1	2	\$81
TOTAL									6,636	112,846	\$ 39,234,131

Notes:

- (A) EPA assumes that occasional notification will be included in the next quarterly report except where required within 24 hours.
 - (B) EPA assumes that there are no start-up costs; all non-labor costs are O & M costs.
- EPA assumes one well per facility for start-up and closure activities; and 1.9 wells per facility for monitoring, testing and reporting.
Numbers may not add due to rounding.

Table A-1B (continued)
Annual Paperwork Burden and Costs Associated with Class I Nonhazardous Wells: States

		A	B	C	D	E			
		Hours and Costs per Response			Total Hours and Cost				
Description of Requirement	Frequency (A)	Unit Burden (B)	Unit Labor Cost	Unit Non-Labor Cost	Number of State Responses	Total State Hours/Year	Total State Cost/Year		
Initial/Start-up									
Permit applications									
Consider the permit application, AoR, relevant maps and cross sections, fluid injection rate and volume, proposed contingency plans, monitoring plans, and construction procedures as required at 146.14 and issue notice of intent to deny.	One-time	20.0	\$918	\$0	6	121	\$5,553		
Consider the permit application, AoR, relevant maps and cross sections, fluid injection rate and volume, proposed contingency plans, monitoring plans, and construction procedures as required at 146.14 and prepare draft permit.	One-time	40.0	\$1,837	\$0	54	2,177	\$99,951		
Provide public notice of issuance of a draft permit or intent to deny.	One-time	1.0	\$46	\$0	60	60	\$2,776		
Consider public comments.	One-time	6.0	\$276	\$0	60	363	\$16,659		
Issue final permit decision.	One-time	2.0	\$92	\$0	60	121	\$5,553		
Respond to comments.	One-time	7.0	\$321	\$0	60	423	\$19,435		
Review notice of completion of construction.	One-time	2.0	\$92	\$0	60	121	\$5,553		
Review information related to aquifer exemption requests and forward to EPA region.	One-time	1.0	\$46	\$0	10	10	\$472		
Permit renewals/modifications									
Review and respond to requests for permit modifications or re-issuance.	Occasional	30.0	\$1,378	\$0	17	497	\$22,820		
Monitoring/Testing									
Review casing pressure test and logs.	Every 5 years	4.0	\$184	\$0	65	261	\$11,962		
Review pressure fall-off test.	Annual	2.0	\$92	\$0	326	651	\$29,906		

Table A-1B (continued)
Annual Paperwork Burden and Costs Associated with Class I Nonhazardous Wells: States

		A	B	C	D	E			
		Hours and Costs per Response			Total Hours and Cost				
Description of Requirement	Frequency (A)	Unit Burden (B)	Unit Labor Cost	Unit Non-Labor Cost	Number of State Responses	Total State Hours/Year	Total State Cost/Year		
Review monitoring data submitted by operators.	Quarterly	2.0	\$92	\$0	1,303	2,605	\$119,624		
Other Reporting									
Respond to periodic notifications by owners and operators.	Occasional	1.0	\$46	\$0	8	8	\$380		
Closure									
Review plugging and abandonment report.	One-time	1.0	\$46	\$0	1	1	\$46		
TOTAL					2,092	#VALUE!	#VALUE!		

Notes:

(A) For quarterly activities, the number of responses = number of facilities X 4.

(B) EPA assumes one well per facility for start-up and closure activities; and 1.9 wells per facility for all other activities.

Regions review 17 percent of MITs and 23 percent of pressure fall-off tests in primacy states.

Numbers may not add due to rounding.

**Table A-2
Annual Paperwork Burden and Costs Associated with Class II Wells: Operators**

Description of Requirement	Frequency	Hours and Costs per Response					Total Hours and Costs			
		Legal	Managerial	Technical	Clerical	Unit Burden	Unit Labor Cost	Unit Non-Labor Cost	No. of Responses	Total Hours/Year
Initial/Start-up Requirements										
Requirements associated with permit applications (Per Permit Application)										
Read permit application directions.	One-time	0.0	0.0	0.5	0.5	1.0	\$44	\$0	5,956	5,832
Gather and submit: description of activities requiring a permit, facility name & address, SIC codes, ownership and facility status, facility location, listing of relevant permits or construction approvals, topographic maps, description of the business.	One-time	0.1	0.0	1.0	0.4	1.5	\$78	\$0	5,956	8,835
For DI programs, gather and submit a list of all land owners within one quarter mile of the facility boundary.	One-time	0.2	0.0	0.0	1.0	1.2	\$51	\$214	130	151
Prepare and submit plugging and abandonment plan.	One-time	0.0	0.6	4.8	0.6	6.0	\$346	\$0	5,956	35,574
Show evidence of financial responsibility for closure.	One-time	0.0	5.0	5.0	9.6	19.6	\$1,081	\$0	5,956	116,646
Prepare and submit proposed Corrective Action Plan.	One-time	0.0	0.3	2.9	0.2	3.4	\$198	\$0	596	2,020
Prepare and submit revised Corrective Action Plan.	One-time	0.0	1.0	9.6	0.7	11.3	\$658	\$0	119	1,343
Prepare and submit Area of Review map. (State/DI Program performs study)	One-time	0.0	0.0	1.0	0.0	1.0	\$56	\$42	1,324	1,324
Prepare and submit Area of Review map and study.	One-time	0.0	0.1	2.9	1.9	4.9	\$235	\$232	1,123	5,550
Prepare and submit proposed operating data.	One-time	0.0	0.1	1.8	0.1	2.0	\$114	\$0	5,956	11,887
Prepare and submit geological data on the injection and confining zone.	One-time	0.0	0.5	8.0	1.0	9.5	\$529	\$0	5,956	56,335
Prepare and submit name and depth to bottom of USDWs.	One-time	0.0	0.1	2.3	0.1	2.5	\$142	\$255	5,956	14,865
Prepare and submit schematic of the well.	One-time	0.0	0.0	2.8	0.2	3.0	\$163	\$0	5,956	17,819
Prepare and submit information to support an aquifer exemption request.	One-time	0.0	2.5	17.0	0.5	20.0	\$1,213	\$0	179	3,574

**Table A-2
Annual Paperwork Burden and Costs Associated with Class II Wells: Operators**

Description of Requirement	Frequency	Hours and Costs per Response					Total Hours and Costs			
		Legal	Managerial	Technical	Clerical	Unit Burden	Unit Labor Cost	Unit Non-Labor Cost	No. of Responses	Total Hours/Year
Requirements associated with completion reports (Per Well)										
Prepare and submit completion report.	One-time	0.0	0.0	1.5	1.8	3.3	\$142	\$0	5,658	18,439
Perform and report on appropriate logs and other tests during construction.	One-time	0.0	0.2	1.9	0.2	2.4	\$139	\$5,095	849	2,037
Demonstrate mechanical integrity.	One-time	0.0	0.0	7.0	0.0	7.0	\$393	\$229	5,658	39,607
Requirements associated with permit reviews/modifications (Per Permit/Per Operator)										
Respond to issues raised during permit review.	Every 5 years	0.0	0.5	2.0	0.5	3.0	\$177	\$0	1,593	4,778
Prepare and submit request for permit modification.	Occasional	0.0	0.4	2.8	0.8	4.0	\$222	\$0	773	3,092
Monitoring/Testing Requirements (Per Operator)										
Monitor the nature of injected fluids.	As necessary to obtain	0.0	0.0	2.0	0.0	2.0	\$112	\$51	63,708	127,415
Record injection pressure, flow rate, and cumulative volume.	At least every 30 days.	0.0	0.0	0.6	0.3	0.8	\$41	\$0	191,123	160,543
Demonstrate mechanical integrity.	Every 5 years	0.0	0.0	3.0	0.0	3.0	\$168	\$2,293	43,003	129,008
Reporting Requirements (Per Operator)										
Gather and submit groundwater monitoring data, analyses of injected fluids, a description of geologic strata, and other items as requested.	Annual	0.0	3.0	22.0	4.7	29.7	\$1,680	\$0	4,698	139,621
In DI programs, notify Regional Administrator 30 days prior to MIT.	Every 5 years	0.0	0.0	0.5	0.5	1.0	\$44	\$0	37	37
Notify Director of: any planned physical changes to facility, changes that may result in noncompliance, permit transfers, planned workovers, possible endangerment to a USDW.	Occasional	0.0	1.0	1.5	2.2	4.7	\$253	\$0	956	4,461
Report monitoring data, including monthly records of injected fluids, any changes in characteristics or sources of injected fluids.	Annual	0.0	0.0	3.3	1.7	5.0	\$242	\$0	15,927	79,635
Report MIT results.	Annual	0.0	0.0	1.0	0.0	1.0	\$56	\$0	15,927	15,927

**Table A-2
Annual Paperwork Burden and Costs Associated with Class II Wells: Operators**

Description of Requirement	Frequency	Hours and Costs per Response						Total Hours and Costs		
		Legal	Managerial	Technical	Clerical	Unit Burden	Unit Labor Cost	Unit Non-Labor Cost	No. of Responses	Total Hours/Year
Recordkeeping Requirements (Per Operator)										
Retain records of permitting data, nature and composition of injected fluids, and all monitoring results.	At least 3 years	0.0	0.0	1.0	3.0	4.0	\$155	\$0	15,927	63,708
Closure Requirements (Per Operator)										
In DI programs, notify director of revisions to plugging and abandonment plan.	One-time	0.0	0.5	2.5	1.0	4.0	\$222	\$0	0	1
Notify the Director before conversion or abandonment of the well, or in the case of area permits, before closure of the project.	One-time	0.0	1.0	0.0	2.0	3.0	\$163	\$0	1,044	3,132
In DI programs, submit a plugging and abandonment report within 60 days after plugging a well.	One-time	0.0	0.0	4.5	1.5	6.0	\$302	\$306	23	137
Other Requirements (Per Operator)										
In DI programs, submit revised demonstration of financial responsibility.	Occasional	0.0	0.5	0.5	1.0	2.0	\$110	\$0	35	70
TOTALS									418,056	1,073,400

Note: Numbers may not add due to rounding.

F
Costs
Total Cost/Year
\$260,892
\$466,298
\$34,429
\$2,062,464
\$6,440,656
\$117,966
\$78,324
\$130,462
\$524,287
\$677,797
\$3,148,909
\$2,361,959
\$972,703
\$216,659

F
Costs
Total Cost/Year
\$803,319
\$4,441,804
\$3,518,143
\$282,171
\$171,746
\$10,390,378
\$7,762,126
\$105,820,579
\$7,894,184
\$1,640
\$241,360
\$3,849,030
\$893,091

F
Costs
Total Cost/Year
\$2,465,013
\$51
\$170,102
\$13,847
\$3,809
\$ 166,216,198

Table A-2 (continued)
Annual Paperwork Burden and Costs Associated with Class II Wells: States

	A	B	C	D	E	
	Hours and Costs per Response			Total Hours and Cost		
Description of Requirement	Frequency	Unit Burden	Unit Labor Cost	Unit Non-Labor Cost	Number of Responses	Total Hours/Year
Initial/Start-up						
Permit applications (Per Permit Application)						
Review permit application and supporting documentation and prepare draft permit.	One-time	6.0	\$276	\$0	5,826	34,956
Consider public comments.	One-time	2.0	\$92	\$0	5,826	11,652
Issue final permit decision.	One-time	2.0	\$92	\$0	5,826	11,652
Respond to comments.	One-time	4.0	\$184	\$0	5,826	23,304
Review operator's AoR map and study.	One-time	5.0	\$230	\$0	1,099	5,493
Review operator's AoR map and perform AoR study.	One-time	2.5	\$115	\$0	1,324	3,310
Review completion report.	One-time	2.0	\$92	\$0	5,535	11,069
Review information related to aquifer exemption requests and forward to EPA region.	One-time	1.0	\$46	\$0	166	166
Permit reviews/modifications (Per Operator)						
Review each permit to determine whether it should be modified, revoked and reissued, or terminated.	Every 5 years	1.0	\$46	\$0	1,558	1,558
Review request for permit modification or re-issuance.	Occasional	4.0	\$184	\$0	756	3,024
Monitoring/Testing (Per Operator)						
Review mechanical integrity test data submitted by operators.	Every 5 years	0.5	\$23	\$0	42,064	21,032
Review monitoring data submitted by operators.	Annual	0.3	\$11	\$0	15,579	3,895
Recordkeeping						
Maintain administrative record in DI programs.	One-time	1.0	\$46	\$0	0	0

Table A-2 (continued)
Annual Paperwork Burden and Costs Associated with Class II Wells: States

	A	B	C	D	E	
	Hours and Costs per Response			Total Hours and Cost		
Description of Requirement	Frequency	Unit Burden	Unit Labor Cost	Unit Non-Labor Cost	Number of Responses	Total Hours/Year
Other Reporting (Per Operator)						
Respond to periodic notifications by owners and operators.	Occasional	2.0	\$92	\$0	935	1,869
Closure (Per Operator)						
For DI programs, review plugging and abandonment report.	One-time	1.0	\$46	\$0	0	0
TOTAL					92,358	132,980

Note: Numbers may not add due to rounding

F
Total Cost/Year
\$1,605,162
\$535,054
\$535,054
\$1,070,108
\$252,251
\$152,006
\$508,301
\$7,625
\$71,539
\$138,884
\$965,780
\$178,848
\$0

F
Total Cost/Year
\$85,847
\$0
\$6,106,460

**Table A-3
Annual Paperwork Burden and Costs Associated with Class III Wells: Operators**

Description of Requirement	Frequency	Hours and Costs per Response							No of Responses
		Legal	Managerial	Technical	Clerical	Unit Burden	Unit Labor Cost	Unit Non-Labor Cost	
Initial/Start-up Requirements									
Requirements associated with permit applications (Per Permit Application)									
Read permit application directions.	One-time	0.0	0.0	0.5	0.5	1.0	\$44	\$0	44
Gather and submit: a description of activities requiring a permit; facility name and address; SIC codes; ownership and facility status; facility location; and listing of relevant permits or construction approvals.	One-time	0.5	2.0	4.7	2.7	9.9	\$595	\$0	44
For DI programs, gather and submit a list of all land owners within one quarter mile of the facility boundary.	One-time	0.2	0.0	0.0	1.0	1.2	\$51	\$214	4.5
Prepare and submit plugging and abandonment plan.	One-time	0.0	0.0	6.4	1.5	7.9	\$407	\$0	44
Show evidence of financial responsibility for closure.	One-time	0.0	0.5	1.0	1.9	3.4	\$169	\$0	44
Prepare and submit proposed Corrective Action Plan.	One-time	0.0	2.0	10.0	1.9	13.9	\$819	\$0	44
Prepare and submit revised Corrective Action Plan.	One-time	0.0	1.0	8.0	1.0	10.0	\$578	\$0	0.9
Prepare and submit AoR map and study.	One-time	0.0	3.2	25.5	3.3	31.9	\$1,846	\$1,265	44
Prepare and submit maps and cross-sections of USDWs within AoR, local geology, and regional geology.	One-time	0.0	0.0	18.0	3.9	21.9	\$1,137	\$255	44
Prepare and submit proposed operating data, formation testing program, stimulation program, and injection procedure.	One-time	0.0	2.0	6.0	1.0	9.0	\$563	\$0	44
Prepare and submit schematic of the well.	One-time	0.0	0.0	4.2	0.8	5.0	\$261	\$0	44
Prepare and submit monitoring plan.	One-time	0.0	0.0	12.0	3.9	15.9	\$801	\$0	44
Prepare and submit information to support an aquifer exemption request.	One-time	0.0	2.5	17.0	0.5	20.0	\$1,213	\$0	0.4
Requirements associated with completion reports (Per Facility)					0.0				
Prepare and submit completion form and supporting documentation.	One-time	0.0	0.0	1.5	2.4	3.9	\$163	\$0	44
Prepare and submit reports of appropriate logs and tests during construction.	One-time	0.0	0.2	1.9	0.2	2.4	\$139	\$5,828	44
Demonstrate mechanical integrity.	One-time	0.0	16.1	128.7	15.5	160.2	\$9,288	\$81,956	44
Requirements associated with permit reviews/renewals/modifications (Per Permit/Per Facility)									
Respond to issues raised during permit review.	Every 5 years	0.0	3.0	1.0	0.0	4.0	\$347	\$0	60
Prepare and submit request for permit modification.	Occasional	0.0	2.0	22.0	4.0	28.0	\$1,560	\$0	1
Monitoring/Testing Requirements (Per Facility)									
Monitor the nature of injected fluids.	As necessary to obtain representative data	0.0	0.0	6.0	2.0	8.0	\$402	\$0	82
Monitor injection pressure and flow rate or volume of injected fluids, or meter and record injected and produced fluid volumes.	Semi-monthly/Continuous	0.0	0.0	3.3	1.3	4.6	\$229	\$0	7,800
Demonstrate mechanical integrity.	Every 5 years	0.0	16.1	128.7	16.1	160.9	\$9,308	\$81,956	16
Monitor the fluid level in the injection zone where appropriate and monitor parameters chosen to measure water quality in the monitoring wells.	Semi-monthly/monthly	0.0	0.0	27.5	3.0	30.5	\$1,641	\$0	476

**Table A-3
Annual Paperwork Burden and Costs Associated with Class III Wells: Operators**

Description of Requirement	Frequency	Hours and Costs per Response						Unit Labor Cost	Unit Non-Labor Cost	No of Responses
		Legal	Managerial	Technical	Clerical	Unit Burden	T			
Reporting Requirements (Per Facility)										
Notify Director of: any planned physical changes to facility, changes that may result in noncompliance, permit transfers, planned workovers, possible endangerment to a USDW.	Occasional	0.0	1.0	3.0	1.8	5.8	\$325	\$0	30	
Report to the Director on required monitoring, mechanical integrity tests, and other required tests.	Quarterly	0.0	1.0	10.0	16.9	27.9	\$1,212	\$0	1,200	
Recordkeeping Requirements (Per Facility)										
Retain records of permitting data, calibration and maintenance data, and monitoring results.	At least 3 years	0.0	0.0	0.4	3.0	3.4	\$121	\$0	300	
Closure Requirements (Per Facility)										
Notify the Director before conversion or abandonment of the well or in the case of area permits before closure of the project.	One-time	0.0	1.0	0.5	0.5	2.0	\$142	\$0	2	
In DI programs, submit a plugging and abandonment report within 60 days after plugging a well or at the time of the next quarterly report.	One-time	0.0	0.0	0.8	0.3	1.0	\$50	\$0	0	
Other Requirements (Per Facility)										
In DI programs, submit revised demonstration of financial responsibility.	Occasional	0.0	0.5	0.5	1.0	2.0	\$110	\$0	16	
TOTALS									10,562	

Note: Numbers may not add due to rounding.

E		F	
Total Hours and Costs			
Total Hours/Year		Total Cost/Year	
43		\$1,937	
436		\$26,194	
5		\$1,193	
346		\$17,897	
151		\$7,417	
613		\$36,033	
9		\$508	
1,404		\$136,871	
963		\$61,244	
395		\$24,758	
219		\$11,488	
699		\$35,232	
9		\$534	
172		\$7,180	
105		\$262,539	
7,051		\$4,014,719	
240		\$20,849	
28		\$1,560	
659		\$33,113	
36,152		\$1,787,838	
2,649		\$1,502,572	
14,512		\$780,665	

E		F	
Total Hours and Costs			
Total Hours/Year		Total Cost/Year	
175		\$9,760	
33,421		\$1,454,714	
1,020		\$36,338	
4		\$283	
0		\$10	
33		\$1,792	
101,513		\$ 10,275,236	

Table A-3 (continued)
Annual Paperwork Burden and Costs Associated with Class III Wells: States

	A	B	C	D	E	
	Hours and Costs per Response			Total Hours and Costs		
Program Oversight Activities	Frequency	Unit Burden	Unit Labor Cost	Unit Non-Labor Cost	Number of Responses	Total Hours/Year
Initial/Start-up						
Permit applications (Per Permit Application)						
Consider the permit application, area of review, relevant maps and cross sections, fluid injection rate and volume, proposed contingency plans, monitoring plans, and construction procedures and issue notice of intent to deny.	One-time	20.0	\$918	\$0	39	790
Consider the permit application, area of review, relevant maps and cross sections, fluid injection rate and volume, proposed contingency plans, monitoring plans, and construction procedures and prepare draft permit.	One-time	40.0	\$1,837	\$0	39	1,580
Provide public notice of issuance of a draft permit or intent to deny.	One-time	2.0	\$92	\$0	39	79
Consider public comments.	One-time	8.0	\$367	\$0	39	316
Issue final permit decision.	One-time	10.0	\$459	\$0	39	395
Respond to comments.	One-time	15.0	\$689	\$0	39	592
Review completion report.	One-time	2.0	\$92	\$0	39	79
Review information related to aquifer exemption requests and forward to EPA region.	One-time	1.0	\$46	\$0	0.0	0.0

Table A-3 (continued)
Annual Paperwork Burden and Costs Associated with Class III Wells: States

	A	B	C	D	E	
	Hours and Costs per Response			Total Hours and Costs		
Program Oversight Activities	Frequency	Unit Burden	Unit Labor Cost	Unit Non-Labor Cost	Number of Responses	Total Hours/Year
Permit reviews/modifications (Per Facility)						
Review each permit to determine whether it should be modified, revoked and reissued, or terminated.	Every 5 years	4.0	\$184	\$0	54	215
Review request for permit modification or re-issuance.	Occasional	20.0	\$918	\$0	1	20
Monitoring/Testing (Per Facility)						
Review mechanical integrity test data submitted by operators.	Every 5 years	0.5	\$23	\$0	54	27
Review monitoring data submitted by operators.	Quarterly	0.25	\$11	\$0	1,077	269
Other Reporting (Per Facility)						
Respond to periodic notifications by owners and operators.	Occasional	4.0	\$184	\$0	30	120
Recordkeeping (Per Facility)						
Maintain administrative record (DI).	One-time	4.0	\$184	\$0	0	0
Closure (Per Facility)						
Review plugging and abandonment report (DI only).	One-time	4.0	\$184	\$0	0	0
TOTAL					1,571	4,483

Note: Numbers may not add due to rounding.

F
Cost
Total Cost/Year
\$36,276
\$72,552
\$3,628
\$14,510
\$18,138
\$27,207
\$3,628
\$0

F
Cost
Total Cost/Year
\$9,893
\$918
\$1,237
\$12,367
\$5,510
\$0
\$0
\$ 205,865

Table A-4
Annual Paperwork Burden and Costs Associated with Class IV/Endangering Class V Wells: Operators

		A					B		C		D		E	
		Hours and Costs per Response						Total Hours and Costs						
Description of Requirement	Frequency	Legal	Managerial	Technical	Clerical	Unit Burden	Unit Labor Cost	Unit Non-labor Cost	No. of Responses	Total Hours/Year				
Closure Requirements (Per Well)														
Plug injection well.	One-time	0	0	7	1.5	8.5	\$247	\$0	71	601				
Prepare and submit pre-closure notification (Form 7520-17)	One-time	0	0	0.5	0.86	1.4	\$36	\$0	71	96				
TOTAL									142	698				

Note:
Numbers may not add due to rounding.

F
ts
Total Cost/Year
\$17,463
\$2,579
\$20,042

Table A-4 (continued)
Annual Burden and Costs Associated with Class IV/Endangering Class V V

		A	B	C	D
		Hours and Costs per Response			Tot
Description of Requirement	Frequency	Unit Burden (A)	Unit Labor Cost	Unit Nonlabor Cost	Number of Responses
Closure					
Review closure plan.	One-time	1.0	\$46	\$0	56
TOTAL					56

Note:

Numbers may not add due to rounding.

Vells: States

E		F	
al Hours and Cost			
Total Hours/Year		Total Cost/Year	
	56		\$2,549
	56		\$2,549

**Table A-5
Annual Paperwork Burden and Costs Associated with Class V Wells: Operators**

		A	B	C	D	E	F				
		Hours and Costs per Response									
Description of Requirement	Frequency	Legal	Managerial	Technical	Clerical	Unit Burden	Unit Labor Cost	Unit Non-labor Cost (A)	No. of Responses	Total Hours/Year	Total Cost/Year
Inventory Requirements											
Submit inventory information prior to commencing injection.	One-time	0.0	0.0	0.0	0.4	0.4	\$9	\$0	19,348	6,613	\$164,578
Permitting											
Prepare and submit permit application (if required). Gather and submit: AoR and corrective action information; geological data on the injection and confining zone and information about USDWs; descriptions of logs and tests; construction schematics; operating data; monitoring plan; and closure plan, including demonstration of financial responsibility.	One-time	7.0	17.3	61.8	17.5	103.6	\$3,541	\$104,711	10	1,036	\$1,082,518
Class V Rule - Ongoing Activities for Owners / Operators of Motor Vehicle Waste Disposal Wells											
Conduct quarterly injectate sampling.	Quarterly	0.0	0.0	1.0	0.5	1.5	\$42	\$785	5,916	8,874	\$4,892,179
Conduct annual sludge sampling (concurrent with injectate sampling).	Annual	0.0	0.0	1.0	0.5	1.5	\$42	\$2,051	1,479	2,219	\$3,096,727
Annual reporting and recordkeeping of all monitoring results.	Annual	0.0	0.0	3.0	1.0	4.0	\$115	\$0	1,479	5,916	\$169,600
TOTAL									28,232	24,657	\$9,405,602
Notes: (A) EPA assumes that there are no start-up costs; all non-labor costs are O & M costs. Numbers may not add due to rounding.											

Table A-5 (continued)
Annual Paperwork Burden and Costs Associated with Class V Wells: States

		A	B	C	D	E	F
		Hours and Costs per Response			Total Hours and Cost		
Description of Requirement	Frequency	Unit Burden (A)	Unit Labor Cost	Unit Nonlabor Cost	Number of Responses	Total Hours/Year	Total Cost/Year
Initial/Startup							
Review inventory information.	One-time	0.5	\$23	\$0	13,570	6,548	\$300,672
Review permit applications. Consider the permit application and attachments, prepare draft permit, solicit and respond to public comments.	One-time	56.0	\$2,572	\$0	10	560	\$25,715
Primacy State Activities Associated With the Class V Rule							
Review and file annual monitoring reports.	Annual	0.8	\$37	\$0	1,037	830	\$38,107
TOTAL					14,618	7,938	\$364,494
Notes: (A) Unit burdens for initial/start-up activities reported on a per-permit basis. Unit burden for other activities reported on a per-operator basis. Numbers may not add due to rounding.							

**Table A-6
Annual Paperwork Burden and Costs Associated with Class VI Wells: Operators**

Description Of Requirement	Frequency	Hours and Costs Per Response					Total Hours and	
		Technical 1 (Engineer)	Technical 2 (Geologist)	Unit Burden	Unit Labor Cost	Unit Non-Labor Cost (A)	Number of Responses	Total Hours/ Year
Initial/Startup Requirements (Per Permit Application)								
Requirements Associated with Permit Applications								
Prepare and submit Class VI permit application, including all attachments and plans.	One-Time	240	300	540	\$60,863	\$606,809	13.3	7,200
Conduct 3D seismic survey to identify faults and fractures; obtain and analyze seismic history.	One-Time	0	180	180	\$21,286	\$672,559	13.3	2,400
Obtain geomechanical and geochemical information on injection zone, subsurface aquifers including all USDWs, and the confining zone in the area of review.	One-Time	30	129	159	\$18,428	\$155,864	13.3	2,120
Develop maps and cross sections of the injection zone, subsurface aquifers including all USDWs, and the confining zone in the area of review.	One-Time	0	44	44	\$5,251	\$0	13.3	592
Take initial samples to develop a geochemical baseline for injection zones and confining zones.	One-Time	0	10	10	\$1,183	\$20,305	13.3	133
Prepare geologic characterization report demonstrating: suitability of receiving zone, storage capacity and injectivity, trapping mechanism free of nonsealing faults, competent confining system, etc.	One-Time	0	240	240	\$28,381	\$0	13.3	3,200
Demonstrate financial responsibility to ensure funds will be available for required future actions.	One-Time	40	0	40	\$4,231	\$0	13.3	533
Conduct aerial and database search for artificial penetrations (wells) within the area of review; determine integrity/plugging status of each.	One-Time	140	300	440	\$50,285	\$112,928	13.3	5,867
Perform complex modeling of CO2 fluid flow and migration (reservoir simulations) and prepare AoR and corrective action plan.	One-Time	724	1,200	1,924	\$218,489	\$0	13.3	25,653
Compile and submit information to support an injection depth waiver application.	One-Time	100	200	300	\$34,229	\$0	-	-

**Table A-6
Annual Paperwork Burden and Costs Associated with Class VI Wells: Operators**

Description Of Requirement	Frequency	Hours and Costs Per Response					Total Hours and	
		Technical 1 (Engineer)	Technical 2 (Geologist)	Unit Burden	Unit Labor Cost	Unit Non-Labor Cost (A)	Number of Responses	Total Hours/ Year
Requirements Associated with Injection Well Construction								
Design and install equipment for injection wells to measure: injected volumes, pressure, flow rates, and annulus pressure.	One-Time	0	0	0	\$0	\$443,863	13.3	0
Install check/shut-off valve on injection well.	One-Time	0	0	0	\$0	\$3,065	13.3	0
Construct monitoring wells.	One-Time	0	0	0	\$0	\$2,633,419	13.3	0
Design and install equipment for monitoring wells to measure: pressure, temperature, resistivity, salinity, CO2, and any other required parameters.	One-Time	0	0	0	\$0	\$188,821	13.3	0
Monitoring/Testing Requirements (Per Operator)								
Analyze injectate stream and perform corrosion monitoring.	Quarterly	62	0	62	\$6,505	\$18,113	10.7	656
Operate and maintain monitoring wells and the monitoring equipment within them.	Annual	13	0	13	\$1,325	\$513,498	2.7	33
Conduct periodic monitoring of groundwater quality and geochemistry.	Monthly	21	0	21	\$2,221	\$12,117	32.0	672
Conduct external mechanical integrity tests.	Annual	0	0	0	\$0	\$201,984	2.7	0
Conduct pressure fall-off testing.	Every Five Years	0	0	0	\$0	\$38,072	0.5	0
Conduct 3D seismic survey to track movement of the CO2 plume and pressure front.	Every Five Years	0	0	0	\$0	\$1,327,165	0.5	0
Activities Associated with Area of Review Reevaluations								
Conduct updated AoR modeling. Based on new results, update AoR and Corrective Action Plan, Testing and Monitoring Plan, and Emergency and Remedial Response Plan.	Every Five Years	1,118	0	1,118	\$118,258	\$0	0.3	373

**Table A-6
Annual Paperwork Burden and Costs Associated with Class VI Wells: Operators**

Description Of Requirement	Frequency	Hours and Costs Per Response					Total Hours and	
		Technical 1 (Engineer)	Technical 2 (Geologist)	Unit Burden	Unit Labor Cost	Unit Non-Labor Cost (A)	Number of Responses	Total Hours/ Year
Reporting and Recordkeeping Requirments (Per Operator)								
Report to regulators; maintain records of data from all data gathering activities.	Semi-Annual	33	0	33	\$3,491	\$0	5.3	176
Plugging, Post-Injection Site Care, and Site Closure Requirements (Per Operator)								
Demonstrate financial ability (accounting for inflation) to close site.	One-Time	8	0	8	\$846	\$0	0	0
Perform a MIT prior to plugging the injection well.	One-Time	0	0	0	\$0	\$38,636	0	0
Conduct ground water monitoring - operate and maintain monitoring wells and the monitoring equipment within them.	Annual	0	0	0	\$0	\$591,018	1	0
Track the CO2 plume and pressure front.	Every 5 Years	0	0	0	\$0	\$1,327,165	0	0
Submit results of post-injection monitoring.	Annual	40	0	40	\$4,231	\$0	1	40
Perform non-endangerment demonstration and submit results.	One-Time	400	0	400	\$42,310	\$0	0	0
TOTAL							230.3	49,649

Notes:
(A) Unit Non-Labor Cost inflated by 20% to account for G&A
Numbers may not add due to rounding.

F
Costs
Total Cost/Year
\$8,902,294
\$9,251,268
\$2,323,901
\$70,008
\$286,500
\$378,419
\$56,414
\$2,176,180
\$2,913,187
\$0

F
Costs
Total Cost/Year
\$5,918,179
\$40,871
\$35,112,257
\$2,517,618
\$ 262,591
\$1,372,861
\$458,818
\$538,623
\$20,305
\$707,821
\$39,419

F
Costs
Total Cost/Year
\$18,617
\$0
\$0
\$591,018
\$265,433
\$4,231
\$0
\$ 74,226,832

Table A-6 (continued)							
Annual Paperwork Burden and Costs Associated with Class VI Wells: States							
Description Of Requirement	Frequency	A	B	C	D	E	F
		Hours and Costs Per Response			Total Hours and Costs		
		Unit Burden	Unit Labor Cost	Unit Non-Labor Cost (A)	Number of Responses	Total Hours/Year	Total Cost/Year
Initial/Startup Requirements (Per Permit Application)							
Review the permit application and other information submitted by the operator, considering: AoR, relevant maps, site geology, formation testing results, well schematics and construction procedures, proposed injection procedure, status of corrective action on wells in the AoR, well logging, testing, and mechanical integrity data, and project plans.	One-time	780	\$35,818	\$0	5	3,900	\$179,088
Review financial responsibility demonstration.	One-time	100	\$4,592	\$0	5	500	\$22,960
Determine and specify tubing, packing, casing, and cementing requirements based on review of information submitted by operator.	One-time	140	\$6,429	\$0	5	700	\$32,144
Witness logging and testing.	One-time	20	\$918	\$0	5	100	\$4,592
Review applications for waivers to inject above the lowermost underground source of drinking water.	One-time	200	\$9,184	\$0	-	0.0	\$0
Monitoring and Recordkeeping							
Review reports submitted by operators; recordkeeping of data from all data gathering activities.	Annual	40	\$1,837	\$0	0.33	13	\$612
Review mechanical integrity test data.	Annual	13.5	\$620	\$0	0.33	5	\$207
Area of Review Reevaluation							
Review updated AoR modeling and updated plans.	Every 5 years	150	\$6,888	\$0	0.00	0	\$0
Post-Injection Site Care and Site Closure							
Review relevant data prior to granting approval for plugging and abandonment of a well.	One-time	20	\$918	\$0	0.00	0	\$0
Review post-injection monitoring data.	Annual	15	\$689	\$0	0.00	0	\$0
Review non-endangerment demonstration and authorize site closure.	One-time	40	\$1,837	\$0	0.00	0	\$0
Project-Independent Activities							
Prepare and submit primacy application.	One-time	1,040	\$47,757	\$0	1.7	1,733	\$79,595
TOTAL					22.3	6,951	\$ 319,198
Notes:							

Numbers may not add due to rounding.

**Table A-7
Annual State Burden and Cost for Program Oversight and Reporting**

Description of Requirement	Frequency	Hours and Costs per Response			Total Hours and Cost		
		Unit Burden	Unit Labor Cost	Unit Nonlabor Cost	Number of Responses	Total Hours/Year	Total Cost/Year
Program Oversight							
Oversee and implement UIC program in the State, for example, update regulations or guidances as needed.	Ongoing	1,040	\$47,757	\$0	59	61,360	\$2,817,651
7520 Forms Reporting							
Report on Permit Review and Issuance (7520-1)	Annual	4.5	\$207	\$0	59	266	\$12,192
Report on Compliance Evaluation (7520-2A)	Semi-annual	6.0	\$276	\$0	118	708	\$32,511
Report on Compliance Evaluation for Significant Non-Compliance (7520-2B)	Semi-annual	5.5	\$253	\$0	118	649	\$29,802
Report on Mechanical Integrity Tests/Remedial Action (7520-3)	Annual	5.0	\$230	\$0	59	295	\$13,546
Report on Quarterly Exceptions (7520-4)	Quarterly	2.0	\$92	\$0	236	472	\$21,674
Inventory Reporting							
Conduct inventory-related activities, e.g., review operator data and report to EPA's online inventory data system.	Annual	54	\$2,480	\$0	59	3,186	\$146,301
Total					767	66,936	\$3,073,678

Notes:
There may be more than one agency per state with Primacy authority.
Numbers may not add due to rounding.

Environmental Management - private

Small entities	28,801
Responses/ respond	12,38556
Annual frequency	1

Pct electronic: 38.8% All Class VI; some % of Class V inventory.

11. frequency - resp

	Respondents	Responses	Burden	Cost (O&M)	Time/ response	Annual hour burden	Cost/ response	Annual cost burden
Reporting	37,618	449,230	1,334,110	\$276,069,465	2.97	1,334,110	\$614.54	
Recordkeeping	37,618	16,693	66,839	\$0	4.00	66,839	\$0.00	
Third-party disclosu	0	0	0	\$0	0.00	0	\$0.00	
Total	37,618	465,923	1,400,950	\$276,069,465	3.01	1,400,950	\$592.52	#VALUE!

Allocate Change in Burden

	This ICR	Previously approved	Change	Due to new statute	Due to agency action	Due to Agency estimate	Due to Violation
Annual Responses	465,923	460,604	5,319	0	0	5,319	0
Annual Burden	1,400,950	1,141,294	259,656	0	-240	259,896	0
Annual Cost	\$276,069,465	\$168,345,558	\$107,723,907	\$0	\$0	\$107,723,907	\$0

The Approved numbers need to match what is on the "bottom line" in ICRAS - it can change between ICRs.

Environmental Management - state govt.

Small entities	0
Responses/ respond	1,901.52679
Annual frequency	1

Pct electronic: 100.0% Use of web-based data system

11. frequency - resp

Hour and Cost Burden

	Respondents	Responses	Burden	Cost (O&M)	Time/ response	Annual hour burden	Cost/ response	Annual cost burden
Reporting	59	112,131	#VALUE!	\$0	#VALUE!	#VALUE!	\$0.00	
Recordkeeping	59	59	0	\$0	0.00	0	\$0.00	
Third-party disclosu	0	0	0	\$0	0.00	0	\$0.00	
Total	59	112,190	#VALUE!	\$0	#VALUE!	#VALUE!	\$0.00	#VALUE!

Allocate Change in Burden

	This ICR	Previously approved	Change	Due to new statute	Due to agency action	Due to Agency estimate	Due to Violation
Annual Responses	112,190	96,765	15,425	0	16	15,409	0
Annual Burden	#VALUE!	150,966	#VALUE!	0	3,334	#VALUE!	0
Annual Cost	\$0	\$0	\$0	\$0	\$0	\$0	\$0

Environmental Management - federal govt.

Small entities	0
Responses/ respond	1,125.27854
Annual frequency	1

Pct electronic: 100.0% Use of web-based data system for DI

Hour and Cost Burden

	Respondents	Responses	Burden	Cost (O&M)	Time/ response	Annual hour burden	Cost/ response	Annual cost burden
Reporting	11	12,347	42,455	\$0	3.44	42,455	\$0.00	\$1,952,314
Recordkeeping	11	31	61	\$0	1.97	61	\$0.00	\$0
Third-party disclosu	0	0	0	\$0	0.00	0	\$0.00	\$0
Total	11	12,378	42,516	\$0	3.43	42,516	\$0.00	\$1,952,314

Allocate Change in Burden

	This ICR	Previously approved	Change	Due to new statute	Due to agency action	Due to Agency estimate	Due to Violation
Annual Responses	12,378	12,039	339	0	0	339	0
Annual Burden	42,516	17,835	24,681	0	0	24,681	0
Annual Cost	\$0	\$0	\$0	\$0	\$0	\$0	\$0

For part 1: annual cost to federal government: \$1,952,314

Total - all IC types (to compare)

	Respondents	Responses	Burden	Cost (O&M)	Total cost
Reporting	37,688	573,709	#VALUE!	\$276,069,465	
Recordkeeping	37,688	16,783	66,900	\$0	
Total	37,688	590,491	#VALUE!	\$276,069,465	#VALUE!
non-Fed total	37,677	578,113	#VALUE!	\$276,069,465	#VALUE!

Allocate Change in Burden

	This ICR	Approved	Change
Annual Responses	590,491	569,409	21,082
Annual Burden	#VALUE!	1,310,095	#VALUE!
Annual O&M Cost	\$276,069,465	\$168,345,558	\$107,723,907
non-Fed Resp	578,113	557,370	20,744
non-Fed Burden	#VALUE!	1,292,260	#VALUE!
non-Fed Cost	\$276,069,465	\$168,345,558	\$107,723,907

Environmental Management - private

10. Respondents	37,618	28,801	Blue numbers are entered into ICRAS; others are calculated	
Responses per respondent	12.385560987644	(small)		
Annual Freq:				
Annual responses/yr:				
14 - hour and cost burden				
	Time	Cost		
Reporting	2.8633699253424	592.52154061342		
Keeping	0.1434558438042	0		
Third party	0	0		

15. Allocate change	Total requested	Due to agency discretion (program change)	Due to Agency estimate	Approved
Responses	465,923	0	5,319	460,604
Hour burden	1,400,950	-240	259,896	1,141,294
Cost (O&M) burden	\$276,069,465	\$0	107,723,907	\$168,345,558

Environmental Management - state govt.

10. Respondents	59	
Responses per respondent	1901.5267886924	
Annual Freq:		
Annual responses/yr:		
14 - hour and cost burden		
	Time	Cost
Reporting	#VALUE!	0.000000000
Keeping	0	#VALUE!
Third party	0	#VALUE!
Total		

15. Allocate change	Total requested	Due to agency discretion	Due to Agency estimate	Approved
Responses	112,190	16.00	15,408.63	96,765
Hour burden	#VALUE!	3,334.00	#VALUE!	150,966
Cost (O&M) burden	\$0	0.00	0.00	\$0

Environmental Management - federal govt.

10. Respondents	11	
11. frequency	1125.2785416218	
Annual Freq:		
Annual responses/yr:		
14 - hour and cost burden		
	Time	Cost
Reporting	3.4298319793608	0.000000000
Keeping	0.0049153154424	0
Third party	0	0
Total		

15. Allocate change	Total requested	Due to agency discretion	Due to Agency estimate	Approved
Responses	12,378	0	339	12,039
Hour burden	42,516	0	24,681	17,835
Cost (O&M) burden	\$0	\$0	\$0	\$0

Total - all IC types

	Total requested	Due to agency discretion	Due to Agency estimate	Approved
Responses	590,491	16	21,066	569,409
Hour burden	#VALUE!	3,094	#VALUE!	1,310,095
Cost (O&M) burden	\$276,069,465	\$0	\$107,723,907	\$168,345,558

Information Collections - UIC Program

Update the aqua cells with last ICR's numbers; everything else here is linked.

Business area (Affected public)	Respondents	Small entities	Responses	Total burden	Reporting burden	Rkeeping burden	Labor\$	O&M\$	Capital\$
Env. Mgmt/Poll prev (Private sector - business)	37,618	28,801	465,923	1,400,950	1,334,110	66,839	#VALUE!	\$276,069,465	\$0
Env. Mgmt/Poll prev (State and local governments)	59	0	112,190	#VALUE!	#VALUE!	0	#VALUE!	\$0	\$0
Env. Mgmt/Poll prev (Federal government)	11	0	12,378	42,516	42,455	61	\$1,952,314	\$0	\$0
Total	37,688	28,801	590,491	#VALUE!	#VALUE!	66,900	#VALUE!	\$276,069,465	\$0

By IC Type-2021 ICR	Annual Burden	Labor Cost	O&M Cost	Total Cost	Responses	Respondents	
Env Mgmt - private	1,400,950	#VALUE!	\$276,069,465	#VALUE!	465,923	37,618	all operators
Env Mgmt - state	#VALUE!	#VALUE!	\$0	#VALUE!	112,190	59	all states
Env Mgmt - Federal	42,516	\$1,952,314	\$0	\$1,952,314	12,378	11	fed burden
Total	#VALUE!	#VALUE!	\$ 276,069,465	#VALUE!	590,491	37,688	

Small entity count - assumptions

50% of Class II are small businesses (ICR, Section 5c)

All Class V are small businesses (slight overstatement - ICR says "majority" are)

Recordkeeping (from tables)	responses	burden	non labor cost	
Class 1	466	1,936	\$0	Env mgmt - private
Class 2	15,927	63,708	\$0	Env mgmt - private
Class 3	300	1,020	\$0	Env mgmt - private
Class 4	0	0	\$0	Env mgmt - private
Class 5 (cannot disaggregate from rep)	0	0	\$0	Env mgmt - private
Class 6	5	176	\$0	Env mgmt - private
States as respondents	59	0	\$0	Env mgmt - state
Federal (Class 1, 2, 3 activities)	31	61	\$0	Env mgmt - federal
Rkeeping total	16,788	66,900	\$0	

2018 ICR Totals by type

	Annual Burden	Labor Cost	O&M Cost	Total Cost	Responses	Respondents
Env Mgmt - private	1,141,294	52,362,663	168,345,558	220,708,221	460,604	40,109
Env Mgmt - state	150,966	6,599,038	0	6,599,038	96,765	59
Env Mgmt - Federal	17,835	779,603	0	779,603	12,039	11
Total	1,310,095	\$ 59,741,304	\$ 168,345,558	\$ 228,086,862	569,409	40,179

The sum of these 2 rows shows on the OMB approval form

Change	This ICR Responses	This ICR Burden	This ICR O&M Cost	Approved Responses	Approved Burden	Approved O&M Cost	Change in Responses	Change in Burden	Change in Cost
Env Mgmt - private	465,923	1,400,950	\$276,069,465	460,604	1,141,294	\$168,345,558	5,319	259,656	\$107,723,907
Env Mgmt - state/local	112,190	#VALUE!	\$0	96,765	150,966	\$0	15,425	#VALUE!	\$0
Env Mgmt - Federal	12,378	42,516	\$0	12,039	17,835	\$0	339	24,681	\$0
Total	590,491	#VALUE!	276,069,465	569,409	1,310,095	168,345,558	21,082	#VALUE!	\$107,723,907

Non-Labor\$	Total\$
\$276,069,465	#VALUE!
\$0	#VALUE!
\$0	\$1,952,314
\$276,069,465	#VALUE!

(burden, O&M, responses)

03/01/2022; 10:18:30

**Exhibit 6-7A
Federal Burden and Cost for Reviewing Class I Hazardous Well Data**

#VALUE!

Description of Requirement	A					B					C					D				
	Frequency (A)	Unit Burden (B)	Number of Responses	Total Hours/Year	Total Cost/Year	Frequency (A)	Unit Burden (B)	Number of Responses	Total Hours/Year	Total Cost/Year	Frequency (A)	Unit Burden (B)	Number of Responses	Total Hours/Year	Total Cost/Year	Frequency (A)	Unit Burden (B)	Number of Responses	Total Hours/Year	Total Cost/Year
Initial/Start-up																				
Permit Applications																				
Consider the permit application, AoR, relevant maps and cross sections, fluid injection rate and volume, proposed contingency plans, monitoring plans, and construction procedures as required at 146.70 and prepare draft permit.	One-time	40	6	247.3	\$11,357															
Prepare and issue statement of basis (DI only).	One-time	1	6	6.2	\$284															
Develop and issue fact sheet.	One-time	4	0	0	\$0															
Provide public notice of issuance of a draft permit or intent to deny.	One-time	1	6	6.2	\$284															
Consider public comments.	One-time	6	6	37.1	\$1,704															
Issue final permit decision.	One-time	2	6	12.4	\$568															
Respond to comments.	One-time	7	6	43.3	\$1,987															
Review notice of completion of construction.	One-time	2	6	12.4	\$568															
Review information related to aquifer exemption requests and make a determination.	One-time	8	6.1	49.0	\$2,248															
No-Migration Petitions																				
Review and respond to petition request.	One-time	320	36	11,520.0	\$528,998															
Public notice/public comment.	One-time	144	36	5,184.0	\$238,049															
Review and respond to petition modification request.	One-time	100	6	600.0	\$27,552															
Permit renewals/modifications																				
Review and respond to requests for permit modifications or re-issuance.	Occasional	30	2	61.8	\$2,839															

Monitoring/Testing					
Review quarterly monitoring and testing results.	Quarterly	2	50	74.8	\$3,437
Review casing pressure test and radioactive tracer survey of bottom-hole cement.	Annual	4	18	72.6	\$3,336
Review casing pressure test, radioactive tracer survey of bottom-hole cement, and logs.	Every 5 years	4	2	10.0	\$458
Review pressure fall-off test.	Annual	2	47	94.7	\$4,350
Recordkeeping					
Maintain administrative record of permit decision.	One-time	1	6	6.2	\$284
Other Reporting					
Respond to periodic notifications by owners and operators.	Occasional	2	1	2.1	\$95
Closure					
Review closure and post-closure plans prior to approving plugging and abandonment.	One-time	2	0	0	\$0
Review closure report.	One-time	1	0	0	\$0
Witness and review pressure fall-off test prior to authorizing closure.	One-time	24	0	0	\$0
TOTAL			265	18,040	\$828,399
Notes: (A) For quarterly activities, the number of responses = number of facilities X 4. (B) EPA assumes one well per facility for start-up and closure activities; and 1.9 wells per facility for all other activities. Regions review 17 percent of MITs and 23 percent of pressure fall-off tests in primacy states. Numbers may not add due to rounding.					

Class I total

816

**Exhibit 6-7B
Federal Burden and Cost for Reviewing Class I Nonhazardous Well Data**

Description of Requirement	A B C E D					
	Frequency (A)	Unit Burden (B)	Number of Responses	Total Hours/Year	Total State Cost	Total Cost/Year
Initial/Start-up						
Permit applications						
Consider the permit application, AoR, relevant maps and cross sections, fluid injection rate and volume, proposed contingency plans, monitoring plans, and construction procedures as required at 146.14 and issue notice of intent to deny.	One-time	20.0	1.3	25.1	\$0	\$1,151
Consider the permit application, AoR, relevant maps and cross sections, fluid injection rate and volume, proposed contingency plans, monitoring plans, and construction procedures as required at 146.14 and prepare draft permit.	One-time	40.0	11	451.4	\$0	\$20,727
Prepare and issue statement of basis.	One-time	1.0	11	11.3	\$0	\$518
Develop and issue fact sheet.	One-time	4.0	0	0.0	\$0	\$0
Provide public notice of issuance of a draft permit or intent to deny.	One-time	1.0	11	11.3	\$0	\$518
Consider public comments.	One-time	6.0	11	67.7	\$0	\$3,109
Issue final permit decision.	One-time	2.0	13	25.1	\$0	\$1,151
Respond to comments.	One-time	7.0	13	87.8	\$0	\$4,030
Review notice of completion of construction.	One-time	2.0	13	25.1	\$0	\$1,151
Review information related to aquifer exemption requests and make a determination.	One-time	8.0	12	99.3	\$0	\$4,559
Permit renewals/modifications						
Review and respond to requests for permit modifications or re-issuance.	Occasional	30.0	3	103.1	\$0	\$4,732

Monitoring/Testing						
Review casing pressure test and logs.	Every 5 years	4.0	25	98.3	\$0	\$4,514
Review pressure fall-off test.	Annual	2.0	142	284.8	\$0	\$13,080
Review monitoring data submitted by operators.	Quarterly	2.0	270	540.2	\$0	\$24,806
Recordkeeping						
Maintain administrative record of permit decision.	One-time	1.0	13	12.5	\$0	\$576
Other Reporting						
Respond to periodic notifications by owners and operators.	Occasional	1.0	2	1.7	\$0	\$79
Closure						
Review plugging and abandonment report.	One-time	1.0	0	0.0	\$0	\$0
TOTAL			551	1,845	\$0	\$84,702
Notes: (A) For quarterly activities, the number of responses = number of facilities X 4. (B) EPA assumes one well per facility for start-up and closure activities; and 1.9 wells per facility for all other activities. Regions review 17 percent of MITs and 23 percent of pressure fall-off tests in primacy states. Numbers may not add due to rounding.						

Exhibit 6-8 Federal Burden and Cost for Reviewing Class II Well Data								
	A				B	C	D	
Description of Requirement	Frequency	Unit Burden	Unit Labor Cost	Unit Non-Labor Cost	Number of Responses	Total Hours/Year	Total Cost/Year	Notes

Initial/Start-up							
Permit applications (Per Permit Application)							
Review permit application and supporting documentation and prepare draft permit.	One-time	6.0	\$276	\$0	130	780	\$35,835
Consider public comments.	One-time	2.0	\$92	\$0	130	260	\$11,945
Issue final permit decision.	One-time	2.0	\$92	\$0	130	260	\$11,945
Respond to comments.	One-time	4.0	\$184	\$0	130	520	\$23,890
Review operator's AoR map and study.	One-time	5.0	\$230	\$0	53	267	\$12,271
Review operator's AoR map and perform AoR study.	One-time	2.5	\$115	\$0	0	0	\$0
Review completion report.	One-time	2.0	\$92	\$0	124	247	\$11,348
Review information provided by HF well operators to meet the DFHF Guidance recommendations.	One-time	25.0	\$1,148	\$0	0	0	\$0
Review information related to aquifer exemption requests and make a determination.	One-time	8.0	\$367	\$0	179	1,429	\$65,640
Permit reviews/modifications (Per Operator)							
Review each permit to determine whether it should be modified, revoked and reissued, or terminated.	Every 5 years	1.0	\$46	\$0	0	0	\$10
Review request for permit modification or re-issuance.	Occasional	4.0	\$184	\$0	17	68	\$3,101
Monitoring/Testing (Per Operator)							
Review mechanical integrity test data submitted by operators.	Every 5 years	0.5	\$23	\$0	4,206	2,103	\$96,578
Review monitoring data submitted by operators.	Annual	0.25	\$11	\$0	0	0	\$0
Recordkeeping (Per Operator)							
Maintain administrative record in DI programs.	One-time	1.0	\$46	\$0	2	2	\$97
Other Reporting (Per Operator)							
Respond to periodic notifications by owners and operators.	Occasional	2.0	\$92	\$0	0	0	\$12
Closure (Per Operator)							
For DI programs, review plugging and abandonment report.	One-time	1.0	\$46	\$0	0	0	\$11
TOTAL					\$ 5,112	\$ 5,938	\$ 272,682
Note: Numbers may not add due to rounding							

**Exhibit 6-9
Federal Burden and Cost for Reviewing Class III Well Data**

		A			B	C	D
Description of Requirement	Frequency	Unit Burden	Unit Labor Cost	Unit Non-Labor Cost	Number of Responses	Total Hours/Year	Total Cost/Year
Initial/Start-up							
Permit applications (Per Permit Application)							
Consider the permit application, area of review, relevant maps and cross sections, fluid injection rate and volume, proposed contingency plans, monitoring plans, and construction procedures and issue notice of intent to deny.	One-time	20	\$918	\$0	0	0	\$0
Consider the permit application, area of review, relevant maps and cross sections, fluid injection rate and volume, proposed contingency plans, monitoring plans, and construction procedures and prepare draft permit.	One-time	40	\$1,837	\$0	1	40	\$1,837
Prepare and issue statement of basis.	One-time	5	\$230	\$0	0	0	\$0
Develop and issue fact sheet.	One-time	3	\$138	\$0	0	0	\$0
Provide public notice of issuance of a draft permit or intent to deny.	One-time	2	\$92	\$0	2	4	\$184
Consider public comments.	One-time	8	\$367	\$0	2	16	\$735
Issue final permit decision.	One-time	10	\$459	\$0	2	20	\$918
Respond to comments.	One-time	15	\$689	\$0	2	30	\$1,378
Review completion report.	One-time	2	\$92	\$0	0	0	\$0
Review information related to aquifer exemption requests and make a determination.	One-time	8	\$367	\$0	0	3.52	\$162
Permit reviews/modifications (Per Facility)							
Review each permit to determine whether it should be modified, revoked and reissued, or terminated.	Every 5 years	4	\$184	\$0	1	4	\$184
Review request for permit modification or re-issuance.	Occasional	20	\$918	\$0	1	20	\$918
Monitoring/Testing (Per Facility)							
Review mechanical integrity test data submitted by operators.	Every 5 years	1	\$23	\$0	6	3	\$141
Review monitoring data submitted by operators.	Quarterly	0.25	\$11	\$0	123	31	\$1,409
Other Reporting (Per Facility)							

Respond to periodic notifications by owners and operators.	Occasional	4	\$184	\$0	1	4	\$184
Recordkeeping (Per Facility)							
Maintain administrative record (DI).	One-time	4	\$184	\$0	10	40	\$1,837
Closure (Per Facility)							
Review plugging and abandonment report (DI only).	One-time	4	\$184	\$0	0	0	\$0
TOTAL					161	215	\$ 9,886
Note: Numbers may not add due to rounding.							

**Exhibit 6-10
Federal Burden and Cost for Reviewing Class IV/High Priority Class V Well Data**

	A	B	C	D	
Description of Requirement	Frequency	Unit Burden	Number of Responses	Total Hours/Year	Total Cost/Year
Closure					
Review closure plan.	One-time	1.0	15	15	\$700
TOTAL			15	15	\$700

Note:
Numbers may not add due to rounding.

**Exhibit 6-11
Federal Burden and Cost for Reviewing Class V Well Data**

	A	B	C	D
Frequency	Unit Burden	Number of Responses	Total Hours/Year	Total Cost/Year
Program Oversight Activities				
Ongoing	0	10	0	\$0
Regulatory Requirements				
One-time	0.5	5,778	2,889	\$132,664
A Activities Associated with Class V Rule Requirements - DI States				
One-time	1.0	0	0	\$0
One-time	1.3	0	0	\$0
One-time	8.3	0	0	\$0
Annual	0.8	442	353	\$16,225
TAL		6,230	3,242	\$148,889

Notes:
Numbers may not add due to rounding.

Exhibit 6-11

Federal Burden and Cost for Reviewing Class VI Well Data

Description of Requirement	Frequency	A		Unit Labor Cost	Capital Costs (\$/response)	Unit Non-Labor Cost (A)	B C D		
		Unit Burden					Number of Responses	Total Hours/Year	Total Cost/Year
Program Oversight Activities									
Oversee and implement UIC program, for example, update regulations or guidances as needed.	Ongoing		\$0						
Initial/Startup Requirements (Per Permit Application)									
Review the permit application and other information submitted by the operator, considering: AoR, relevant maps, site geology, formation testing results, well schematics and construction procedures, proposed injection procedure, status of corrective action on wells in the AoR, well logging, testing, and mechanical integrity data, and project plans.	One-time	780	\$ 35,818	\$ -	\$ -	8.33	6500.0	\$ 298,480	
Review financial responsibility demonstration.	One-time	100	\$ 4,592	\$ -	\$ -	8.33	833.3	\$ 38,267	
Determine and specify tubing, packing, casing, and cementing requirements based on review of information submitted by operator.	One-time	140	\$ 6,429	\$ -	\$ -	8.33	1166.7	\$ 53,573	
Witness logging and testing.	One-time	20	\$ 918	\$ -	\$ -	8.33	166.7	\$ 7,653	
Review applications for waivers to inject above the lowermost underground source of drinking water.	One-time	200	\$ 9,184	\$ -	\$ -	-	0.0	\$ -	
Monitoring and Recordkeeping									
Review reports submitted by operators; recordkeeping of data from all data gathering activities.	Semi-annual	40	\$ 1,837	\$ -	\$ -	4.67	186.7	\$ 8,572	
Review mechanical integrity test data.	Annual	14	\$ 620	\$ -	\$ -	2.33	31.5	\$ 1,446	
Area of Review Reevaluation									
Review updated AoR modeling and updated plans.	Every 5 years	150	\$ 6,888	\$ -	\$ -	0.07	10.0	\$ 459	
Post-Injection Site Care and Site Closure									
Review relevant data prior to granting approval for plugging and abandonment of a well.	One-time	20	\$ 918	\$ -	\$ -	-	0.0	\$ -	
Review post-injection monitoring data.	Annual	15	\$ 689	\$ -	\$ -	1.0	15.0	\$ 689	
Review non-endangerment demonstration and authorize site closure.	One-time	40	\$ 1,837	\$ -	\$ -	-	0.0	\$ -	
Project Independent Activities									
Review primacy applications.	One-time	90.0	\$ 4,133	\$ -	\$ -	1.67	150.0	\$ 6,888	
TOTAL						43.1	9,060	\$ 416,028	
Notes: (A) Unit Non-Labor Cost inflated by 20% to account for G&A Numbers may not add due to rounding.									

	Env Mgmt - private	Env Mgmt - state	Env Mgmt - Federal
7520-1 Permit Review and Issuance/Wells in Area of Review		X	X
7520-2A Compliance Evaluation		X	X
7520-2B Compliance Evaluation - Significant Noncompliance		X	X
7520-3 Mechanical Integrity Test/Remedial Actions		X	X
7520-4 Quarterly Exceptions List		X	X
7520-6 UIC Permit Application	X		
7520-7 Application to Transfer Permit	X		
7520-8 Injection Well Monitoring report	X	X	
7520-11 Annual Disposal/Injection Well Monitoring Report	X		
7520-16 Inventory of Injection Wells	X		
7520-17 Pre-Closure Notification Form	X		
7520-18 Completion Form for Injection Wells	X		
7520-19 Well Rework, P&A Plan/Affidavit	X		

40 CFR 144	X	X	X
41 CFR 145	X	X	X
42 CFR 146	X	X	X
43 CFR 147	X	X	X
44 CFR 148	X	X	X

Hourly (24 -7)			
Hourly Bus (40 per week)			
Daily (7 per week)			
Daily Bus (5 per week)			
Weekly (52 per year)			
Monthly			
Yearly	X	X	X
Every Decade			
Quarterly	X	X	X
Semi-annually		X	X
Biennially			
Other (Describe <u>every 5 yrs</u>)	X		