

**Supporting Statement A**  
**30 CFR 550, Subpart B – Plans and Information**  
**BOEM Forms 0137, 0138, 0139, 0141, 0142, and NTLs**  
**OMB Control Number 1010-0151**  
**Current Expiration Date: August 31, 2023**

**General Instructions**

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question, "Does this information collection request (ICR) contain surveys, censuses, or employ statistical methods?" is checked "Yes," then a Supporting Statement B must be completed. The Office of Management and Budget (OMB) reserves the right to require the submission of additional information with respect to any request for approval.

**Justification**

***1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.***

The Outer Continental Shelf (OCS) Lands Act, as amended (43 U.S.C. § 1331 *et seq.* and 43 U.S.C. § 1801 *et seq.*), authorizes the Secretary of the Interior to prescribe rules and regulations to administer leasing of mineral resources on the OCS. Such rules and regulations apply to all operations conducted under a lease, pipeline right-of-way, lease-term pipeline, or a right-of-use and easement.

Sections 11 and 25 of the amended OCS Lands Act require the holders of OCS oil and gas or sulfur leases to submit Exploration plans (EPs) and Development and Production Plans (DPPs) to the Secretary for approval prior to commencing these activities. Section 1332(6) states that "operations in the [O]uter Continental Shelf should be conducted in a safe manner by well-trained personnel using technology, precautions, and techniques sufficient to prevent or minimize . . . occurrences which may cause damage to the environment or to property, or endanger life or health." Section 1334(a)(8) requires that regulations prescribed by the Secretary include provisions "for compliance with the national ambient air quality standards [NAAQS] pursuant to the Clean Air Act (42 U.S.C. 7401 *et seq.*), to the extent that activities authorized under this subchapter [Act] significantly affect the air quality of any State."

This authority and responsibility have been delegated to the BOEM, which administers these provisions in accordance with its regulations at 30 CFR Part 550, Subparts A, B, and C. BOEM regulations require the submission of information on projected air emissions with each proposed plan for exploration or development of oil, gas, or sulfur on the OCS.

As a Federal agency, we also have a continuing affirmative duty to comply with the National Environmental Policy Act (NEPA), Endangered Species Act (ESA), the Marine Mammal Protection Act (MMPA), the Magnuson-Stevens Fishery Conservation and Management Act,

and the National Historic Preservation Act (NHPA). This includes a substantive duty to carry out any agency action in a manner that is not likely to jeopardize protected species as well as a procedural duty to consult with the Fish and Wildlife Service (FWS) and National Oceanic and Atmospheric Administration Fisheries (NOAA Fisheries) before engaging in a discretionary action that may affect a protected species.

The Independent Offices Appropriations Act (31 U.S.C. 9701), the Omnibus Appropriations Bill (Pub. L. 104-133, 110 Stat. 1321, April 26, 1996), and OMB Circular A-25, authorize Federal agencies to recover the full cost of services that confer special benefits. Several requests for approval required in Subpart B are subject to cost recovery, and BOEM regulations specify service fees for these requests.

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

***2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.***

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

In general, BOEM uses the information collected to ensure that:

- There is no threat of serious, irreparable, or immediate damage to the marine environment caused by OCS oil and gas exploration, development, and production activities;
- Operations are conducted according to all applicable regulations, permit conditions and requirements, and in a safe and workmanlike manner;
- OCS oil and gas operations are conducted in a manner that minimizes air pollution from the OCS in adjacent onshore areas and do not exceed required emission levels for key pollutants; and

- Air emissions and related information comply with the NAAQS and regional haze regulations.

**BOEM-0138 (EP - Air Quality) and BOEM-0139 (DOCD/DPP – Air Quality):** These forms are designed to standardize the way potential air emissions are estimated and approved as part of the OCS plan. BOEM uses the data from these forms to estimate the amount of air emissions from offshore oil and gas activities. These forms consist of:

- title, factors, emissions pages,
- summary page that describes and calculates the estimated emissions from an activity annually,
- a list of appropriate emissions factors to be used in calculating the proposed air emissions for various types of equipment,
- a list of key operational activities, such as drilling or production,
- location information applicable to all facilities,
- information on ratings, fuel consumption, and run time, and
- a distribution of estimated air pollutant outputs, by type of activity and type of equipment.

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

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

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

***New & Revised Information requested for 2020 BiOp:***

The “*Biological Opinion on the Federally Regulated Oil and Gas Program Activities in the Gulf of Mexico*” (Consultation Number FPR-2017-9234) dated March 13, 2020 (amended in 2021; hereafter referred to as the BiOp) covers all activities associated with the OCS oil and gas program in the Gulf of Mexico through approximately 2029. The 2020 NMFS BiOp and 2021 Amended ITS and Revised Appendices address the impacts to and incidental take of ESA-listed species as a result of BOEM- (and Bureau of Safety and Environmental Enforcement (BSEE))-authorized activities related to new oil and gas lease sales and any future oil and gas approvals after March 13, 2020, under both existing and future OCS oil and gas leases in the GOM, for the ten years following issuance of the BiOp. Compliance with the relevant terms and conditions, reasonable and prudent measures, reasonable and prudent alternative for the Rice’s whale (formerly the GOM Bryde’s whale), the Notification of Intention to Transit Rice’s Whale Area COA, and protocols from the 2020 NMFS BiOp and 2021 Amended ITS and Revised Appendices necessitated updates to the information requested of operators and provided in the appendices attached to plan submittals. Certain post-lease approvals (e.g., for activities involving

new and unusual technologies, equipment involving entanglement risks, and all ancillary geological and geophysical (G&G) surveys) require step-down review with NMFS and may require additional information to fully assess the potential for impacts to protected species. The BiOp and incidental take statement (ITS) requires certain mitigative measures and reporting for compliance with the Endangered Species Act. BOEM uses the information in the operator's submittals (e.g., BOEM-0137) to determine which mitigations are necessary. This information indicates the presence of certain stressors or risks to protected species, including the use of:

- slack lines or other entanglement risks in the water;
- new and unusual technology;
- vessels with moon pools;
- vessel transit paths; and
- sound sources.

There was an increase in effort following the implementation of the BiOp and associated information requests, primarily as a result of revision or supplementation of submittals to BOEM. As operators became familiar with the BiOp and the information needed to evaluate proposed activities, the burden returned to previous levels and revision, or supplementation requests are now uncommon.

***Benthic Biological Reviews:*** For the majority of submittals that include bottom-disturbing activities, BOEM performs a benthic review to ensure impacts to sensitive, benthic communities are avoided. To perform these reviews, seafloor survey information is required at a resolution sufficient to determine the presence of hard bottom habitat at least 3 feet by 3 feet in area. The seafloor survey information and analysis operators provide BOEM (in compliance with 30 CFR § 550.216 and 30 CFR § 550.247) is used to characterize benthic habitats and assess the potential for adverse impacts as a result of proposed activities. If the data and analysis provided are insufficient to complete the assessment or if the operator is requesting a departure from existing guidance, BOEM may request additional information about the seafloor, especially regarding sensitive, benthic habitats and communities which rely upon them. The types of information requested include high resolution surveys, proposed methods for avoiding benthic disturbance, and distances of activities from potential, sensitive benthic features.

BOEM (and BSEE) continue to implement the 2020 BiOp and 2021 Amended Incidental Take Statement (ITS) and follow an adaptive management process in developing information to meet monitoring and reporting requirements. BOEM (and BSEE) coordinate with NMFS to develop standard conditions of approval (COAs). BOEM (and BSEE) will work with NMFS to determine the specific information needed to meet NMFS' requirements, the manner of collection, and format for collected data collected. A formal process and data collection form have not yet been finalized.

***BOEM-0141—ROV Survey Report*** is submitted to report the observations and information recorded from two sets of remotely operated vehicle (ROV) monitoring surveys to identify high-density benthic communities that may occur on the seafloor in deep water. The form asks respondents for general operator/facility information and a transect drawing of the survey

pattern made by the ROV; a recording and transcript of what was visualized at the bottom throughout deployment (the form includes a guide to animal groups and a guide to physical features), and any additional imagery that helps depict bottom conditions. We use the information when such areas are found to help design mitigation measures to avoid these areas and to help assess the effectiveness of avoidance criteria.

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

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.**

Currently, 95 percent of all information is submitted electronically. However, because of the various types of information submitted with the plans (maps, surveys, spreadsheets, etc.), some of the submission may not readily lend itself to electronic commerce. In some instances, paper copies of the non-proprietary information submitted in the plans and accompanying information may continue to be necessary for review by States, local governments, and the public.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

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

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

In the area of air quality, authority to regulate OCS air emissions is split between the Department of the Interior (DOI) and the Environmental Protection Agency (EPA). This split in the jurisdiction related to the monitoring of air quality is a result of the 1990 amendments to the Clean Air Act (Pub. L. 101-549). Specifically, section 328 gives EPA the authority to regulate OCS air emissions for OCS areas except in the Central and Western Gulf of Mexico and in the Arctic OCS.

There is no duplication of effort with respect to reporting or analysis of air emissions because the EPA regulates emissions on some of the OCS and DOI regulates the air emissions for other parts of the OCS. In addition, DOI provides the data it collects to the EPA for their use in populating the national emissions inventory. These regulations are effective in avoiding duplication in Federal regulations and reporting. Similar information is not available because the information is unique for each emission source and data and information cannot be obtained elsewhere.

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

Many of the OCS lessees and operators have less than 500 employees and are considered small businesses, as defined by the Small Business Administration. This collection of information could have a significant economic effect on a substantial number of small entities. However, the activities to which this information collection applies are subject to statutorily mandated controls designed to protect the environment and ensure that the air quality of potentially affected States is not adversely affected by OCS activities. The hour burden on any small entity subject to these regulations cannot be reduced beyond current levels without impairing the ability of the agency to comply with its statutory mandates.

***6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.***

If BOEM did not collect the information, we could not carry out the mandate of the OCS Lands Act, as amended, which specifies that exploration or development and production activities on the OCS may not be conducted until comprehensive plans are submitted and approved. Extensive data and information are necessary to make informed decisions on whether to approve these plans or require appropriate changes.

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

BOEM would not have the ability to determine if OCS operations comply with standards to minimize air pollution and avoid causing a significant adverse effect to adjacent onshore areas if we did not collect this information. BOEM's failure to collect this information would also adversely affect the States, as the emissions of air pollutants generated on the OCS could adversely affect their ability to comply with the federally mandated State Implementation Plans with respect to maintaining onshore ambient air quality levels in compliance with EPA standards.

The information collected is unique to each facility. Except for the information discussed in section A.7, the frequency is generally on the occasion of a proposed plan; thus, a lesser frequency is not possible.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

**(a) requiring respondents to report information to the agency more often than quarterly;**

Per the 2020 BiOp, BOEM (and BSEE) currently requires marine mammal observation and monitoring reports be submitted once monthly and a final PSO report must be submitted within 90 days of the completion of a survey effort or expiration of the MMPA authorization. If a protected species is observed within an enclosed moon pool the operator must report the observation within 24 hours and daily after that for as long as the animal remains within the moon pool.

There are also some occasions in which immediate reporting is required for ESA compliance:

- Vessel crews must report sightings of any injured or dead protected species (marine mammals and sea turtles) immediately to the NOAA Fisheries Stranding Hotline at (877) 433-8299.
- If an operator makes an unplanned transit through the highly-endangered Rice's whale area (defined in the [BiOp](#)) or if transiting through this area without abiding by prescribed measures to reduce potential effects to protected species. Immediate reporting would be required if, when transiting through the Rice's whale area, vessel speeds exceeded 10 knots, minimum separation distances were not maintained, or transits were made during periods of low visibility.
- Entanglement or entrapment of a protected species (i.e., an animal is entangled in a line or cannot or does not leave a moon pool of its own volition).
- Injury of a protected species (e.g., the animal appears injured or lethargic). Interaction, or contact with equipment by a protected species. The report must include the following information:
  - Time, date, water depth and location (latitude/longitude) of the first discovery (and updated location information if known and applicable);
  - Relevant weather conditions (e.g., cloud cover, fog, sun glare, etc.);
  - Name, type, call sign, and speed of the vessel during and leading up to the first sighting;
  - Species identification (if known) or description of the animal(s) involved;
  - Condition of the animal(s) (including carcass condition if the animal is dead);
  - Observed behaviors of the animal(s), if alive;
  - If available, photographs or video footage of the animal(s); and
  - General circumstances under which the animal was discovered.
- Any observation of a leatherback sea turtle within a moon pool (regardless of whether it appears injured, or an interaction with equipment or entanglement/entrapment is observed).

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

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

Per the 2020 BiOp, BOEM (and BSEE) currently requires marine mammal observation and monitoring reports be submitted once monthly. The BiOp replaced NTL 2016-G02 which required bi-monthly reporting.

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

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

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

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

***(e) in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;***

Not applicable in this collection.

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

Not applicable in this collection.

***(g) that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are***



***consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or***

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

***(h) requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.***

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

***8. If applicable, provide a copy and identify the note and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past 3 years and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.***

***Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.***

***Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.***

As required in 5 CFR 1320.8(d), BOEM provided a 60-day notice in the *Federal Register* on March 3, 2023 (88 FR 13459). One comment was received that offered their support of the Federal government.

During the comment period, BOEM requested input from several respondents on the availability of data, frequency of collection, clarity of instructions, and elements being collected. Responses to our outreach effort were minimal, but respondents agreed with our burden hour estimates.

Anadarko Petroleum Company  
(832) 636-1554  
Regulatory Coordinator  
1201 Lake Robbins Drive  
The Woodlands, TX 77350

Arena Offshore  
(281) 210-3180  
Regulatory Coordinator  
4200 Research Forest Drive  
Suite 230  
The Woodlands, TX 77381

BP  
(281) 773-9088  
Senior Compliance Advisor / Gulf of Mexico  
501 Westlake Park Boulevard  
Houston, TX 77079

Chevron North America Exploration & Production  
(985) 773-1734  
Regulatory Engineer  
100 Northpark Boulevard  
Covington, LA 70433

LLOG Exploration Offshore, L.L.C.  
(985) 801-4356  
Engineering Technician  
1001 Ochsner Boulevard  
Suite 100  
Covington, LA 70433

Shell Offshore Inc.  
(504) 245-4537  
Subsurface Regulatory/Regulatory Coordinator  
P.O. Box 61933  
New Orleans, LA 70161-1933

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

We will not provide payment or gifts to respondents in this collection.

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

BOEM will protect proprietary information according to 30 CFR 550.197, "Data and information to be made available to the public or for limited inspection," and the Freedom of Information Act (5 U.S.C. 552) and its implementing regulations (43 CFR 2).

***11. Provide additional justification for any questions of a sensitive nature, such as sexual***

*behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.*

The collection does not include sensitive or private questions.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

*(a) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.*

*(b) If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.*

Potential respondents include Federal oil, gas, and sulfur lessees and/or operators and States. It should be noted that not all of the potential respondents submit information in any given year, and some may submit multiple times. The burden estimates include the time for reviewing the instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. Submissions are generally on occasion, semi-monthly, and vary by section. We estimate the total annual burden is 436,438 hours.

**BURDEN BREAKDOWN**

Citation 30 CFR 550 Subpart B and NTLs	Reporting & Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Burden Hours
		Non-Hour Costs		
200 thru 206	General requirements for plans and information; fees/refunds, etc.	Burden included with specific requirements below.		0
201 thru 206; 211 thru 228; 241 thru 262	BOEM posts EPs/DPPs/DOCDs on FDMS and receives public comments in preparation of EAs.	Not considered IC as defined in 5 CFR 1320.3(h)(4).		0
204	For Arctic OCS Exploration activities: submit IOP, including all required information.	2,880	1 response	2,880 hours
		<b>Subtotal</b>	<b>1 response</b>	<b>2,880 hours</b>
<b>Ancillary Activities</b>				

Citation 30 CFR 550 Subpart B	Reporting & Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Burden Hours
		Non-Hour Costs		
208; NTL 2009- G34*	Notify BOEM in writing, and if required by the Regional Supervisor notify other users of the OCS before conducting ancillary activities.	11	40 notices	440
208; 210(a)	Submit report summarizing & analyzing data/information obtained or derived from ancillary activities.	2	40 reports	80
208; 210(b)	Retain ancillary activities data/information; upon request, submit to BOEM.	2	40 records	80
<b>Subtotal</b>			<b>120 responses</b>	<b>600 hours</b>
<b>Contents of Exploration Plans (EP)</b>				
209; 231(b); 232(d); 234; 235; 281; 283; 284; 285; NTL 2015- N01*	Submit new, amended, modified, revised, or supplemental EP, or resubmit disapproved EP, including required information; withdraw an EP.	150	205 changed plans	30,750
209; 211 thru 228; NTL 2015-N01*; NTL 2022- N01	Submit EP and all required information (including, but not limited to, submissions required by BOEM Forms 0137, 0138, 0142; lease stipulations; reports, including shallow hazards surveys, H2S, G&G, archaeological surveys & reports (550.194)**), in specified formats. Provide notifications.	600	95	57,000
			\$4,348 x 95 EP surface locations = \$413,060	
220**	For Arctic OCS exploration activities: submit required Arctic-specific information with EP.	350	1	350
220**	For existing Arctic OCS exploration activities: revise and resubmit Arctic-specific information, as required.	700	1	700
<b>Subtotal</b>			<b>302 responses</b>	<b>88,800 hours</b>
			<b>\$413,060 non-hour costs</b>	
<b>Review and Decision Process for the EP</b>				
235(b); 272(b); 281(d) (3)(ii)	Appeal State's objection.	Burden exempt as defined in 5 CFR 1320.4(a)(2), (c).		0
<b>Contents of Development and Production Plans (DPP) and Development Operations Coordination Documents (DOCD)</b>				
209; 266(b); 267(d); 272(a); 273; 281; 283; 284; 285; NTL 2015-N01*	Submit amended, modified, revised, or supplemental DPP or DOCD, including required information, or resubmit disapproved DPP or DOCD.	235	275 changed plans	64,625
241 thru 262; 209; NTL 2015-N01*; NTL 2022- N01	Submit DPP/DOCD and required/supporting information (including, but not limited to, submissions required by BOEM Forms 0137, 0139, 0142; lease stipulations; reports, including shallow hazards surveys, archaeological surveys & reports (CFR 550.194)), in specified formats. Provide notification.	700	180	126,000
			\$5,017 x 180 DPP/DOCD wells = \$903,060.	
<b>Subtotal</b>			<b>455 responses</b>	<b>190,625</b>

Citation 30 CFR 550 Subpart B	Reporting & Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Burden Hours
		Non-Hour Costs		
				hours
				\$903,060 non-hour costs
<b>Review and Decision Process for the DPP or DOCD</b>				
267(a)	Once BOEM deemed DPP/DOCD submitted; Governor of each affected State, local government official; etc., submit comments/recommendations.	Not considered IC as defined in 5 CFR 1320.3(h)(4)		0
267(b)	General public comments/recommendations submitted to BOEM regarding DPPs or DOCDs.	Not considered IC as defined in 5 CFR 1320.3(h)(4).		0
269(b)	For leases or units in vicinity of proposed development and production activities RD may require those lessees and operators to submit information on preliminary plans for their leases and units.	3	1 response	3
		<b>Subtotal</b>	<b>1 response</b>	<b>3 hours</b>
<b>Post-Approval Requirements for the EP, DPP, and DOCD</b>				
280(b)	In an emergency, request departure from your approved EP, DPP, or DOCD.	Burden included under 1010-0114.		0
281(a)	Submit various BSEE applications for approval and submit permits.	Burdens included under appropriate subpart or form (1014-0003; 1014-0011; 1014-0016; 1014-0018).		0
282	Retain monitoring data/information; upon request, make available to BOEM.	4	150 records	600
	Prepare and submit monitoring plan for approval.	2	6 plans	12
282(b)	Prepare and submit monitoring reports and data (including BOEM Form 0141 used in GOMR).	3	12 reports	36
284(a)	Submit updated info on activities conducted under approved EP/DPP/DOCD.	4	56 updates	224
		<b>Subtotal</b>	<b>224 responses</b>	<b>872 hours</b>
<b>Submit CIDs</b>				
296(a); 297	Submit CID and required/supporting information; submit CID for supplemental DOCD or DPP.	100	17 documents	1,700
		$\$32,372 \times 17 = \$550,324$		
296(b); 297	Submit a revised CID for approval.	50	8 revisions	400
		<b>Subtotal</b>	<b>25 responses</b>	<b>2,100 hours</b>
		<b>\$550,324 non-hour costs</b>		
<b>Seismic Survey Mitigation Measures and Protected Species Observer Requirements</b>				
211 thru 228; 241 thru 262	Submit to BOEM observer training requirement materials and information.	1.5 hours	2 sets of material	3
	Training certification and recordkeeping.	1 hour	1 new trainee	1
	During seismic acquisition operations, submit monthly observer reports.	1.5 hours	100 reports	150
	Submit final PSO report upon completion of seismic survey effort.	2 hours	25 reports	50
	Observation Duty (3 observers fulfilling an 8-hour shift each for 365 calendar days x 4 vessels = 35,040 man-hours). This requirement is contracted out; hence the non-hour cost burden.	3 observers x 8 hours x 365 days = 8,760 hours x 4 vessels observing = 35,040 hours x \$52/hour = \$1,822,080.		

Citation 30 CFR 550 Subpart B	Reporting & Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Burden Hours
		Non-Hour Costs		
		Subtotal	128 responses	204 hours
			\$1,822,080 non-hour costs	
<b>Vessel Strike Avoidance and Injured/Protected Species Reporting</b>				
211 thru 228; 241 thru 262	Notify BOEM within 24 hours (and daily thereafter) if a protected species is observed within an enclosed moon pool for as long as the individual remains within the moon pool.	1 hour	5 notices	5
211 thru 228; 241 thru 262	Immediately report: <ul style="list-style-type: none"> <li>Sightings of any injured or dead protected species.</li> <li>Unapproved transits through the Rice's whale area.</li> <li>If vessel speeds exceeded 10 knots, minimum separation distances were not maintained, or transits were made during periods of low visibility in the Rice's whale area.</li> <li>Entanglement or entrapment of a protected species.</li> <li>Interaction, or contact with equipment by a protected species.</li> <li>Any observation of a leatherback sea turtle within a moon pool.</li> </ul>	1 hour	5 notices	5
		Subtotal	10 responses	10 hours
<b>General Departure</b>				
200 thru 299	General departure and alternative compliance requests not specifically covered elsewhere in Subpart B regulations.	2	25 requests	50
		Subtotal	25 responses	50 hours
		<b>TOTAL BURDEN</b>	1,291 responses	286,144 hours
			\$3,688,524 non-hour costs	

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

\*\*Archaeological surveys and reports required under 30 CFR 550, subpart A in 550.194(a) are generally part of the geohazard survey report required under 30 CFR 550, subpart B. On average it takes an archaeologist 35 hours to prepare the archaeological survey and report. This hour burden is included in the overall hour burden estimate for submission of EPs and all required information.

***(c) Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under "annual Cost to the Federal Government."***

The average respondent cost is \$100/hour (rounded). This cost is broken out in the below table using the Bureau of Labor Statistics data for the Houston, TX area. See BLS website:

[https://www.bls.gov/oes/current/oes\\_26420.htm](https://www.bls.gov/oes/current/oes_26420.htm).

Position	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.4** x \$/hour)	Percent of time spent on collection	Weighted Average (\$/hour)
Secretaries and Administrative assistants (43-6011)	\$37	\$52	15%	\$8
Petroleum Engineers, Geologists (17-2171)	\$77	\$108	70%	\$76
Supv. Engineer (17-2171)	\$77	\$108	15%	\$16
<b>Weighted Average (\$/hour)</b>				<b>\$100</b>

\* Note that this BLS source reflects their last update from May 2023.

\*\* A multiplier of 1.4 (as implied by BLS news release USDL-23-0488, March 17, 2023 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

Based on a cost factor of \$ per hour, we estimate the total annual cost to industry as a dollar equivalent is \$28,614,400 (\$100 x 286,144 hours = \$28,614,400).

**13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in Item 12).**

**(a) The cost estimate should be split into two components: (1) a total capital and start-up cost component (annualized over its expected useful life) and (2) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities.**

**(b) If cost estimates are expected to vary widely, agencies should present ranges of cost burden and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

**(c) Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

BOEM identified three non-hour costs associated with this information collection. Those

costs are fees that BOEM charges lessees to review their planning documents, such as EPs (\$4,348 fee for 95 EPs; total \$413,060 annually), DPPs or DOCDs (\$5,017 fee for 180 DPPs and DOCDs; total \$903,060 annually), and conservation information documents (CIDs) (\$32,372 fee for 17 CIDs; total \$550,324 annually).

Also, lessees incur a non-hour cost associated with the Protected Species Observer Program. This cost totals \$1,822,080 and covers observation activities that are usually subcontracted to companies with expertise in these areas.

We estimate that the annual total non-hour cost burden is \$3,688,524.

**14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

The average Federal cost is \$70/hour. This cost is broken out in the below table using the 2023 Office of Personnel Management salary data for the REST OF THE UNITED STATES.

Position	Grade	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.6 x \$/hour)	Percent of time spent on collection	Weighted Average (\$/hour)
Clerical	GS-7/5	\$25	\$40	5%	\$2
Regulatory	GS-11/5	\$38	\$61	40%	\$24
Engineers/Geologists	GS-13/5	\$53	\$85	25%	\$21
Biologist/Physical Scientist	GS-12/5	\$45	\$72	25%	\$18
Supv. Physical Scientist/Engineer/Geologist	GS-14/5	\$63	\$101	5%	\$5
<b>Weighted Average (\$/hour)</b>					<b>\$70</b>

\* A multiplier of 1.6 (as implied by BLS news release USDL-23-0488, March 17, 2023 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

To analyze and review the information required by Subpart B and related NTLs, we estimate the Government will spend an average of approximately 1/4 hour for each hour spent by respondents for a total of 71,536 hours (286,144 divided by 4 = 71,536). Based on a cost factor of \$70 per hour, the total gross annualized cost to the Government is \$5,007,520.

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

The current OMB Control Number 1010-0151 accounts for 436,438 annual burden hours, 4,266 responses, and \$3,939,435 non-hour cost burdens. Based on several revisions, BOEM estimates the burden for the renewal will be 286,144 annual burden hours with 1,291 responses, and \$3,688,524 non-hour cost burdens.

In calculating the information collection burdens, BOEM accounted for decreases in the



number of plans submitted annually and for the changes resulting from the GOM BiOp. Per the GOM BiOp, BOEM currently requires monthly marine mammal observation and monitoring reports and a final report within 90 days of the completion of an OCS survey. Because the GOM BiOp replaced BOEM's NTL 2016-G02, which had required two reports each month, BOEM estimates an overall decrease in the burden related to these monitoring reports.

The GOM BiOp requires additional reporting if one or more individuals from a protected species are observed within an enclosed moon pool, which is an opening in the bottom of a marine platform, drill ship or vessel, through which deepwater drilling is done. The operator must report the observation within 24 hours and daily thereafter as long as any individuals from a protected species remain within the moon pool. With this new requirement, BOEM estimates a slight increase in annual reporting.

While the GOM BiOp increased certain reporting burdens for lessees and operators in the Gulf of Mexico, the overall non-hour costs are estimated to decrease due to the anticipated reduction in the number of plans submitted to BOEM.

***16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.***

We will not tabulate and publish the individual responses.

***17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.***

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

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

There are no exceptions to the certification statement.