

## SUPPORTING STATEMENT

### **Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 (40 CFR part 60, subpart OOOOa)**

#### **PART A**

##### **1.0 Identification of the Information Collection**

*(a) Title and Number of the Information Collection.*

The title of the Information Collection Request (ICR) is Standards of Performance for Crude Oil and Natural Gas Facilities for Construction, Modification, or Reconstruction Commenced After September 18, 2015 (40 CFR part 60, subpart OOOOa), U.S. Environmental Protection Agency (EPA) tracking number is 2523.04, Office of Management and Budget (OMB) Control Number 2060-0721.

*(b) Short Characterization.*

On June 3, 2016, the EPA published the final rule for NSPS for the oil and natural gas sector (“2016 NSPS OOOOa”).<sup>1</sup> The oil and natural gas sector includes operations involved in the extraction and production of oil and natural gas, as well as the processing, transmission, and distribution of natural gas. The 2016 NSPS OOOOa established standards for volatile organic compounds (VOC) and greenhouse gas (GHG) emissions from the oil and natural gas sector. This included requirements for various segments of the industry including oil and natural gas production, gas processing, and natural gas transmission and storage.

On March 28, 2017, President Donald Trump issued Executive Order 13783, entitled “Promoting Energy Independence and Economic Growth,” which directs agencies to review existing regulations that potentially burden the development of domestic energy resources, and appropriately suspend, revise, or rescind regulations that unduly burden the development of U.S. energy resources beyond what is necessary to protect the public interest or otherwise comply with the law. The EPA is finalizing amendments to 2016 NSPS OOOOa as a result of this Executive Order 13783 review (hereafter referred to as “Policy Review”). These amendments remove sources in the transmission and storage segment from the source category, rescind the NSPS (including both the volatile organic compounds (VOC) and methane requirements) applicable to

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<sup>1</sup> 81 FR 35824

those sources, and rescind the methane-specific requirements of the NSPS applicable to sources in the production and processing segments.

In addition, following promulgation of the 2016 NSPS OOOOa, the Administrator received petitions for reconsideration of several provisions of the 2016 NSPS OOOOa. The EPA granted reconsideration of the fugitive emissions requirements at well sites and compressor stations, well site pneumatic pump standards, the requirements for certification of closed vent systems, and the provisions to apply for the use of an alternative means of emission limitation. The EPA published proposed amendments to the NSPS OOOOa rule on October 15, 2018, in response to these petitions.<sup>2</sup>

In addition to the changes associated with the Policy Review, the EPA is finalizing changes and clarifications as a result of their reconsideration (hereafter referred to as “Reconsideration Amendments”). The final Reconsideration Amendments also address other issues raised, as well as revisions that provide clarity and certainty for the public and the regulated community and more broadly provides streamlining and alignment of requirements.

Therefore, this ICR reflects the EPA’s final amendments to 2016 NSPS OOOOa as a result of their Policy Review combined with the Reconsideration Amendments. The information collected will be used by the EPA and delegated state and local agencies to determine the compliance status of affected facilities subject to the rule.

The respondents are owners or operators of onshore oil and natural gas affected facilities (40 CFR 60.5365a). For the purposes of this ICR, it is assumed that oil and natural gas affected facilities located in the United States are owned and operated by the oil and natural gas industry (the “Affected Public”), and that none of the affected facilities in the United States are owned or operated by state, local, tribal or the Federal government. All affected facilities are assumed to be privately owned for-profit businesses.

The original burden estimated for the 2016 NSPS OOOOa has been updated to 689,154 hours and \$110,336,343 (\$2016) on a 3-year annual average in order to reflect a more reasonable estimate of the recordkeeping and reporting burden. The updated 2016 NSPS OOOOa baseline is discussed in section 6(f)(i) of this supporting statement. The EPA estimates an average of 519 respondents will be affected by NSPS OOOOa over the three-year period (2021-2023). The average annual burden for the recordkeeping and reporting requirements for these owners and

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<sup>2</sup> 83 FR 52056

operators is 374,988 person-hours, with an average annual cost of \$71,958,301 over the three-year period (2021-2023). The information collection activities associated with the amendments will result in an estimated average annual burden reduction of 35 percent on a cost basis compared to the updated 2016 NSPS OOOOa baseline. See section 6.f.i below for a description of the updated 2016 NSPS OOOOa burden estimate.

## **2. Need For and Use of the Collection**

### *(a) Need/Authority for the Collection.*

The EPA is charged under section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

... application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.  
Section 111(a)(1).

The Agency refers to this charge as selecting the best system of emissions reduction (BSER). Section 111 of the CAA also requires that the Administrator review and, if appropriate, revise such standards every 8 years.

In addition, section 114(a) of the CAA states that the Administrator may require any owner or operator subject to any requirement of this Act to:

- establish and maintain such records;
- make such reports;
- install, use, and maintain such monitoring equipment;
- use such audit procedures, or methods;
- sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe);
- keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical;
- submit compliance certifications in accordance with section 114(a)(3) of the CAA; and

- provide such other information as the Administrator may reasonably require.

The information collection activities being finalized under the amended NSPS OOOOa are necessary for the Administrator to confirm the compliance status of new and modified oil and natural gas affected facilities. These recordkeeping and reporting requirements are authorized by CAA section 114.

*(b) Practical Utility/Users of the Data.*

The information will be used by the delegated authority (state agency, or Regional Administrator if there is no delegated state agency) to ensure that the standards and other requirements of NSPS OOOOa are being achieved. Based on review of the recorded information at the site and the reported information, the delegated permitting authority can identify affected facilities that may not be in compliance and decide which affected facilities, records, or processes may need inspection.

**3. Nonduplication, Consultations, and Other Collection Criteria**

*(a) Nonduplication.*

The information-gathered under the amended NSPS OOOOa will replace the information gathered under the rule prior to being amended. Where it was deemed applicable, the recordkeeping and reporting requirements for the 2016 NSPS OOOOa were developed following similar reporting requirements as outlined in “Mandatory Reporting of Greenhouse Gases: Subpart W Oil and Natural Gas” in 40 CFR 98.2 and 40 CFR 98.4. By remaining consistent with subpart W, the EPA reduced the burden required to monitor and show compliance. In addition, if a State or local agency has adopted their own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards.<sup>3</sup> Therefore, no duplication exists.

*(b) Public Notice Required Prior to ICR Submission to OMB.*

The final preamble for the amendments as a result of the Policy Review and Reconsideration Amendments provided public notice of this ICR during the proposal rule phase. The EPA considered the comments received when preparing this final ICR and the preamble to the

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<sup>3</sup> For example, paragraph 60.5420a(a)(2)(ii) states that “If you are subject to state regulations that require advance notification of well completions and you have met those notification requirements, then you are considered to have met the advance notification requirements of paragraph (a)(2)(i) of this section.”

final rule provides public notice on this ICR. Specifically, comments were received indicating that the recordkeeping and reporting burden for the 2016 NSPS OOOOa was significantly underestimated. After consideration of these comments, the EPA updated the assessment of the recordkeeping and reporting burden for the 2016 NSPS OOOOa, as discussed in section 6(f)(i) of this supporting statement. The EPA also included revisions to the ICR activities that will reduce the burden associated with reporting and recordkeeping requirements on the regulated industry.

*(c) Consultations.*

In developing the final NSPS OOOOa, the EPA performed a comprehensive review of existing state rules and industry standards, consulted with individual companies and trade organizations, state agencies, and environmental groups, and consider public comments from a variety of interests. The main organizations that provided expert advice during the development of this rule include the Agency's industry experts. Stakeholder meetings and contacts are documented in the docket for the 2016 NSPS OOOOa (Docket No. EPA-HQ-OAR-2010-0505), the docket for the Reconsideration Amendments (Docket No. EPA-HQ-OAR-2017-0483), and the docket for the Policy Review (Docket No. EPA-HQ-OAR-2017-0757).

*(d) Effects of Less Frequent Collection.*

Respondents must monitor all specified criteria at each affected facility and maintain these records for 2 years, as specified under 40 CFR 60.7. The reporting frequency to the EPA has been established/amended to minimize the burden on owners and operators of affected facilities. If the information required by NSPS OOOOa were collected less frequently, the likelihood of detecting violations would be reduced.

*(e) General Guidelines.*

This collection of information is consistent with all OMB guidelines established by OMB at 5 CFR part 1320, section 1320.5.

*(f) Confidentiality.*

All information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the EPA regulations set forth in 40 CFR 2.201 et seq., Chapter 1, Part 2, Subpart B-Confidentiality of Business Information.

(g) *Sensitive Questions.*

This section is not applicable because this ICR does not involve matters of a sensitive nature.

**4. The Respondents and the Information Requested**

(a) *Respondents/NAICS Codes.*

Potential respondents under NSPS OOOOa after both the Policy Review final amendments and the final reconsideration amendments are owners or operators of new, modified or reconstructed oil and natural gas affected facilities as defined under the rule. The North American Industry Classification System (NAICS) codes for the oil and gas industry include: 211120 (Crude Petroleum Extraction); 211130 (Natural Gas Extraction); and 486210 (Pipeline Transportation of Natural Gas).

(b) Information Requested.

(i) Data Items, Including Recordkeeping Requirements

<b>Recordkeeping</b>	
For well affected facilities, record location and well identification information. Maintain completion log records for each completion operation. For wells exempt from one or more requirements, maintain records to support exemption.	60.5375a(b); 60.5410a(a); 60.5415a(a); 60.5420a(c)(1)
For well affected facilities with $\leq 300$ scf of gas per stock tank barrel of oil produced, keep records to demonstrate exemption.	60.5375a(g)(2); 60.5420a(c)(1)(vi).
For centrifugal compressor affected facilities, maintain records related to equipment, purchase, location, and control. Develop site-specific monitoring plan. Maintain compliance records for control device including continuous parameter monitoring results, visible emission observation results, inspection results, corrective actions, and maintenance. Maintain certification of closed vent system (CVS) capacity; record results of CVS and by-pass inspections, maintenance, and corrective actions. Maintain records for no detectable emissions requirement.	60.5380a(d); 60.5410a(b)(8); 60.5411a(a)(3)(i)(A); 60.5411a(d); 60.5412a(c) and (d); 60.5413a(d) and (e); 60.5415a(b); 60.5416a(a) and (b); 60.5417a(c), (e), and (f); 60.5420a(c)(2), (6)-(9), and (17).
For reciprocating compressor affected facilities, maintenance records of rod packing replacement and operating data.	60.5385a(d); 60.5410a(c)(4); 60.5415a(c); 60.5420a(c)(3)
For reciprocating compressor affected facilities that collect emissions through a CVS to a process, maintain certification of CVS capacity; record results of CVS and by-pass inspections, maintenance, and corrective actions. Maintain records for no detectable emissions requirement.	60.5385a(d); 60.5410a(c)(4); 60.5411a(a)(3)(i)(A); 60.5411a(d); 60.5416a(a) and (b)(13); 60.5420a(c)(3), (6)-(9), and (17).
For pneumatic controller affected facilities, maintain information related to equipment, purchase, and location. Requirements to tag devices. Documentation of bleed rate and justification for use of device $>6$ scfh.	60.4390a(a), (b)(2), (c)(2), (f); 60.5410a(d)(4) and (6); 60.5413a(d)(3); 60.5420a(c)(4)
For pneumatic pump affected facilities that are not controlled, maintain information related to equipment, purchase, location, and manufacturer specifications. Prepare and submit applicable certification and maintain records. Maintain information related to equipment, purchase, location, and manufacturer specifications.	60.5393a(b)(3)-(5); 60.5393a(e); 60.5410a(e)(8); 60.5420a(c)(16)
For pneumatic pump affected facilities that are controlled, maintain information related to equipment, purchase, location, manufacturer specifications, and control. Maintain certification of CVS capacity; record results of CVS and by-pass inspections, maintenance, and corrective actions.	60.5393a(c), (e); 60.5410a(e)(8); 60.5420a(c)(16); 60.5411a(c)(3)(i)(A); 60.5411a(d); 60.5416a(c); 60.5420a(c)(6)-(8), (16) and (17).
For storage vessel affected facilities, maintain compliance records for control device including visible emission observation results, inspection results, corrective actions, and maintenance. Maintain certification of CVS capacity; record results of CVS and by-pass inspections, maintenance, and corrective actions.	60.5395a(d)(3); 60.5411a(c)(3)(i)(A); 60.5411a(d); 60.5412a(c) and (d); 60.5413a(d) and (e); 60.5416a(c); 60.5417a(h)60.5420a(c)(5)-(8), (12)-(14), and (17).
For each collection of fugitive emissions components at a well site and each collection of fugitive emissions components at a compressor station, maintain records of the date of startup of production/modification, daily well site production and calculations of rolling average calculation for well sites, records of removal of major production and processing equipment at a well site, fugitive emissions monitoring plan, monitoring survey, and records of alternative fugitive emissions standards (if applicable).	60.5420a(c)(15)(i)-(vii).
For affected facilities at onshore gas processing plants, records of subject equipment, records of leak detection and repair program.	60.5400a(a), 60.482-1a(b) and (d); 60.482-7a; 60.482-10a
For sweetening unit affected facilities at onshore natural gas processing plants, records of sulfur levels, acid gas, calculations, measurements, and compliance records.	60.5407a(a); 60.5423a
<b>Notifications and Reporting</b>	
Notify the Administrator at least two days prior to a well completion operation.	60.5420a(a)(2)
Submit an annual report, per operating entity, for all wellhead, pneumatic controller, pneumatic pump, storage vessel, centrifugal and reciprocating compressor affected facilities.	60.5420a(b)
Submit an annual report for the collection of fugitive emissions components at each well site and the collection of fugitive emissions components at each compressor station.	60.5420a(b)(1); (7)
Notification of construction or reconstruction.	60.7(a)(1)
Notification of performance test.	60.8(d)
Annual reports including those of excess emissions.	60.5417a(c); 60.487a(c)(2)(i)-(vi)
Performance test results.	60.487a(e)
Semiannual report on excess emissions from and performance of continuous monitoring system, and/or summary report forms at processing plants. Annual report on excess emissions from and performance of continuous monitoring system for sweetening units.	60.5422a(b), 60.5410a(g)(3); 60.5423a(b)
Instructions for submitting reports to the EPA via CEDRI.	60.5420a(c)(11)

(ii) *Respondent Activities.*

<b>Respondent Activities</b>
Read instructions/rule.
Gather relevant information.
Perform initial performance test and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

**5. The Information Collected–Agency Activities, Collection Methodology, and Information Management**

(a) *Agency Activities.*

The federal government (EPA) activities associated with the amended NSPS OOOOa are provided in Tables 2a-2d (located at the end of this supporting statement) and are introduced in section 6(c).

(b) *Collection Methodology and Management.*

Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs of the delegated permitting authority. Information contained in the reports will be required to be submitted electronically to EPA’s Central DATA Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI). CDX enables fast, efficient and more accurate environmental data submissions from state and local governments, industry and tribes to EPA and participating program offices. EPA’s CDX is the point of entry on the Environmental Information Exchange Network (Exchange Network) for environmental data submissions to the Agency. CDX works with both EPA program offices looking for a way to better manage incoming data, and stakeholders looking for a way to reduce burden from reporting requirements. Appendix C includes the CEDRI electronic portal for submitting reports under 40 CFR part 60, subpart OOOOa. The electronic portal to submit reports online is accessed through the EPA’s CDX at <https://cdx.epa.gov>. The spreadsheet templates



created by the EPA to facilitate annual reporting for Oil and Gas Facilities under 40 CFR part 60, subpart OOOOa can be obtained at <https://www.epa.gov/electronic-reporting-air-emissions/cedri#list> as well as <https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/implementation-oil-and-natural-gas-air#report>.

(c) *Small Entity Flexibility.*

The EPA performed a screening analysis for impacts on a sample of expected affected small entities by comparing compliance costs to entity revenues during the development of the 2016 NSPS OOOOa. The impact on small entities (*i.e.*, small businesses) was taken into consideration during the development of the 2016 NSPS OOOOa and during the development of the Reconsideration Amendments. The EPA has tried to reduce the impact of this rule on small entities by specifying monitoring, recordkeeping and reporting requirements that are the minimum necessary to ensure compliance.

(d) *Collection Schedule.*

The specific frequency for each information collection activity within this request is shown in Tables 1a-1d.

## **6. Estimating the Burden and Cost of the Collection**

(a) *Estimating Respondent Burden.*

The annual burden estimates for the NSPS OOOOa are shown in Tables 1a-1d. These numbers are based on the estimated number of affected facilities that would be subject to the requirements of the NSPS from years 2021 to 2023.

(b) *Estimating Respondent Costs.*

(i) *Estimating Labor Costs.*

This ICR uses the following labor rates: \$60.56 per hour for technical labor, \$123.27 per hour for management labor, and \$40.72 for clerical labor. These rates include an increase of 110 percent to account for the benefit packages available to those employed by private industry. These rates are from the *May 2016 National Occupational Employment and Wage Estimates United States* published by the Bureau of Labor and Statistics ([https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm)). Costs have been estimated in 2016 dollars for this

ICR, which is consistent with the costs (i.e. cost of control) estimated in the supporting documents developed for the reconsideration amendments to the 2016 NSPS OOOOa.

The information collection activities for NSPS OOOOa are presented in Tables 1a-1d. Because the data are already collected by respondents as part of normal operations, no respondent costs are associated with information collection activities.

(ii) *Estimating Capital and Operations and Maintenance (O&M) Costs.*

As part of reevaluating and updating the baseline 2016 NSPS OOOOa ICR, the EPA specifically looked at the recordkeeping costs associated with the fugitive emissions requirements. Because extensive records are required for each fugitive emissions survey that is conducted it is critical that an appropriate data management system is used in order to manage the compliance data collected. Specific estimates for recordkeeping costs for the existing rule were not identified, therefore, the EPA relied on information received from commenters on the 2018 proposed reconsideration and previous information collected by the Agency for similar programs. The capital cost associated with the initial set-up of the database recordkeeping system was estimated at \$18,607 for 22 well sites or 7 gathering and boosting stations. These one-time costs were accounted for in the first-year capital costs for each new well site and gathering and boosting station. In addition to this initial set-up fee, annual licensing fees that include technical support and updates to software were incorporated into the annual recordkeeping costs. The 2020 final reconsideration TSD provides more information on how the capital and annual database recordkeeping costs were estimated.<sup>4</sup>

(c) *Estimating Agency Burden and Cost.*

Because reporting and recordkeeping requirements on the part of the respondents are required under the operating permits rules in 40 CFR part 70 or part 71 and the part 60 NSPS General Provisions, no operational costs will be incurred by the Federal Government. Publication and distribution of the information are part of the Compliance Data System, with the result that no Federal costs can be directly attributed to the ICR. Examination of records to be maintained by the respondents will occur incidentally as part of the periodic inspection of facilities that is part of EPA's overall compliance and enforcement program, and, therefore, is not attributable to the ICR.

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<sup>4</sup> See Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources. Background Technical Support Document for the Final Reconsideration of the New Source Performance Standards 40 CFR Part 60, subpart OOOOa, April 2020. (2020 Final Reconsideration TSD).

The only costs that the Federal government will incur are user costs associated with the analysis of the reported information, as presented in Tables 2a-2d.

This cost is based on the average hourly labor rate as follows:

Managerial	\$64.16 (GS-13, Step 5, \$38.92 + 60%)
Technical	\$47.62 (GS-12, Step 1, \$28.88 + 60%)
Clerical	\$25.76 (GS-6, Step 3, \$15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2016 General Schedule rates of pay, which excludes locality. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Costs have been estimated in 2016 dollars for this ICR to be consistent with other costs (*i.e.*, cost of control) estimated in the development of the 2016 NSPS OOOOa.

*(d) Estimating the Respondent Universe and Total Burden and Costs.*

It was estimated that an average of 519 respondents per year will be subject to NSPS OOOOa during the 3-year period of this ICR as shown in the following table below. This estimate encompasses the number of companies that the EPA expects will submit reports on behalf of all its well sites (note: each company is assumed to own 22 well sites). The average annual number of respondents per year is calculated using the following table.

<b>Year</b>	<b>Annual Number of Respondents</b>
1 (2021)	499
2 (2022)	522
3 (2023)	537
<b>Average</b>	<b>519</b>

For the NSPS OOOOa, the components of the total annual responses attributable to this ICR are notifications of well completions/recompletions from an estimated average of 5,178 companies over the three-year period, notification of construction, reconstruction and modification from an average of 8 companies over the three-year period, annual reports from an average of 463 companies over the three-year period, and semiannual reports from an average of 56 companies over the three-year period. (Processing facilities report semiannually, all others annually).

The average number of annual responses per year is calculated using the following table.

<b>Total Annual Responses</b>			
<b>Information Collection Activity</b>	<b>Number of Respondents<sup>a</sup></b>	<b>Number of Responses</b>	<b>Total Annual Responses</b>
Notification of well completions/recompletions	5,178 <sup>b</sup>	1	5,178
Notification of construction/ reconstruction/modification	8	1	8
Annual Compliance Reports	463	1	463
Semiannual Compliance Reports	56	2	112
		<b>Total</b>	<b>5,761</b>

<sup>a</sup>The EPA assumes each facility will make the appropriate notifications and that each respondent will submit the annual or semiannual report for all affected facilities in each year.

<sup>b</sup>Per §60.5420a(a)(2), notifications are required for each well completion/recompletion. Therefore, the estimated number of respondents is based on the estimated number of well completions/recompletions.

(e) *Bottom Line Burden Hours and Cost Tables.*

(i) *Respondent tally.* The bottom-line respondent burden hours and costs for the three years (2021-2023) covered by this ICR are presented in Table 1d (located at the end of this supporting statement). The average annual burden for the recordkeeping and reporting requirements in NSPS OOOOa for the estimated 519 respondents that are subject to the rule is 374,988 labor hours, with an annual average labor cost of \$71,958,301.

(ii) *The Agency Tally.* The average annual Federal Government cost is \$92,382 for 1,990 labor hours for NSPS OOOOa. The bottom-line Agency burden hours and costs, presented in Table 2d, are calculated from Tables 2a-2c by adding person-hours per year down each column for technical, managerial, and clerical staff, and by adding down the cost column.

(iii) *Variations in the annual bottom line.* This section does not apply since no significant variation is anticipated.

(f) *Reasons for Change in Burden.*

(i) *Updated 2016 NSPS OOOOa ICR Burden.* The original burden estimated for the 2016 NSPS OOOOa (ICR EPA tracking number 2523.03) was modified to reflect several changes that were determined to be necessary to accurately reflect the true burden of the recordkeeping and reporting burden. Comments received on 2018 NSPS OOOOa Reconsideration Proposal<sup>5</sup> indicated that the recordkeeping and reporting burden for the 2016 NSPS OOOOa was significantly underestimated. In particular, the commenters pointed to the estimated burden associated with the fugitive emissions requirements. As a result of these comments, the EPA reexamined the analysis for the 2016 NSPS OOOOa recordkeeping and reporting burden and

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<sup>5</sup> 83 FR 52056

made adjustments where warranted. The updated 2016 NSPS OOOOa baseline also reflects the use of the most current available information on the projection of affected sources. These changes resulted in an updated and more accurate assessment of the recordkeeping and reporting burden for 2016 NSPS OOOOa.

The 3-year annual average estimated for the updated 2016 NSPS OOOOa baseline is 689,154 hours and \$110,336,343 (\$2016). The annual burden estimated for the updated 2016 NSPS OOOOa baseline is shown in Appendix A.

*(ii) Final NSPS OOOOa ICR Burden*

This final NSPS OOOOa ICR burden reflects the Policy Review final amendments to remove sources in the transmission and storage segment<sup>6</sup> and the final amendments to NSPS OOOOa as a result of the EPA's reconsideration of several issues (including fugitive emissions requirements), as well as amendments to streamline the implementation of the rule.

The final NSPS OOOOa combined burden of the Policy Review and Reconsideration Amendments is 374,988 person-hours and \$71,958,301 on an annual average basis over the three-year period (2021-2023). The information collection activities associated with the final NSPS OOOOa will result in an estimated average annual burden reduction of 35 percent on a cost basis compared to the updated 2016 NSPS OOOOa burden discussed above (2016\$), or an overall reduction of 314,166 average annual labor hours and an associated decrease in average total annual respondent burden cost for reporting and recordkeeping of \$38,378,042 (\$2016) in the 3-year average.

*(g) Burden Statement*

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 65 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements;

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<sup>6</sup> For the burden associated with the removal of sources in the transmission and storage segment due to the Policy Review, see the Policy Review Supporting Statement available under Docket ID Number EPA-HQ-OAR-2017-0757.

train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To view comments received on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, the EPA has established a public docket for this ICR under Docket ID Number [EPA-HQ-OAR-2017-0483]. An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the collection of information, view public comments submitted, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are typically available for public viewing at EPA Docket Center Room 3334, EPA WJC West Building, 1301 Constitution Ave., NW, Washington, DC. EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Public Reading Room is (202) 566-1744, and the telephone number for the EPA Docket Center is (202) 566-1742.

## **PART B**

This section is not applicable because statistical methods are not used in data collection associated with the final rule.

**Policy + Technical Amendments to 2016 NSPS OOOOa**  
**Table 1a. Year 1 Respondent Burden of Reporting and Recordkeeping Requirements**  
**Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced**  
**after September 18, 2015 (40 CFR part 60, subpart OOOOa)**

Year	(A) Person-Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Person-Hours per Respondent per Year (A*B)	(D) Respondents per Year	(E) Technical Person-Hours per Year (C*D)	(F) Managerial Person-Hours per Year (0.05*E)	(G) Clerical Person-Hours per Year (0.10*E)	(H) Cost per Year
1. APPLICATIONS (Not Applicable)								
2. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS (Not Applicable)								
4. REPORT REQUIREMENTS								
A. Read Instructions								
New Affected Facilities	4	1	4	499	1,996	100	200	\$141,316
B. Required Activities								
Notification of Well Completion/Recompletion	0.25	1	0.3	10,134	2,534	127	253	\$179,370
Notification of Construction/Reconstruction/Modification	0.5	1	0.5	8	4	0	0	\$283
C. Create Information								
<i>Fugitives - Non-Low Production Well Sites</i>								
Company-Wide Monitoring Plan - 60.5397a(c)	40	1	40	380	15,200	760	1,520	\$1,076,151
Recordkeeping Database System Set-up Fee				380				\$321,480
<i>Fugitives - Gathering &amp; Boosting Compressor Stations</i>								
Company-Wide Monitoring Plan	25	1	25	30	750	38	75	\$53,100
Recordkeeping Database System Set-up Fee				30				\$558,210
D. Gather Existing Information (Included in 5C)								
E. Annual Reports								
Well Completion/Recompletion	1	1	1	10,134	10,134	507	1,013	\$717,481
Centrifugal Compressor (Wet seal) (at Production & Processing Facilities)	3	1	3	0	0	0	0	\$0
Reciprocating Compressor (at Production & Processing Facilities)	1.5	1	2	728	1,092	55	109	\$77,313
Pneumatic Controllers (at Production & Processing Facilities)	1	1	1	1,234	1,234	62	123	\$87,366
Pneumatic Pumps	2	1	2	4,641	9,282	464	928	\$657,160
Storage Vessels	2	1	2	6,372	12,744	637	1,274	\$902,268
<i>Fugitives - Well Sites</i>								
Non-Low Production	3	1	3	49,580	148,740	7,437	14,874	\$10,530,703
Low Production	1	1	1	10,566	10,566	528	1,057	\$748,066
Fugitives - Gathering & Boosting Compressor Stations	3	1	3	212	636	32	64	\$45,028
Sweetening Unit	4	1	4	7	28	1	3	\$1,982
F. Semiannual Reports								
Gas Processing Plant	24	2	48	49	2,352	118	235	\$166,520
<b>Reporting Requirement Subtotal</b>					<b>217,292</b>	<b>10,865</b>	<b>21,729</b>	<b>\$16,122,482</b>
5. RECORDKEEPING REQUIREMENTS								
A. Read Instructions (Included in 4A)								
B. Plan Activities (Included in 4B)								
C. Implement Activities								
Maintain completion log records	0.5	1	1	7,716	3,858	193	386	\$273,144
Maintain 300 GOR exemption records	1	1	1	2,418	2,418	121	242	\$171,193
Centrifugal Compressor (Wet seal) (at Production & Processing Facilities)	4	1	4	0	0	0	0	\$0
Reciprocating Compressor (Rod Packing Change) (at Production & Processing Facilities)	1	1	1	658	658	33	66	\$46,586
Reciprocating Compressor (Route to Control Device) (at Production & Processing Facilities)	2	1	2	70	140	7	14	\$9,912
Pneumatic Controllers (at Production & Processing Facilities)	4	1	4	1,234	4,936	247	494	\$349,466
Pneumatic pumps (uncontrolled)	1	1	1	1,162	1,162	58	116	\$82,269
Pneumatic pumps (controlled)	8	1	8	3,479	27,832	1,392	2,783	\$1,970,489
Storage Vessels	2	1	2	6,372	12,744	637	1,274	\$902,268
<i>Fugitives - Recordkeeping Database Maintenance/License Fee</i>								
Non-Low Production Well Sites (Semiannual Monitoring)				49,580				\$23,253,020
Gathering & Boosting Compressor Stations (Semiannual Monitoring)				1,484				\$681,156
<i>Fugitives - Additional recordkeeping/data management costs</i>								
Non-Low Production Well Sites				49,580				\$15,989,550
Low Production Well Sites	1	1	1	10,566	10,566	528	1,057	\$748,066
Gathering & Boosting Compressor Stations				1,484				\$957,180
Processing Plants	8	4	32	49	1,568	78	157	\$111,013
Sweetening Units	4	1	4	7	28	1	3	\$1,982
D. Record Data (Included in 5C)								
E. Time to Transmit or Disclose Information								
Records required by standards (Included in 4E)								
F. Train Personnel (Included in 5C)								
G. Time for Audits (Not Applicable)								
<b>Recordkeeping Requirement Subtotal</b>					<b>65,910</b>	<b>3,296</b>	<b>6,591</b>	<b>\$45,547,294</b>
<b>TOTAL REPORTING AND RECORDKEEPING LABOR AND COST</b>					<b>283,202</b>	<b>14,161</b>	<b>28,320</b>	<b>\$61,669,777</b>
						<b>325,682</b>		

**Assumptions:**

- 10,134 new wellsites in 2021 (2020 Annual Energy Outlook).
- Each company assumed to own 22 well sites.
- 250 new compressor stations per year (212 G&B (7 G&B stations per company) and 38 T&S)
- 7 new processing plants per year.
- 1 new sweetening facility per year.
- 0 new centrifugal compressors equipped with wet seals per year (2017 Compliance Reports).
- 72 reciprocating compressors in production & processing per year. (2018, GHGI, 2018 TSD and 2017 Compliance Reports). 10% route to a control device, 90% rod packing changeout.
- 1,234 new pneumatic controllers in production & processing per year (2018 GHGI).
- 663 new pneumatic pumps per year (2017 Compliance Reports). 50% are diaphragm pumps and affected facilities and 75% will be controlled (2018 TSD, page 92-93).
- 1,074 new storage vessels in 2021 (based on numbers from 2017 Compliance Reports and scaled using the number of well completions per year).

**Policy + Technical Amendments to 2016 NSPS OOOOa**  
**Table 1b. Year 2 Respondent Burden of Reporting and Recordkeeping Requirements**  
**Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced**  
**after September 18, 2015 (40 CFR part 60, subpart OOOOa)**

Year	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person-Hours per Occurrence	Number of Occurrences per Respondent per Year	Person-Hours per Respondent per Year (A*B)	Respondents per Year	Technical Person-Hours per Year (C*D)	Managerial Person-Hours per Year (0.05*E)	Clerical Person-Hours per Year (0.10*E)	Cost per Year
<b>1. APPLICATIONS (Not Applicable)</b>								
<b>2. SURVEY AND STUDIES (Not Applicable)</b>								
<b>3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS (Not Applicable)</b>								
<b>4. REPORT REQUIREMENTS</b>								
<b>A. Read Instructions</b>								
New Affected Facilities	4	1	4	522	2,088	104	209	\$147,829
<b>B. Required Activities</b>								
Notification of Well Completion/Recompletion	0.25	1	0.3	10,635	2,659	133	266	\$188,238
Notification of Construction/Reconstruction/Modification	0.5	1	0.5	8	4	0	0	\$283
<b>C. Create Information</b>								
<i>Fugitives - Non-Low Production Well Sites</i>								
Company-Wide Monitoring Plan - 60.5397a(c)	40	1	40	399	15,960	798	1,596	\$1,129,958
Recordkeeping Database System Set-up Fee				399				\$337,554
<i>Fugitives - Gathering &amp; Boosting Compressor Stations</i>								
Company-Wide Monitoring Plan	25	1	25	30	750	38	75	\$53,100
Recordkeeping Database System Set-up Fee				30				\$558,210
<b>D. Gather Existing Information (Included in 5C)</b>								
<b>E. Annual Reports</b>								
Well Completion/Recompletion	1	1	1	10,635	10,635	532	1,064	\$752,952
Centrifugal Compressor (Wet seal) (at Production & Processing Facilities)	3	1	3	0	0	0	0	\$0
Reciprocating Compressor (at Production & Processing Facilities)	1.5	1	2	832	1,248	62	125	\$88,358
Pneumatic Controllers (at Production & Processing Facilities)	1	1	1	1,234	1,234	62	123	\$87,366
Pneumatic Pumps	2	1	2	5,304	10,608	530	1,061	\$751,040
Storage Vessels	2	1	2	7,499	14,998	750	1,500	\$1,061,849
<i>Fugitives - Well Sites</i>								
Non-Low Production	3	1	3	58,347	175,041	8,752	17,504	\$12,392,798
Low Production	1	1	1	12,434	12,434	622	1,243	\$880,320
<i>Fugitives - Gathering &amp; Boosting Compressor Stations</i>								
Sweetening Unit	3	1	3	242	727	36	73	\$51,461
Sweetening Unit	4	1	4	8	32	2	3	\$2,266
<b>F. Semiannual Reports</b>								
Gas Processing Plant	24	2	48	56	2,688	134	269	\$190,309
<b>Reporting Requirement Subtotal</b>					251,106	12,555	25,111	\$18,526,061
					288,771			
<b>5. RECORDKEEPING REQUIREMENTS</b>								
<b>A. Read Instructions (Included in 4A)</b>								
<b>B. Plan Activities (Included in 4B)</b>								
<b>C. Implement Activities</b>								
Maintain completion log records	0.5	1	1	8,097	4,049	202	405	\$286,631
Maintain 300 GOR exemption records	1	1	1	2,538	2,538	127	254	\$179,689
Centrifugal Compressor (Wet seal) (at Production & Processing Facilities)	4	1	4	0	0	0	0	\$0
Reciprocating Compressor (Rod Packing Change) (at Production & Processing Facilities)	1	1	1	752	752	38	75	\$53,241
Reciprocating Compressor (Route to Control Device) (at Production & Processing Facilities)	2	1	2	80	160	8	16	\$11,328
Pneumatic Controllers (at Production & Processing Facilities)	4	1	4	1,234	4,936	247	494	\$349,466
Pneumatic pumps (uncontrolled)	1	1	1	1,328	1,328	66	133	\$94,022
Pneumatic pumps (controlled)	8	1	8	3,976	31,808	1,590	3,181	\$2,251,987
Storage Vessels	2	1	2	7,499	14,998	750	1,500	\$1,061,849
<i>Fugitives - Recordkeeping Database Maintenance/License Fee</i>								
Non-Low Production Well Sites (Semiannual Monitoring)				58,347				\$27,364,743
Gathering & Boosting Compressor Stations (Semiannual Monitoring)				1,696				\$778,464
<i>Fugitives - Additional recordkeeping/data management costs</i>								
Non-Low Production Well Sites				58,347				\$18,816,908
Low Production Well Sites	1	1	1	12,434	12,434	622	1,243	\$880,320
Gathering & Boosting Compressor Stations				1,696				\$1,093,920
Processing Plants	8	4	32	56	1,792	90	179	\$126,873
Sweetening Units	4	1	4	8	32	2	3	\$2,266
<b>D. Record Data (Included in 5C)</b>								
<b>E. Time to Transmit or Disclose Information</b>								
Records required by standards (Included in 4E)								
<b>F. Train Personnel (Included in 5C)</b>								
<b>G. Time for Audits (Not Applicable)</b>								
<b>Recordkeeping Requirement Subtotal</b>					74,827	3,741	7,483	\$53,351,706
					86,050			
<b>TOTAL REPORTING AND RECORDKEEPING LABOR AND COST</b>					325,932	16,297	32,593	\$71,877,767
					374,822			

**Assumptions:**

- 10,635 new wellsites in 2022 (2020 Annual Energy Outlook).
- Each company assumed to own 22 well sites.
- 250 new compressor stations per year (212 G&B (7 G&B stations per company) and 38 T&S)
- 7 new processing plants per year.
- 1 new sweetening facility per year.
- 0 new centrifugal compressors equipped with wet seals per year (2017 Compliance Reports).
- 72 reciprocating compressors in production & processing per year. (2018, GHGL 2018 TSD and 2017 Compliance Reports). 10% route to a control device, 90% rod packing changeout.
- 1,234 new pneumatic controllers in production & processing per year (2018 GHGL).
- 663 new pneumatic pumps per year (2017 Compliance Reports). 50% are diaphragm pumps and affected facilities and 75% will be controlled (2018 TSD, page 92-93).
- 1,127 new storage vessels in 2022 (based on numbers from 2017 Compliance Reports and scaled using the number of well completions per year).



**Policy + Technical Amendments to 2016 NSPS OOOOa**  
**Table 1c. Year 3 Respondent Burden of Reporting and Recordkeeping Requirements**  
**Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced**  
**after September 18, 2015 (40 CFR part 60, subpart OOOOa)**

Year	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person-Hours per Occurrence	Number of Occurrences per Respondent per Year	Person-Hours per Respondent per Year (A*B)	Respondents per Year	Technical Person-Hours per Year (C*D)	Managerial Person-Hours per Year (0.05*E)	Clerical Person-Hours per Year (0.10*E)	Cost per Year
<b>1. APPLICATIONS (Not Applicable)</b>								
<b>2. SURVEY AND STUDIES (Not Applicable)</b>								
<b>3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS (Not Applicable)</b>								
<b>4. REPORT REQUIREMENTS</b>								
<b>A. Read Instructions</b>								
New Affected Facilities	4	1	4	537	2,148	107	215	\$152,077
<b>B. Required Activities</b>								
Notification of Well Completion/Recompletion	0.25	1	0.3	10,964	2,741	137	274	\$194,061
Notification of Construction/Reconstruction/Modification	0.5	1	0.5	8	4	0	0	\$283
<b>C. Create Information</b>								
<i>Fugitives - Non-Low Production Well Sites</i>								
Company-Wide Monitoring Plan- 60.5397(a)(c)	40	1	40	411	16,440	822	1,644	\$1,163,942
Recordkeeping Database System Set-up Fee				411				\$347,706
<i>Fugitives - Gathering &amp; Boosting Compressor Stations</i>								
Company-Wide Monitoring Plan	25	1	25	30	750	38	75	\$53,100
Recordkeeping Database System Set-up Fee				30				\$558,210
<b>D. Gather Existing Information (Included in 5C)</b>								
<b>E. Annual Reports</b>								
Well Completion/Recompletion	1	1	1	10,964	10,964	548	1,096	\$776,245
Centrifugal Compressor (Wet seal) (at Production & Processing Facilities)	3	1	3	0	0	0	0	\$0
Reciprocating Compressor (at Production & Processing Facilities)	1.5	1	2	936	1,404	70	140	\$99,402
Pneumatic Controllers (at Production & Processing Facilities)	1	1	1	1,234	1,234	62	123	\$87,366
Pneumatic Pumps	2	1	2	5,967	11,934	597	1,193	\$844,920
Storage Vessels	2	1	2	8,661	17,322	866	1,732	\$1,226,387
<i>Fugitives - Well Sites</i>								
Non-Low Production	3	1	3	67,385	202,155	10,108	20,216	\$14,312,453
Low Production	1	1	1	14,360	14,360	718	1,436	\$1,016,679
Fugitives - Gathering & Boosting Compressor Stations	3	1	3	273	818	41	82	\$57,894
Sweetening Unit	4	1	4	9	36	2	4	\$2,549
<b>F. Semiannual Reports</b>								
Gas Processing Plant	24	2	48	63	3,024	151	302	\$214,097
<b>Reporting Requirement Subtotal</b>					285,334	14,267	28,533	\$20,955,295
						328,134		
<b>5. RECORDKEEPING REQUIREMENTS</b>								
<b>A. Read Instructions (Included in 4A)</b>								
<b>B. Plan Activities (Included in 4B)</b>								
<b>C. Implement Activities</b>								
Maintain completion log records	0.5	1	1	8,347	4,174	209	417	\$295,481
Maintain 300 GOR exemption records	1	1	1	2,616	2,616	131	262	\$185,211
Centrifugal Compressor (Wet seal) (at Production & Processing Facilities)	4	1	4	0	0	0	0	\$0
Reciprocating Compressor (Rod Packing Change) (at Production & Processing Facilities)	1	1	1	846	846	42	85	\$59,896
Reciprocating Compressor (Route to Control Device) (at Production & Processing Facilities)	2	1	2	90	180	9	18	\$12,744
Pneumatic Controllers (at Production & Processing Facilities)	4	1	4	1,234	4,936	247	494	\$349,466
Pneumatic pumps (uncontrolled)	1	1	1	1,494	1,494	75	149	\$105,774
Pneumatic pumps (controlled)	8	1	8	4,473	35,784	1,789	3,578	\$2,533,486
Storage Vessels	2	1	2	8,661	17,322	866	1,732	\$1,226,387
<i>Fugitives - Recordkeeping Database Maintenance/License Fee</i>								
Non-Low Production Well Sites (Semiannual Monitoring)				67,385				\$31,603,565
Gathering & Boosting Compressor Stations (Semiannual Monitoring)				1,908				\$875,772
<i>Fugitives - Additional recordkeeping/data management costs</i>								
Non-Low Production Well Sites				67,385				\$21,731,663
Low Production Well Sites	1	1	1	14,360	14,360	718	1,436	\$1,016,679
Gathering & Boosting Compressor Stations				1,908				\$1,230,660
Processing Plants	8	4	32	63	2,016	101	202	\$142,732
Sweetening Units	4	1	4	9	36	2	4	\$2,549
<b>D. Record Data (Included in 5C)</b>								
<b>E. Time to Transmit or Disclose Information</b>								
Records required by standards (Included in 4E)								
<b>F. Train Personnel (Included in 5C)</b>								
<b>G. Time for Audits (Not Applicable)</b>								
<b>Recordkeeping Requirement Subtotal</b>					83,764	4,188	8,376	\$61,372,065
					96,328			
<b>TOTAL REPORTING AND RECORDKEEPING LABOR AND COST</b>					369,097	18,455	36,910	\$82,327,360
						424,462		

**Assumptions:**

- 10,964 new wellsites in 2023 (2020 Annual Energy Outlook).
- Each company assumed to own 22 well sites.
- 250 new compressor stations per year (212 G&B (7 G&B stations per company) and 38 T&S)
- 7 new processing plants per year.
- 1 new sweetening facility per year.
- 0 new centrifugal compressors equipped with wet seals per year (2017 Compliance Reports).
- 72 reciprocating compressors in production & processing per year. (2018, GHGI, 2018 TSD and 2017 Compliance Reports). 10% route to a control device, 90% rod packing changeout.
- 1,234 new pneumatic controllers in production & processing per year (2018 GHGI).
- 663 new pneumatic pumps per year (2017 Compliance Reports). 50% are diaphragm pumps and affected facilities and 75% will be controlled (2018 TSD, page 92-93).
- 1,162 new storage vessels in 2023 (based on numbers from 2017 Compliance Reports and scaled using the number of well completions per year).

**Policy + Technical Amendments to 2016 NSPS OOOOa**

**Table 1d. Three-Year Average Respondent Burden of Reporting and Recordkeeping Requirements  
Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification,  
or Reconstruction Commenced after September 18, 2015 (40 CFR part 60, subpart OOOOa)**

Year	Total Respondents	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours	Labor Cost
1 (2021)	499	283,202	14,160	28,320	325,682	\$61,669,777
2 (2022)	522	325,932	16,297	32,593	374,822	\$71,877,767
3 (2023)	537	369,097	18,455	36,910	424,462	\$82,327,360
Total	1,558	978,231	48,912	97,823	1,124,965	\$215,874,903
<b>Average</b>	<b>519</b>	<b>326,077</b>	<b>16,304</b>	<b>32,608</b>	<b>374,988</b>	<b>\$71,958,301</b>

Policy + Technical Amendments to 2016 NSPS OOOOa								
Table 2a. Year 1 Annual Burden and Cost to the Federal Government								
Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015 (40 CFR part 60, subpart OOOOa)								
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
Activity	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Responses per year (a)	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost,\$ (a)
Report Review								
Notification of Construction/Reconstruction/Modification	0.5	1.0	0.5	8	4	0	0	\$214
Annual Report	3.0	1.0	3.0	450	1,350	68	135	\$72,090
Semiannual Report	3.0	2.0	6.0	49	294	15	29	\$15,700
<b>TOTAL ANNUAL BURDEN</b>					<b>1,648</b>	<b>82</b>	<b>165</b>	<b>\$88,003</b>
						<b>1,895</b>		

<sup>a</sup> The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$64.16 (GS-13, Step 5, \$40.10 x 1.6), Technical rate of \$47.62 (GS-12, Step 1, \$29.76 x 1.6), and Clerical rate of \$25.76 (GS-6, Step 3, \$16.10 x 1.6). These rates are from the Office of Personnel Management (OPM), 2016 General Schedule, which excludes locality rates of pay.

**Policy + Technical Amendments to 2016 NSPS OOOOa**  
**Table 2b. Year 2 Annual Burden and Cost to the Federal Government**  
**Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced**  
**after September 18, 2015 (40 CFR part 60, subpart OOOOa)**

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
Activity	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Responses per year (a)	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost,\$ (a)
Report Review								
Notification of Construction/Reconstruction/Modification	0.5	1.0	0.5	8	4	0	0	\$214
Annual Report	3.0	1.0	3.0	466	1,398	70	140	\$74,653
Semiannual Report	3.0	2.0	6.0	56	336	17	34	\$17,942
<b>TOTAL ANNUAL BURDEN</b>					<b>1,738</b>	<b>87</b>	<b>174</b>	<b>\$92,809</b>
						<b>1,999</b>		

<sup>a</sup>The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$64.16 (GS-13, Step 5, \$40.10 × 1.6), Technical rate of \$47.62 (GS-12, Step 1, \$29.76 × 1.6), and Clerical rate of \$25.76 (GS-6, Step 3, \$16.10 × 1.6). These rates are from the Office of Personnel Management (OPM), 2016 General Schedule, which excludes locality rates of pay.

**Policy + Technical Amendments to 2016 NSPS OOOOa**  
**Table 2c. Year 3 Annual Burden and Cost to the Federal Government**  
**Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced**  
**after September 18, 2015 (40 CFR part 60, subpart OOOOa)**

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
Activity	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Responses per year (a)	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost,\$ (a)
Report Review								
Notification of Construction/Reconstruction/Modification	0.5	1.0	0.5	8	4	0	0	\$214
Annual Report	3.0	1.0	3.0	474	1,422	71	142	\$75,935
Semiannual Report	3.0	2.0	6.0	63	378	19	38	\$20,185
<b>TOTAL ANNUAL BURDEN</b>					<b>1,804</b>	<b>90</b>	<b>180</b>	<b>\$96,334</b>
						<b>2,075</b>		

<sup>a</sup>The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$64.16 (GS-13, Step 5, \$40.10 × 1.6), Technical rate of \$47.62 (GS-12, Step 1, \$29.76 × 1.6), and Clerical rate of \$25.76 (GS-6, Step 3, \$16.10 × 1.6). These rates are from the Office of Personnel Management (OPM), 2016 General Schedule, which excludes locality rates of pay.

<b>Policy + Technical Amendments to 2016 NSPS OOOOa</b>					
<b>Table 2d. Three-Year Average Annual Burden and Cost to the Federal Government</b>					
<b>Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015 (40 CFR part 60, subpart OOOOa)</b>					
Year	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours	Labor Cost
1 (2021)	1,648	165	82	1,895	\$88,003
2 (2022)	1,738	174	87	1,999	\$92,809
3 (2023)	1,804	180	90	2,075	\$96,334
Total	5,190	519	260	5,969	\$277,146
<b>Average</b>	<b>1,730</b>	<b>173</b>	<b>87</b>	<b>1,990</b>	<b>\$92,382</b>

## **Appendix A**

### **Updated 2016 NSPS OOOOa ICR Burden**

**2016 NSPS OOOOa Updated Baseline**  
**Table 1a. Year 1 Respondent Burden of Reporting and Recordkeeping Requirements**  
**Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced**  
**after September 18, 2015 (40 CFR part 60, subpart OOOOa)**

Year	(A) Person-Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Person-Hours per Respondent per Year (A*B)	(D) Respondents per Year	(E) Technical Person-Hours per Year (C*D)	(F) Managerial Person-Hours per Year (0.05*E)	(G) Clerical Person-Hours per Year (0.10*E)	(H) Cost per Year
<b>1. APPLICATIONS (Not Applicable)</b>								
<b>2. SURVEY AND STUDIES (Not Applicable)</b>								
<b>3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS (Not Applicable)</b>								
<b>4. REPORT REQUIREMENTS</b>								
<b>A. Read Instructions</b>								
New Affected Facilities	4	1	4	537	2,148	107	215	\$152,077
<b>B. Required Activities</b>								
Notification of Well Completion/Recompletion	0.25	1	0.3	10,134	2,534	127	253	\$179,370
Notification of Construction/Reconstruction/Modification	0.5	1	0.5	8	4	0	0	\$283
<b>C. Create Information</b>								
<i>Fugitives - Well Sites</i>								
Company-Wide Monitoring Plan - 60.5397a(c)	40	1	40	461	18,440	922	1,844	\$1,305,541
Site-Specific Monitoring Plan - 60.5397a(d)	6.5	1	6.5	10,134	65,871	3,294	6,587	\$4,663,627
Recordkeeping Database System Set-up Fee				461				\$390,006
<i>Fugitives - Compressor Stations</i>								
<b>Gathering &amp; Boosting</b>								
Company-Wide Monitoring Plan	25	1	25	30	750	38	75	\$53,100
Station-Specific Monitoring Plan	6.5	1	6.5	212	1,378	69	138	\$97,562
Recordkeeping Database System Set-up Fee				30				\$558,210
<b>Transmission and Storage</b>								
Monitoring Plan	60	1	60	38	2,280	114	228	\$161,423
Recordkeeping Database System Set-up Fee				38				\$707,066
<b>D. Gather Existing Information (Included in 5C)</b>								
<b>E. Annual Reports</b>								
Well Completion/Recompletion	1	1	1	10,134	10,134	507	1,013	\$717,481
Centrifugal Compressor (Wet seal)	3	1	3	0	0	0	0	\$0
Reciprocating Compressor	1.5	1	2	1,260	1,890	95	189	\$133,811
Pneumatic Controllers	1	1	1	1,542	1,542	77	154	\$109,173
Pneumatic Pumps	2	1	2	4,641	9,282	464	928	\$657,160
Storage Vessels	2	1	2	6,372	12,744	637	1,274	\$902,268
Well Site (Fugitives)	4	1	4	60,146	240,584	12,029	24,058	\$17,033,203
Compressor Station (Fugitives)	4	1	4	478	1,912	96	191	\$135,368
Sweetening Unit	4	1	4	7	28	1	3	\$1,982
<b>F. Semiannual Reports</b>								
Gas Processing Plant	24	2	48	49	2,352	118	235	\$166,520
<b>Reporting Requirement Subtotal</b>					373,873	18,694	37,387	\$27,973,154
					429,953			
<b>5. RECORDKEEPING REQUIREMENTS</b>								
<b>A. Read Instructions (Included in 4A)</b>								
<b>B. Plan Activities (Included in 4B)</b>								
<b>C. Implement Activities</b>								
Maintain completion log records	0.5	1	1	7,716	3,858	193	386	\$273,144
Maintain 300 GOR exemption records	1	1	1	2,418	2,418	121	242	\$171,193
Centrifugal Compressor (Wet seal)	4	1	4	0	0	0	0	\$0
Reciprocating Compressor (Rod Packing Change)	1	1	1	1,134	1,134	57	113	\$80,287
Reciprocating Compressor (Route to Control Device)	2	1	2	126	252	13	25	\$17,841
Pneumatic controllers	4	1	4	1,542	6,168	308	617	\$436,691
Pneumatic pumps (uncontrolled)	1	1	1	1,162	1,162	58	116	\$82,269
Pneumatic pumps (controlled)	8	1	8	3,479	27,832	1,392	2,783	\$1,970,489
Storage Vessels	2	1	2	6,372	12,744	637	1,274	\$902,268
<i>Fugitives - Recordkeeping Database Maintenance/License Fee</i>								
Low Production Well Sites (Semiannual Monitoring)				10,566				\$4,955,454
Non-Low Production Well Sites (Semiannual Monitoring)				49,580				\$23,253,020
Compressor Stations (Quarterly Monitoring)				1,750				\$826,000
<i>Fugitives - Additional recordkeeping/data management costs</i>								
Well Sites				60,146				\$25,862,780
Compressor Stations				1,750				\$1,505,000
<i>Fugitives - Management of Change (Site Map/Observation Path)</i>								
Well Sites	1.5	1	1.5	60,146	90,219	4,511	9,022	\$6,387,451
Compressor Stations	1.5	1	1.5	1,750	2,625	131	263	\$185,848
Processing Plants	8	4	32	49	1,568	78	157	\$111,013
Sweetening Units	4	1	4	7	28	1	3	\$1,982
<b>D. Record Data (Included in 5C)</b>								
<b>E. Time to Transmit or Disclose Information</b>								
<b>Records required by standards (Included in 4E)</b>								
<b>F. Train Personnel (Included in 5C)</b>								
<b>G. Time for Audits (Not Applicable)</b>								
<b>Recordkeeping Requirement Subtotal</b>					150,008	7,500	15,001	\$67,022,730
					172,509			
<b>TOTAL REPORTING AND RECORDKEEPING LABOR AND COST</b>					523,881	26,194	52,388	\$94,995,884
					602,463			

**Assumptions:**

- 10,134 new wellsites in 2021 (2020 Annual Energy Outlook).
- Each company assumed to own 22 well sites.
- 250 new compressor stations per year (212 G&B (7 G&B stations per company) and 38 T&S)
- 7 new processing plants per year.
- 1 new sweetening facility per year.
- 0 new centrifugal compressors equipped with wet seals per year (2017 Compliance Reports).
- 180 reciprocating compressors per year. (2018 TSD and 2017 Compliance Reports). 10% are assumed to comply by routing to a control device, 90% are assumed to comply by rod packing changeout.
- 1,542 new pneumatic controllers per year (2018 GHGI).
- 663 new pneumatic pumps per year (2017 Compliance Reports). 50% are diaphragm pumps and affected facilities and 75% will be controlled (2018 TSD, page 92-93).
- 1,074 new storage vessels in 2021 (based on numbers from 2017 Compliance Reports and scaled using the number of well completions per year).

**2016 NSPS OOOOa Updated Baseline**  
**Table 1b. Year 2 Respondent Burden of Reporting and Recordkeeping Requirements**  
**Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced**  
**after September 18, 2015 (40 CFR part 60, subpart OOOOa)**

Year	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person-Hours per Occurrence	Number of Occurrences per Respondent per Year	Person-Hours per Respondent per Year (A*B)	Respondents per Year	Technical Person-Hours per Year (C*D)	Managerial Person-Hours per Year (0.05*E)	Clerical Person-Hours per Year (0.10*E)	Cost per Year
<b>1. APPLICATIONS (Not Applicable)</b>								
<b>2. SURVEY AND STUDIES (Not Applicable)</b>								
<b>3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS (Not Applicable)</b>								
<b>4. REPORT REQUIREMENTS</b>								
<b>A. Read Instructions</b>								
New Affected Facilities	4	1	4	560	2,240	112	224	\$158,591
<b>B. Required Activities</b>								
Notification of Well Completion/Recompletion	0.25	1	0.3	10,635	2,659	133	266	\$188,238
Notification of Construction/Reconstruction/Modification	0.5	1	0.5	8	4	0	0	\$283
<b>C. Create Information</b>								
<i>Fugitives - Well Sites</i>								
Company-Wide Monitoring Plan - 60.5397a(c)	40	1	40	483	19,320	966	1,932	\$1,367,844
Site-Specific Monitoring Plan - 60.5397a(d)	6.5	1	6.5	10,635	69,128	3,456	6,913	\$4,894,186
Recordkeeping Database System Set-up Fee				483				\$408,618
<i>Fugitives - Compressor Stations</i>								
<b>Gathering &amp; Boosting</b>								
Company-Wide Monitoring Plan	25	1	25	30	750	38	75	\$53,100
Station-Specific Monitoring Plan	6.5	1	6.5	212	1,378	69	138	\$97,562
Recordkeeping Database System Set-up Fee				30				\$558,210
<b>Transmission and Storage</b>								
Monitoring Plan	60	1	60	38	2,280	114	228	\$161,423
Recordkeeping Database System Set-up Fee				38				\$707,066
<b>D. Gather Existing Information (Included in 5C)</b>								
<b>E. Annual Reports</b>								
Well Completion/Recompletion	1	1	1	10,635	10,635	532	1,064	\$752,952
Centrifugal Compressor (Wet seal)	3	1	3	0	0	0	0	\$0
Reciprocating Compressor	1.5	1	2	1,440	2,160	108	216	\$152,927
Pneumatic Controllers	1	1	1	1,542	1,542	77	154	\$109,173
Pneumatic Pumps	2	1	2	5,304	10,608	530	1,061	\$751,040
Storage Vessels	2	1	2	7,499	14,998	750	1,500	\$1,061,849
Well Site (Fugitives)	4	1	4	70,781	283,124	14,156	28,312	\$20,045,009
Compressor Station (Fugitives)	4	1	4	546	2,184	109	218	\$154,626
Sweetening Unit	4	1	4	8	32	2	3	\$2,266
<b>F. Semiannual Reports</b>								
Gas Processing Plant	24	2	48	56	2,688	134	269	\$190,309
<b>Reporting Requirement Subtotal</b>					425,729	21,286	42,573	\$31,656,679
						489,589		
<b>5. RECORDKEEPING REQUIREMENTS</b>								
<b>A. Read Instructions (Included in 4A)</b>								
<b>B. Plan Activities (Included in 4B)</b>								
<b>C. Implement Activities</b>								
Maintain completion log records	0.5	1	1	8,097	4,049	202	405	\$286,631
Maintain 300 GOR exemption records	1	1	1	2,538	2,538	127	254	\$179,689
Centrifugal Compressor (Wet seal)	4	1	4	0	0	0	0	\$0
Reciprocating Compressor (Rod Packing Change)	1	1	1	1,296	1,296	65	130	\$91,756
Reciprocating Compressor (Route to Control Device)	2	1	2	144	288	14	29	\$20,390
Pneumatic controllers	4	1	4	1,542	6,168	308	617	\$436,691
Pneumatic pumps (uncontrolled)	1	1	1	1,328	1,328	66	133	\$94,022
Pneumatic pumps (controlled)	8	1	8	3,976	31,808	1,590	3,181	\$2,251,987
Storage Vessels	2	1	2	7,499	14,998	750	1,500	\$1,061,849
<i>Fugitives - Recordkeeping Database Maintenance/License Fee</i>								
Low Production Well Sites (Semiannual Monitoring)				12,434				\$5,831,546
Non-Low Production Well Sites (Semiannual Monitoring)				58,347				\$27,364,743
Compressor Stations (Quarterly Monitoring)				2,000				\$944,000
<i>Fugitives - Additional recordkeeping/data management costs</i>								
Well Sites				70,781				\$30,435,830
Compressor Stations				2,000				\$1,720,000
<i>Fugitives - Management of Change (Site Map/Observation Path)</i>								
Well Sites	1.5	1	1.5	70,781	106,172	5,309	10,617	\$7,516,878
Compressor Stations	1.5	1	1.5	2,000	3,000	150	300	\$212,398
Processing Plants	8	4	32	56	1,792	90	179	\$126,873
Sweetening Units	4	1	4	8	32	2	3	\$2,266
<b>D. Record Data (Included in 5C)</b>								
<b>E. Time to Transmit or Disclose Information</b>								
Records required by standards (Included in 4E)								
<b>F. Train Personnel (Included in 5C)</b>								
<b>G. Time for Audits (Not Applicable)</b>								
<b>Recordkeeping Requirement Subtotal</b>					173,468	8,673	17,347	\$78,577,549
						199,488		
<b>TOTAL REPORTING AND RECORDKEEPING LABOR AND COST</b>					599,197	29,960	59,920	\$110,234,228
						689,077		

**Assumptions:**

- 10,635 new wellsites in 2022 (2020 Annual Energy Outlook).
- Each company assumed to own 22 well sites.
- 250 new compressor stations per year (212 G&B (7 G&B stations per company) and 38 T&S)
- 7 new processing plants per year.
- 1 new sweetening facility per year.
- 0 new centrifugal compressors equipped with wet seals per year (2017 Compliance Reports).
- 180 reciprocating compressors per year. (2018 TSD and 2017 Compliance Reports). 10% are assumed to comply by routing to a control device, 90% are assumed to comply by rod packing changeout.
- 1,542 new pneumatic controllers per year (2018 GHGI).
- 663 new pneumatic pumps per year (2017 Compliance Reports). 50% are diaphragm pumps and affected facilities and 75% will be controlled (2018 TSD, page 92-93).
- 1,127 new storage vessels in 2022 (based on numbers from 2017 Compliance Reports and scaled using the number of well completions per year).

**2016 NSPS OOOa Updated Baseline**  
**Table 1c. Year 3 Respondent Burden of Reporting and Recordkeeping Requirements**  
**Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced**  
**after September 18, 2015 (40 CFR part 60, subpart OOOa)**

Year	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person-Hours per Occurrence	Number of Occurrences per Respondent per Year	Person-Hours per Respondent per Year (A*B)	Respondents per Year	Technical Person-Hours per Year (C*D)	Managerial Person-Hours per Year (0.05*E)	Clerical Person-Hours per Year (0.10*E)	Cost per Year
<b>1. APPLICATIONS (Not Applicable)</b>								
<b>2. SURVEY AND STUDIES (Not Applicable)</b>								
<b>3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS (Not Applicable)</b>								
<b>4. REPORT REQUIREMENTS</b>								
<b>A. Read Instructions</b>								
New Affected Facilities	4	1	4	575	2,300	115	230	\$162,839
<b>B. Required Activities</b>								
Notification of Well Completion/Recompletion	0.25	1	0.3	10,964	2,741	137	274	\$194,061
Notification of Construction/Reconstruction/Modification	0.5	1	0.5	8	4	0	0	\$283
<b>C. Create Information</b>								
<i>Fugitives - Well Sites</i>								
Company-Wide Monitoring Plan - 60.5397a(c)	40	1	40	498	19,920	996	1,992	\$1,410,324
Site-Specific Monitoring Plan - 60.5397a(d)	6.5	1	6.5	10,964	71,266	3,563	7,127	\$5,045,590
Recordkeeping Database System Set-up Fee				498				\$421,308
<i>Fugitives - Compressor Stations</i>								
<b>Gathering &amp; Boosting</b>								
Company-Wide Monitoring Plan	25	1	25	30	750	38	75	\$53,100
Station-Specific Monitoring Plan	6.5	1	6.5	212	1,378	69	138	\$97,562
Recordkeeping Database System Set-up Fee				30				\$558,210
<b>Transmission and Storage</b>								
Monitoring Plan	60	1	60	38	2,280	114	228	\$161,423
Recordkeeping Database System Set-up Fee				38				\$707,066
<b>D. Gather Existing Information (Included in 5C)</b>								
<b>E. Annual Reports</b>								
Well Completion/Recompletion	1	1	1	10,964	10,964	548	1,096	\$776,245
Centrifugal Compressor (Wet seal)	3	1	3	0	0	0	0	\$0
Reciprocating Compressor	1.5	1	2	1,620	2,430	122	243	\$172,043
Pneumatic Controllers	1	1	1	1,542	1,542	77	154	\$109,173
Pneumatic Pumps	2	1	2	5,967	11,934	597	1,193	\$844,920
Storage Vessels	2	1	2	8,661	17,322	866	1,732	\$1,226,387
Well Site (Fugitives)	4	1	4	81,745	326,980	16,349	32,698	\$23,149,988
Compressor Station (Fugitives)	4	1	4	615	2,460	123	246	\$174,167
Sweetening Unit	4	1	4	9	36	2	4	\$2,549
<b>F. Semiannual Reports</b>								
Gas Processing Plant	24	2	48	63	3,024	151	302	\$214,097
<b>Reporting Requirement Subtotal</b>					477,331	23,867	47,733	\$35,318,494
<b>5. RECORDKEEPING REQUIREMENTS</b>								
<b>A. Read Instructions (Included in 4A)</b>								
<b>B. Plan Activities (Included in 4B)</b>								
<b>C. Implement Activities</b>								
Maintain completion log records	0.5	1	1	8,347	4,174	209	417	\$295,481
Maintain 300 GOR exemption records	1	1	1	2,616	2,616	131	262	\$185,211
Centrifugal Compressor (Wet seal)	4	1	4	0	0	0	0	\$0
Reciprocating Compressor (Rod Packing Change)	1	1	1	1,458	1,458	73	146	\$103,226
Reciprocating Compressor (Route to Control Device)	2	1	2	162	324	16	32	\$22,939
Pneumatic controllers	4	1	4	1,542	6,168	308	617	\$436,691
Pneumatic pumps (uncontrolled)	1	1	1	1,494	1,494	75	149	\$105,774
Pneumatic pumps (controlled)	8	1	8	4,473	35,784	1,789	3,578	\$2,533,486
Storage Vessels	2	1	2	8,661	17,322	866	1,732	\$1,226,387
<i>Fugitives - Recordkeeping Database Maintenance/License Fee</i>								
Low Production Well Sites (Semiannual Monitoring)				14,360				\$6,734,840
Non-Low Production Well Sites (Semiannual Monitoring)				67,385				\$31,603,565
Compressor Stations (Quarterly Monitoring)				2,250				\$1,062,000
<i>Fugitives - Additional recordkeeping/data management costs</i>								
Well Sites				81,745				\$35,150,350
Compressor Stations				2,250				\$1,935,000
<i>Fugitives - Management of Change (Site Map/Observation Path)</i>								
Well Sites	1.5	1	1.5	81,745	122,618	6,131	12,262	\$8,681,245
Compressor Stations	1.5	1	1.5	2,250	3,375	169	338	\$238,948
Processing Plants	8	4	32	63	2,016	101	202	\$142,732
Sweetening Units	4	1	4	9	36	2	4	\$2,549
<b>D. Record Data (Included in 5C)</b>								
<b>E. Time to Transmit or Disclose Information</b>								
Records required by standards (Included in 4E)								
<b>F. Train Personnel (Included in 5C)</b>								
<b>G. Time for Audits (Not Applicable)</b>								
<b>Recordkeeping Requirement Subtotal</b>					197,384	9,869	19,738	\$90,460,424
					226,992			
<b>TOTAL REPORTING AND RECORDKEEPING LABOR AND COST</b>					674,715	33,736	67,472	\$125,778,918
					775,922			

**Assumptions:**

- 10,964 new wellsites in 2023 (2020 Annual Energy Outlook).
- Each company assumed to own 22 well sites.
- 250 new compressor stations per year (212 G&B (7 G&B stations per company) and 38 T&S)
- 7 new processing plants per year.
- 1 new sweetening facility per year.
- 0 new centrifugal compressors equipped with wet seals per year (2017 Compliance Reports).
- 180 reciprocating compressors per year. (2018 TSD and 2017 Compliance Reports). 10% are assumed to comply by routing to a control device, 90% are assumed to comply by rod packing changeout.
- 1,542 new pneumatic controllers per year (2018 GHGI).
- 663 new pneumatic pumps per year (2017 Compliance Reports). 50% are diaphragm pumps and affected facilities and 75% will be controlled (2018 TSD, page 92-93).
- 1,162 new storage vessels in 2023 (based on numbers from 2017 Compliance Reports and scaled using the number of well completions per year).



**2016 NSPS OOOOa Updated Baseline**

**Table 1d. Three-Year Average Respondent Burden of Reporting and Recordkeeping Requirements  
Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification,  
or Reconstruction Commenced after September 18, 2015 (40 CFR part 60, subpart OOOOa)**

<b>Year</b>	<b>Total</b>	<b>Technical Hours</b>	<b>Clerical Hours</b>	<b>Management Hours</b>	<b>Total Labor Hours</b>	<b>Labor Cost</b>
1 (2021)	537	523,881	26,194	52,388	602,463	\$94,995,884
2 (2022)	560	599,197	29,960	59,920	689,077	\$110,234,228
3 (2023)	575	674,715	33,736	67,472	775,922	\$125,778,918
Total	1,672	1,797,793	89,890	179,779	2,067,462	\$331,009,030
<b>Average</b>	<b>557</b>	<b>599,264</b>	<b>29,963</b>	<b>59,926</b>	<b>689,154</b>	<b>\$110,336,343</b>

2016 NSPS OOOOa Updated Baseline								
Table 2a. Year 1 Annual Burden and Cost to the Federal Government								
Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced								
after September 18, 2015 (40 CFR part 60, subpart OOOOa)								
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Responses per year (a)	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost,\$ (a)
Activity								
Report Review								
Notification of Construction/Reconstruction/Modification	0.5	1.0	0.5	8	4	0	0	\$214
Annual Report	4.0	1.0	4.0	488	1,952	98	195	\$104,237
Semiannual Report	4.0	2.0	8.0	49	392	20	39	\$20,933
<b>TOTAL ANNUAL BURDEN</b>					<b>2,348</b>	<b>117</b>	<b>235</b>	<b>\$125,383</b>
						<b>2,700</b>		

<sup>a</sup> The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$64.16 (GS-13, Step 5, \$40.10 × 1.6), Technical rate of \$47.62 (GS-12, Step 1, \$29.76 × 1.6), and Clerical rate of \$25.76 (GS-6, Step 3, \$16.10 × 1.6). These rates are from the Office of Personnel Management (OPM), 2016 General Schedule, which excludes locality rates of pay.

2016 NSPS OOOOa Updated Baseline								
Table 2b. Year 2 Annual Burden and Cost to the Federal Government								
Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced								
after September 18, 2015 (40 CFR part 60, subpart OOOOa)								
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Responses per year (a)	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost,\$ (a)
Activity								
Report Review								
Notification of Construction/Reconstruction/Modification	0.5	1.0	0.5	8	4	0	0	\$214
Annual Report	4.0	1.0	4.0	504	2,016	101	202	\$107,654
Semiannual Report	4.0	2.0	8.0	56	448	22	45	\$23,923
<b>TOTAL ANNUAL BURDEN</b>					<b>2,468</b>	<b>123</b>	<b>247</b>	<b>\$131,791</b>
						<b>2,838</b>		

<sup>a</sup> The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$64.16 (GS-13, Step 5, \$40.10 × 1.6), Technical rate of \$47.62 (GS-12, Step 1, \$29.76 × 1.6), and Clerical rate of \$25.76 (GS-6, Step 3, \$16.10 × 1.6). These rates are from the Office of Personnel Management (OPM), 2016 General Schedule, which excludes locality rates of pay.

2016 NSPS OOOOa Updated Baseline								
Table 2c. Year 3 Annual Burden and Cost to the Federal Government								
Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced								
after September 18, 2015 (40 CFR part 60, subpart OOOOa)								
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Responses per year (a)	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost,\$ (a)
Activity								
Report Review								
Notification of Construction/Reconstruction/Modification	0.5	1.0	0.5	8	4	0	0	\$214
Annual Report	4.0	1.0	4.0	512	2,048	102	205	\$109,363
Semiannual Report	4.0	2.0	8.0	63	504	25	50	\$26,914
<b>TOTAL ANNUAL BURDEN</b>					<b>2,556</b>	<b>128</b>	<b>256</b>	<b>\$136,490</b>
						<b>2,939</b>		

<sup>a</sup> The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$64.16 (GS-13, Step 5, \$40.10 × 1.6), Technical rate of \$47.62 (GS-12, Step 1, \$29.76 × 1.6), and Clerical rate of \$25.76 (GS-6, Step 3, \$16.10 × 1.6). These rates are from the Office of Personnel Management (OPM), 2016 General Schedule, which excludes locality rates of pay.

Table 2d. Three-Year Average Annual Burden and Cost to the Federal Government					
Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015 (40 CFR part 60, subpart OOOOa)					
Year	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours	Labor Cost
1 (2021)	2,348	235	117	2,700	\$125,383
2 (2022)	2,468	247	123	2,838	\$131,791
3 (2023)	2,556	256	128	2,939	\$136,490
Total	7,372	737	369	8,478	\$393,665
<b>Average</b>	<b>2,457</b>	<b>246</b>	<b>123</b>	<b>2,826</b>	<b>\$131,222</b>

## **Appendix B**


**Estimate of New Sources Affected for purposes of the Information Collection Request under the Final Amendments to 40 CFR Part 60, Subpart OOOOa.**

<b>Source/Facility Type</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
<b>Well Completions</b>	<b>10,791</b>	<b>5,108</b>	<b>6,579</b>	<b>8,766</b>	<b>9,084</b>	<b>9,684</b>	<b>10,134</b>	<b>10,635</b>	<b>10,964</b>
<b>Fugitives – Well Sites</b>									
<b>Non-Low Production Sites</b>	<b>8,895</b>	<b>4,211</b>	<b>5,423</b>	<b>7,226</b>	<b>7,488</b>	<b>7,983</b>	<b>8,354</b>	<b>8,767</b>	<b>9,038</b>
Gas Well Sites	1,338	633	816	1,087	1,126	1,201	1,257	1,319	1,359
Oil Well Sites (GOR > 300)	6,066	2,871	3,698	4,928	5,106	5,443	5,697	5,978	6,163
Oil Well Sites (GOR < 300)	1,492	706	909	1,212	1,255	1,339	1,401	1,470	1,515
<b>Low Production Sites</b>	<b>1,896</b>	<b>897</b>	<b>1,156</b>	<b>1,540</b>	<b>1,596</b>	<b>1,701</b>	<b>1,780</b>	<b>1,868</b>	<b>1,926</b>
Gas Well Sites	206	98	126	167	173	185	193	203	209
Oil Well Sites (GOR > 300)	606	287	370	492	510	544	569	597	616
Oil Well Sites (GOR < 300)	1,083	513	660	880	912	972	1,017	1,068	1,101
<b>GOR &lt; 300</b>	<b>2,575</b>	<b>1,219</b>	<b>1,569</b>	<b>2,092</b>	<b>2,167</b>	<b>2,311</b>	<b>2,418</b>	<b>2,538</b>	<b>2,616</b>
<b>Gas and GOR &gt; 300</b>	<b>8,216</b>	<b>3,889</b>	<b>5,010</b>	<b>6,674</b>	<b>6,915</b>	<b>7,373</b>	<b>7,716</b>	<b>8,097</b>	<b>8,347</b>
<b>Pneumatic Devices</b>	1,542	1,542	1,542	1,542	1,542	1,542	1,542	1,542	1,542
Producing & Processing	1,234	1,234	1,234	1,234	1,234	1,234	1,234	1,234	1,234
<b>Pneumatic Pumps</b>	663	663	663	663	663	663	663	663	663
Controlled	497	497	497	497	497	497	497	497	497
Not Controlled	166	166	166	166	166	166	166	166	166
<b>Reciprocating Compressors</b>	180	180	180	180	180	180	180	180	180
<i>Compressor Stations</i>	148	148	148	148	148	148	148	148	148
Production & Processing	72	72	72	72	72	72	72	72	72
<i>Rod Packing Changeout</i>	65	65	65	65	65	65	65	65	65
<i>Routed to Control</i>	7	7	7	7	7	7	7	7	7
<i>Gas Processing Plants</i>	32	32	32	32	32	32	32	32	32
<i>Rod Packing Changeout</i>	29	29	29	29	29	29	29	29	29
<i>Routed to Control</i>	3	3	3	3	3	3	3	3	3
<b>Centrifugal Compressors</b>	0	0	0	0	0	0	0	0	0
<b>Storage Vessels</b>	1,143	541	697	929	962	1,026	1,074	1,127	1,162
<b>Fugitives – Compressor Stations</b>									
Gathering and Boosting	212	212	212	212	212	212	212	212	212
<b>Natural Gas Processing Plants</b>	7	7	7	7	7	7	7	7	7
<b>Sweetening Units</b>	1	1	1	1	1	1	1	1	1




# Appendix C

## EPA's Compliance and Emissions Data Reporting (CEDRI) Interface

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- [Access CEDRI](#)
- [CEDRI Update Log \(PDF\)](#)  
(as of 08/04/2020) (17 pp, 444 KB, [About PDF](#))
- [List of Rules and Required Reports Available in CEDRI \(PDF\)](#)  
(as of 7/30/2020) (12 pp, 524 KB, [About PDF](#))


#### Related Websites


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Welcome to the Environmental Protection Agency (EPA) Central Data Exchange (CDX) - the Agency's electronic reporting site. The Central Data Exchange concept has been defined as a central point which supplements EPA reporting systems by performing new and existing functions for receiving legally acceptable data in various formats, including consolidated and integrated data.

## Appendix D

### **Instructions for submitting reports to the EPA via CEDRI per 60.5420a(c)(11):**

(11) You must submit reports to the EPA via CEDRI, except as outlined below. (CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>.) The EPA will make all the information submitted through CEDRI available to the public without further notice to you. Do not use CEDRI to submit information you claim as CBI. Anything submitted using CEDRI cannot later be claimed CBI. You must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI website (<https://www.epa.gov/electronic-reporting-air-emissions/cedri/>). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in §60.4. Once the form has been available in CEDRI for at least 90 calendar days, you must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted. Although we do not expect persons to assert a claim of CBI, if you wish to assert a CBI claim, submit a complete report generated using the appropriate form in CEDRI or an alternate electronic file consistent with the XML schema listed on the EPA's CEDRI website, including information claimed to be CBI, on a compact disc, flash drive, or other commonly used electronic storage medium to the EPA. The electronic medium shall be clearly marked as CBI and mailed to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Fuels and Incineration Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same file with the CBI omitted shall be submitted to the EPA via CEDRI. All CBI claims must be asserted at the time of submission. Furthermore, under CAA section 114(c), emissions data is not entitled to confidential treatment, and the EPA is required to make emissions data available to the public. Thus, emissions data will not be protected as CBI and will be made publicly available.