

Final NSPS OOOOb
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 December 6, 2022 (40 CFR part 60, subpart OOOOb)

| 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. Head Instructions | | | | | | | | |
| Affected Facilities | 4 | 1 | 4 | 1,228 | 4,914 | 246 | 491 | \$296,417 |
| Third Parties | 1 | 1 | 1 | 10 | 10 | 1 | 1 | \$603 |
| B. Required Activities | | | | | | | | |
| Notification of Construction/Reconstruction/Modification | 0.5 | 1 | 0.5 | 24 | 12 | 1 | 1 | \$724 |
| Notification of Well Completion/Recompletion | 0.25 | 1 | 0.3 | 17,459 | 4,365 | 218 | 436 | \$263,306 |
| Application for Certification of Third Party for Super Emitter Program | 22.00 | 1 | 22.0 | 10 | 220 | 11 | 22 | \$13,272 |
| Third Party Notification of Super Emitter Event | 6.00 | 1 | 6.0 | 0 | 0 | 0 | 0 | \$0 |
| C. State Information | | | | | | | | |
| Fugitives - Well Sites | | | | | | | | |
| Single Wellhead Only/Small Wellheads Only | | | | | | | | |
| Audible, olfactory, visual (AVO) SOP | 4 | 1 | 4 | 9,680 | 38,719 | 1,936 | 3,872 | \$2,335,761 |
| Spreadsheet to Track Inspections | 1 | 1 | 1 | 9,680 | 9,680 | 484 | 968 | \$583,940 |
| Multi Wellhead Only Well Sites (≥2 wellheads) | | | | | | | | |
| Audible, olfactory, visual (AVO) SOP | 4 | 1 | 4 | 257 | 1,028 | 51 | 103 | \$62,028 |
| OGI Monitoring Plan | 40 | 1 | 40 | 257 | 10,282 | 514 | 1,028 | \$620,276 |
| Recordkeeping Database System Set-up Fee | | | | 257 | | | | \$230,577 |
| Well sites/CPPs w/major production and processing equipment | | | | | | | | |
| Audible, olfactory, visual (AVO) SOP | 4 | 1 | 4 | 7,522 | 30,088 | 1,504 | 3,009 | \$1,815,087 |
| OGI Monitoring Plan | 40 | 1 | 40 | 7,522 | 300,881 | 15,044 | 30,088 | \$18,150,868 |
| Recordkeeping Database System Set-up Fee | | | | 7,522 | | | | \$165,799 |
| Fugitives - Compressor Stations | | | | | | | | |
| Gathering & Boosting | | | | | | | | |
| Audible, olfactory, visual (AVO) SOP | 4 | 1 | 4 | 126 | 502 | 25 | 50 | \$30,298 |
| Company-Wide Monitoring Plan | 25 | 1 | 25 | 126 | 3,139 | 157 | 314 | \$189,363 |
| Recordkeeping Database System Set-up Fee | | | | 126 | | | | \$2,477,652 |
| Transmission and Storage | | | | | | | | |
| Audible, olfactory, visual (AVO) SOP | 4 | 1 | 4 | 209 | 836 | 42 | 84 | \$50,425 |
| Monitoring Plan | 60 | 1 | 60 | 209 | 12,538 | 627 | 1,254 | \$756,376 |
| Recordkeeping Database System Set-up Fee | | | | 209 | | | | \$4,122,563 |
| D. Other Existing Information (Included in 3C) | | | | | | | | |
| E. Annual Reports | | | | | | | | |
| Well Completion/Recompletion | 1 | 1 | 1 | 17,459 | 17,459 | 873 | 1,746 | \$1,053,226 |
| Liquids Unloading (Events) | 0.25 | 1 | 0 | 8,007 | 2,002 | 100 | 200 | \$120,762 |
| Oil Wells w/Associated Gas | 1 | 1 | 1 | 10,794 | 10,794 | 540 | 1,079 | \$651,144 |
| Centrifugal Compressor | 3 | 1 | 3 | 323 | 970 | 48 | 97 | \$58,511 |
| Reciprocating Compressor | 1.5 | 1 | 2 | 2,694 | 4,040 | 202 | 404 | \$243,737 |
| Process Controllers (Sites) | 3 | 1 | 3 | 18,547 | 55,640 | 2,782 | 5,564 | \$3,256,540 |
| Storage Vessels (Sites) | 2 | 1 | 2 | 7,998 | 15,996 | 800 | 1,600 | \$964,973 |
| Fugitives - Well Sites | | | | | | | | |
| Single Wellhead Only/Small Wellheads Only | | | | | | | | |
| Audible, olfactory, visual (AVO) SOP | 1 | 1 | 1 | 9,680 | 9,680 | 484 | 968 | \$583,940 |
| Multi Wellhead Only Well Sites (≥2 wellheads) | 3 | 1 | 3 | 257 | 771 | 39 | 77 | \$46,521 |
| Well sites/CPPs w/major production and processing equipment | | | | | | | | |
| Audible, olfactory, visual (AVO) SOP | 3 | 1 | 3 | 7,522 | 22,566 | 1,128 | 2,257 | \$1,361,315 |
| Fugitives - Compressor Stations | 3 | 1 | 3 | 335 | 1,004 | 50 | 100 | \$60,542 |
| Pumps (Sites) | 2 | 1 | 2 | 3,896 | 7,793 | 390 | 779 | \$470,108 |
| Sweetening Unit | 4 | 1 | 4 | 1 | 4 | 0 | 0 | \$241 |
| F. Semiannual Reports | | | | | | | | |
| Gas Processing Plant | 24 | 2 | 48 | 23 | 1,104 | 55 | 110 | \$66,600 |
| G. Super Emitter Reports | | | | | | | | |
| Super Emitter Reports | 13 | 1 | 13 | 0 | 0 | 0 | 0 | \$0 |
| Reporting Requirement Subtotal | | | | | 567,037 | 28,352 | 56,704 | \$41,202,895 |
| | | | | | | | | \$38,382,724 |
| 5. RECORDKEEPING REQUIREMENTS | | | | | | | | |
| A. Head Instructions (Included in 4A) | | | | | | | | |
| B. Plan Activities (Included in 4B) | | | | | | | | |
| C. Implement Activities | | | | | | | | |
| Maintain completion log records | 0.5 | 1 | 1 | 13,292 | 6,646 | 332 | 665 | \$400,936 |
| Maintain 300 GOR exemption records | 1 | 1 | 1 | 4,166 | 4,166 | 208 | 417 | \$251,346 |
| Liquids Unloading (Events) | 0.10 | 1 | 0 | 8,007 | 801 | 40 | 80 | \$48,305 |
| Oil Wells w/Associated Gas | 2.0 | 1 | 2 | 14,960 | 29,921 | 1,496 | 2,992 | \$1,804,981 |
| Centrifugal Compressor | 4 | 1 | 4 | 323 | 1,293 | 65 | 129 | \$78,014 |
| Reciprocating Compressor | 1 | 1 | 1 | 2,694 | 2,694 | 135 | 269 | \$162,491 |
| Process Controllers (Sites) | 4 | 1 | 4 | 18,547 | 74,187 | 3,709 | 7,419 | \$4,475,387 |
| Storage Vessels (Sites) | 2 | 1 | 2 | 7,998 | 15,996 | 800 | 1,600 | \$964,973 |
| Fugitives - Recordkeeping Database Maintenance/License Fee | | | | | | | | |
| Multi Wellhead Only Well Sites (≥2 wellheads) | | | | 257 | | | | \$223,122 |
| Well sites/CPPs w/major production and processing equipment | | | | 7,522 | | | | \$6,529,127 |
| Compressor Stations | | | | 335 | | | | \$290,372 |
| Fugitives - Additional recordkeeping/data management costs | | | | | | | | |
| Multi Wellhead Only Well Sites (≥2 wellheads) | | | | 257 | | | | \$83,028 |
| Well sites/CPPs w/major production and processing equipment | | | | 7,522 | | | | \$2,429,618 |
| Compressor Stations | | | | 335 | | | | \$213,772 |
| Pumps (Sites) | 2 | 1 | 2 | 3,896 | 7,793 | 390 | 779 | \$470,108 |
| Processing Plants | 8 | 4 | 32 | 23 | 736 | 37 | 74 | \$44,400 |
| Sweetening Units | 4 | 1 | 4 | 1 | 4 | 0 | 0 | \$241 |
| Liquids Unloading | 2 | 1 | 2 | 8,007 | 16,015 | 801 | 1,601 | \$966,097 |
| D. Record Data (Included in 3C) | | | | | | | | |
| E. Time to Transmit or Disclose Information | | | | | | | | |
| F. Train Personnel (Included in 3C) | | | | | | | | |
| G. Time for Audits (Not Applicable) | | | | | | | | |
| H. Super Emitter Events | | | | | | | | |
| Super Emitter Events | 21 | 1 | 21 | 0 | 0 | 0 | 0 | \$0 |
| Recordkeeping Requirement Subtotal | | | | | 160,252 | 8,013 | 16,025 | \$19,438,320 |
| | | | | | | | | \$184,289 |
| TOTAL REPORTING AND RECORDKEEPING LABOR AND COST | | | | | 727,289 | 36,364 | 72,729 | \$60,641,215 |
| | | | | | | | | \$36,382 |

Labor Rates May-21
 Technical 49.56 Plant and System Operators 51-8000 (\$23.60 + 110%)
 Managerial 120.52 General and Operations Managers 11-1021 (\$57.39 + 110%)
 Clerical 47.40 Secretaries and Administrative Assistants 43-6010 (\$22.57 + 110%)

Subpart OOOOb
 Proposed
 Requirement

\$60.5420b(1)
 \$60.5420b(2)
 \$60.5371b(a)
 \$60.5371b(b)

\$60.5397b(c)

\$60.5397b(c)

\$60.5420b(1) (b)(2), (b)(11)
 \$60.5420b(1) (b)(3)
 \$60.5420b(1) (b)(4)
 \$60.5420b(1) (b)(5), (b)(11)
 \$60.5420b(1) (b)(6), (b)(11)
 \$60.5420b(1) (b)(7), (b)(11)
 \$60.5420b(1) (b)(8), (b)(11)
 \$60.5420b(1) (b)(9)

\$60.5420b(1) (b)(9)
 \$60.5420b(1) (b)(10), (b)(11)

\$60.5403b(c), \$60.5423b(b)

\$60.5400b(1), \$60.5420b(1), (b)(11), \$60.5422b

\$60.5371b(e)

\$60.5375b(d); 60.5410b(a); 60.5413b(a); 60.5420b(1)
 \$60.5375b(g)(1); 60.5420b(1)(v)
 \$60.5375b; 60.5420b(c)(2)
 \$60.5377b; 60.5420b(c)(3)
 \$60.5380b(d); 60.5420b(c)(4), (b)(13)
 \$60.5380b(d); 60.5420b(c)(5), (b), (10), (12)
 \$60.5390b(e); 60.5420b(c)(6), (c)(8), (c)(10)-(13)
 \$60.5395b(d)(3); 60.5420b(c)(7), (b)-(13)

\$60.5383b(i); 60.5420b(1)(b)(10)-(13), (15)
 \$60.5400b(1), \$60.5421b
 \$60.5403b(c), \$60.5423b(a)
 \$60.5420b(c)(2)

\$60.5371b(c), (d), (e)

Assumptions:
 Fugitives with OGI requirements: \$897
 Recordkeeping Database system set-up fee per well site \$19,728
 Recordkeeping Database Maintenance/License Fee \$868
 Additional recordkeeping/data management costs per well site \$323
 Additional recordkeeping/data management costs per compressor station \$645

Final NSPS OOOOb
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 December 6, 2022 (40 CFR part 60, subpart OOOOb)

Labor Rates May-21
 Technical 49.56 Plant and System Operators 51-8000 (\$23.60 + 110%)
 Managerial 120.52 General and Operations Managers 11-1021 (\$57.39 + 110%)
 Clerical 47.40 Secretaries and Administrative Assistants 43-6010 (\$22.57 + 110%)

Subpart OOOOb
 Proposed
 Requirement

| 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. Head Instructions | | | | | | | | |
| Affected Facilities | 4 | 1 | 4 | 1,856 | 7,425 | 371 | 742 | \$447,891 |
| Third Parties | 1 | 1 | 1 | 2 | 2 | 0 | 0 | \$121 |
| B. Required Activities | | | | | | | | |
| Notification of Construction/Reconstruction/Modification | 0.5 | 1 | 0.5 | 12 | 6 | 0 | 1 | \$362 |
| Notification of Well Completion/Recompletion | 0.25 | 1 | 0.3 | 9,866 | 2,467 | 123 | 247 | \$148,793 |
| Application for Certification of Third Party for Super Emitter Program | 22.00 | 1 | 22.0 | 2 | 44 | 2 | 4 | \$2,654 |
| Third Party Notification of Super Emitter Event | 6.00 | 1 | 6.0 | 500 | 3,000 | 150 | 300 | \$189,977 |
| C. State Information | | | | | | | | |
| Fugitives - Well Sites | | | | | | | | |
| Single Wellhead Only/Small Well Sites Only | | | | | | | | |
| Audible, olfactory, visual (AVO) SOP | 4 | 1 | 4 | 5,470 | 21,881 | 1,094 | 2,188 | \$1,319,981 |
| Spreadsheet to Track Inspections | 1 | 1 | 1 | 5,470 | 5,470 | 274 | 547 | \$329,995 |
| Multi Wellhead Only Well Sites (≥2 wellheads) | | | | | | | | |
| Audible, olfactory, visual (AVO) SOP | 4 | 1 | 4 | 145 | 591 | 29 | 58 | \$35,053 |
| OGI Monitoring Plan | 40 | 1 | 40 | 145 | 5,811 | 291 | 581 | \$350,529 |
| Recordkeeping Database System Set-up Fee | | | | 145 | | | | \$130,303 |
| Well sites/CPFs w/major production and processing equipment | | | | | | | | |
| Audible, olfactory, visual (AVO) SOP | 4 | 1 | 4 | 4,251 | 17,003 | 850 | 1,700 | \$1,025,738 |
| OGI Monitoring Plan | 40 | 1 | 40 | 4,251 | 170,034 | 8,502 | 17,003 | \$10,257,384 |
| Recordkeeping Database System Set-up Fee | | | | 4,251 | | | | \$93,696 |
| Fugitives - Compressor Stations | | | | | | | | |
| Gathering & Boosting | | | | | | | | |
| Audible, olfactory, visual (AVO) SOP | 4 | 1 | 4 | 63 | 251 | 13 | 25 | \$15,149 |
| Company-Wide Monitoring Plan | 25 | 1 | 25 | 63 | 1,570 | 78 | 157 | \$94,681 |
| Recordkeeping Database System Set-up Fee | | | | 63 | | | | \$1,238,526 |
| Transmission and Storage | | | | | | | | |
| Audible, olfactory, visual (AVO) SOP | 4 | 1 | 4 | 104 | 418 | 21 | 42 | \$25,213 |
| Monitoring Plan | 60 | 1 | 60 | 104 | 6,269 | 313 | 627 | \$378,188 |
| Recordkeeping Database System Set-up Fee | | | | 104 | | | | \$2,061,282 |
| D. Gather Existing Information (Included in 5C) | | | | | | | | |
| E. Annual Reports | | | | | | | | |
| Well Completion/Recompletion | 1 | 1 | 1 | 9,866 | 9,866 | 493 | 987 | \$595,173 |
| Liquids Unloading (Events) | 0.25 | 1 | 0 | 12,532 | 3,133 | 157 | 313 | \$189,007 |
| Oil Wells w/Associated Gas | 1 | 1 | 1 | 16,894 | 16,894 | 845 | 1,689 | \$1,019,117 |
| Centrifugal Compressor | 3 | 1 | 3 | 485 | 1,455 | 73 | 145 | \$87,766 |
| Reciprocating Compressor | 1.5 | 1 | 2 | 4,040 | 6,061 | 303 | 606 | \$365,606 |
| Process Controllers (Sites) | 3 | 1 | 3 | 28,957 | 86,871 | 4,344 | 8,687 | \$5,240,561 |
| Storage Vessels (Sites) | 2 | 1 | 2 | 11,993 | 23,986 | 1,199 | 2,399 | \$1,446,954 |
| Fugitives - Well Sites | | | | | | | | |
| Single Wellhead Only/Small Well Sites Only | | | | | | | | |
| Audible, olfactory, visual (AVO) SOP | 1 | 1 | 1 | 15,150 | 15,150 | 758 | 1,515 | \$913,936 |
| Multi Wellhead Only Well Sites (≥2 wellheads) | 3 | 1 | 3 | 402 | 1,207 | 60 | 121 | \$72,810 |
| Well sites/CPFs w/major production and processing equipment | 3 | 1 | 3 | 11,773 | 35,319 | 1,766 | 3,532 | \$2,130,619 |
| Fugitives - Compressor Stations | 3 | 1 | 3 | 502 | 1,505 | 75 | 151 | \$90,813 |
| Pumps (Sites) | 2 | 1 | 2 | 6,041 | 12,082 | 604 | 1,208 | \$728,870 |
| Sweetening Unit | 4 | 1 | 4 | 2 | 8 | 0 | 1 | \$483 |
| F. Semiannual Reports | | | | | | | | |
| Gas Processing Plant | 24 | 2 | 48 | 34 | 1,632 | 82 | 163 | \$98,451 |
| G. Super Emitter Reports | | | | | | | | |
| Super Emitter Reports | 13 | 1 | 13 | 500 | 6,500 | 325 | 650 | \$392,117 |
| Reporting Requirement Subtotal | | | | | 457,399 | 22,870 | 45,740 | \$31,116,683 |
| 5. RECORDKEEPING REQUIREMENTS | | | | | | | | |
| A. Head Instructions (Included in 4A) | | | | | | | | |
| B. Plan Activities (Included in 4B) | | | | | | | | |
| C. Implement Activities | | | | | | | | |
| Maintain completion log records | 0.5 | 1 | 1 | 20,894 | 10,402 | 520 | 1,040 | \$627,513 |
| Maintain 300 GOR exemption records | 1 | 1 | 1 | 6,521 | 6,521 | 326 | 652 | \$393,387 |
| Liquids Unloading (Events) | 0.10 | 1 | 0 | 12,532 | 1,253 | 63 | 125 | \$75,693 |
| Oil Wells w/Associated Gas | 2.0 | 1 | 2 | 16,894 | 33,787 | 1,689 | 3,379 | \$2,038,234 |
| Centrifugal Compressor | 4 | 1 | 4 | 485 | 1,940 | 97 | 194 | \$117,021 |
| Reciprocating Compressor | 1 | 1 | 1 | 4,040 | 4,040 | 202 | 404 | \$243,737 |
| Process Controllers (Sites) | 4 | 1 | 4 | 28,957 | 115,828 | 5,791 | 11,583 | \$6,987,415 |
| Storage Vessels (Sites) | 2 | 1 | 2 | 11,993 | 23,986 | 1,199 | 2,399 | \$1,446,954 |
| Fugitives - Recordkeeping Database Maintenance/License Fee | | | | | | | | |
| Multi Wellhead Only Well Sites (≥2 wellheads) | | | | 145 | | | | \$136,090 |
| Well sites/CPFs w/major production and processing equipment | | | | 4,251 | | | | \$3,689,728 |
| Compressor Stations | | | | 502 | | | | \$435,559 |
| Fugitives - Additional recordkeeping/data management costs | | | | | | | | |
| Multi Wellhead Only Well Sites (≥2 wellheads) | | | | 145 | | | | \$46,921 |
| Well sites/CPFs w/major production and processing equipment | | | | 4,251 | | | | \$1,373,021 |
| Compressor Stations | | | | 502 | | | | \$323,658 |
| Pumps (Sites) | 2 | 1 | 2 | 6,041 | 12,082 | 604 | 1,208 | \$728,870 |
| Processing Plants | 8 | 4 | 32 | 34 | 1,088 | 54 | 109 | \$65,634 |
| Sweetening Units | 4 | 1 | 4 | 2 | 8 | 0 | 1 | \$483 |
| Liquids Unloading | 2 | 1 | 2 | 12,532 | 25,065 | 1,253 | 2,506 | \$1,512,055 |
| D. Record Data (Included in 5C) | | | | | | | | |
| E. Time to Transmit or Disclose Information | | | | | | | | |
| F. Time Required by Standards (Included in 4E) | | | | | | | | |
| F. Time Permitted (Included in 5C) | | | | | | | | |
| G. Time for Audits (Not Applicable) | | | | | | | | |
| H. Super Emitter Events | | | | | | | | |
| Super Emitter Events | 21 | 1 | 21 | 500 | 10,500 | 525 | 1,050 | \$633,419 |
| Recordkeeping Requirement Subtotal | | | | | 236,001 | 11,800 | 23,600 | \$20,231,882 |
| TOTAL REPORTING AND RECORDKEEPING LABOR AND COST | | | | | 693,400 | 34,670 | 69,340 | \$51,348,565 |

\$60.5420b(1)

\$60.5420b(2)

\$60.5371b(a)

\$60.5371b(b)

\$60.5397b(c)

\$60.5397b(c)

\$60.5420b(1), (b)(2), (b)(11)

\$60.5420b(1), (b)(3)

\$60.5420b(1), (b)(4)

\$60.5420b(1), (b)(5), (b)(11)

\$60.5420b(1), (b)(6), (b)(11)

\$60.5420b(1), (b)(7), (b)(11)

\$60.5420b(1), (b)(8), (b)(11)

\$60.5420b(1), (b)(9)

\$60.5420b(1), (b)(9)

\$60.5420b(1), (b)(9)

\$60.5420b(1), (b)(10), (b)(11)

\$60.5400b(e), \$60.5420b(b)

\$60.5400b(e), \$60.5420b(b)

\$60.5400b(e), \$60.5420b(1), (b)(11), \$60.5420b

\$60.5371b(e)

\$26,731,261

\$60.5375b(b); 60.5410b(e); 60.5415b(a); 60.5420b(c)(1)

\$60.5375b(b)(1); 60.5420b(c)(1)(v)

\$60.5375b, \$60.5420b(c)(2)

\$60.5375b, \$60.5420b(c)(3)

\$60.5380b(a); 60.5420b(c)(4), (b)(13)

\$60.5380b(a); 60.5420b(c)(5), (b)(10), (12)

\$60.5380b(a); 60.5420b(c)(6), (c)(8), (c)(10)-(13)

\$60.5380b(a)(3); 60.5420b(c)(7), (b)(13)

\$60.5390b(c); 60.5420b(c)(8), (10)-(13), (15)

\$60.5400b(1), \$60.5421b

\$60.5400b(e), \$60.5423b(a)

\$60.5420b(c)(2)

\$60.5371b(c), (d), (e)

Assumptions:
 Fugitives with OGI requirements: \$897
 Recordkeeping Database system set-up fee per well site: \$19,728
 Recordkeeping Database system set-up fee per compressor station: \$868
 Recordkeeping Database Maintenance/License Fee: \$323
 Additional recordkeeping/data management costs per well site: \$645
 Additional recordkeeping/data management costs per compressor station: \$645

Final NSPS OOOOb
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 December 6, 2022 (40 CFR part 60, subpart OOOOb)

| 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. Head Instructions | | | | | | | | |
| Affected Facilities | 4 | 1 | 4 | 2,448 | 9,792 | 490 | 979 | \$590,686 |
| Third Parties | 1 | 1 | 1 | 2 | 2 | 0 | 0 | \$121 |
| B. Required Activities | | | | | | | | |
| Notification of Construction/Reconstruction/Modification | 0.5 | 1 | 0.5 | 12 | 6 | 0 | 1 | \$362 |
| Notification of Well Completion/Recompletion | 0.25 | 1 | 0.3 | 10,753 | 2,688 | 134 | 269 | \$162,170 |
| Application for Certification of Third Party for Super Emitter Program | 22.00 | 1 | 22.0 | 2 | 44 | 2 | 4 | \$2,654 |
| Third Party Notification of Super Emitter Event | 6.00 | 1 | 6.0 | 250 | 1,500 | 75 | 150 | \$90,488 |
| C. State Information | | | | | | | | |
| Fugitives - Well Sites | | | | | | | | |
| Single Wellhead Only/Small Well Sites Only | | | | | | | | |
| Audible, olfactory, visual (AVO) SOP | 4 | 1 | 4 | 5,962 | 23,848 | 1,192 | 2,385 | \$1,438,656 |
| Spreadsheet to Track Inspections | 1 | 1 | 1 | 5,962 | 5,962 | 298 | 596 | \$359,664 |
| Multi Wellhead Only Well Sites (≥2 wellheads) | | | | | | | | |
| Audible, olfactory, visual (AVO) SOP | 4 | 1 | 4 | 158 | 633 | 32 | 63 | \$38,204 |
| OGI Monitoring Plan | 40 | 1 | 40 | 158 | 6,333 | 317 | 633 | \$382,044 |
| Recordkeeping Database System Set-up Fee | | | | 158 | | | | \$142,018 |
| Well sites/CPFs w/major production and processing equipment | | | | | | | | |
| Audible, olfactory, visual (AVO) SOP | 4 | 1 | 4 | 4,633 | 18,532 | 927 | 1,853 | \$1,117,959 |
| OGI Monitoring Plan | 40 | 1 | 40 | 4,633 | 185,321 | 9,266 | 18,532 | \$11,179,588 |
| Recordkeeping Database System Set-up Fee | | | | 4,633 | | | | \$102,120 |
| Fugitives - Compressor Stations | | | | | | | | |
| Gathering & Boosting | | | | | | | | |
| Audible, olfactory, visual (AVO) SOP | 4 | 1 | 4 | 63 | 251 | 13 | 25 | \$15,149 |
| Company-Wide Monitoring Plan | 25 | 1 | 25 | 63 | 1,570 | 78 | 157 | \$94,681 |
| Recordkeeping Database System Set-up Fee | | | | 63 | | | | \$1,236,526 |
| Transmission and Storage | | | | | | | | |
| Audible, olfactory, visual (AVO) SOP | 4 | 1 | 4 | 104 | 418 | 21 | 42 | \$25,213 |
| Monitoring Plan | 60 | 1 | 60 | 104 | 6,269 | 313 | 627 | \$378,188 |
| Recordkeeping Database System Set-up Fee | | | | 104 | | | | \$2,061,282 |
| D. Gather Existing Information (Included in 5C) | | | | | | | | |
| E. Annual Reports | | | | | | | | |
| Well Completion/Recompletion | 1 | 1 | 1 | 10,753 | 10,753 | 538 | 1,075 | \$648,682 |
| Liquids Unloading (Events) | 0.25 | 1 | 0 | 17,464 | 4,366 | 218 | 437 | \$263,387 |
| Oil Wells w/Associated Gas | 1 | 1 | 1 | 23,542 | 23,542 | 1,177 | 2,354 | \$1,420,173 |
| Centrifugal Compressor | 3 | 1 | 3 | 647 | 1,940 | 97 | 194 | \$117,021 |
| Reciprocating Compressor | 1.5 | 1 | 2 | 5,307 | 8,081 | 404 | 808 | \$487,474 |
| Process Controllers (Sites) | 3 | 1 | 3 | 40,254 | 120,763 | 6,038 | 12,076 | \$7,285,117 |
| Storage Vessels (Sites) | 2 | 1 | 2 | 16,119 | 32,238 | 1,612 | 3,224 | \$1,944,764 |
| Fugitives - Well Sites | | | | | | | | |
| Single Wellhead Only/Small Well Sites Only | | | | | | | | |
| Audible, olfactory, visual (AVO) SOP | 1 | 1 | 1 | 21,112 | 21,112 | 1,056 | 2,111 | \$1,273,600 |
| Multi Wellhead Only Well Sites (≥2 wellheads) | 3 | 1 | 3 | 561 | 1,682 | 84 | 168 | \$101,464 |
| Well sites/CPFs w/major production and processing equipment | 3 | 1 | 3 | 16,406 | 49,218 | 2,461 | 4,922 | \$2,969,088 |
| Fugitives - Compressor Stations | 3 | 1 | 3 | 669 | 2,007 | 100 | 201 | \$121,085 |
| Pumps (Sites) | 2 | 1 | 2 | 8,339 | 16,678 | 834 | 1,668 | \$1,006,128 |
| Sweetening Unit | 4 | 1 | 4 | 3 | 12 | 1 | 1 | \$724 |
| F. Semiannual Reports | | | | | | | | |
| Gas Processing Plant | 24 | 2 | 48 | 45 | 2,160 | 108 | 216 | \$130,303 |
| G. Super Emitter Reports | | | | | | | | |
| Super Emitter Reports | 13 | 1 | 13 | 250 | 3,250 | 163 | 325 | \$196,058 |
| Reporting Requirement Subtotal | | | | | 557,720 | 27,886 | 55,772 | \$37,188,785 |
| | | | | | 641,378 | | | \$31,126,252 |
| 5. RECORDKEEPING REQUIREMENTS | | | | | | | | |
| A. Head Instructions (Included in 4A) | | | | | | | | |
| B. Plan Activities (Included in 4B) | | | | | | | | |
| C. Implement Activities | | | | | | | | |
| Maintain completion log records | 0.5 | 1 | 1 | 28,991 | 14,496 | 725 | 1,450 | \$874,460 |
| Maintain 300 GOR exemption records | 1 | 1 | 1 | 9,087 | 9,087 | 454 | 909 | \$548,198 |
| Liquids Unloading (Events) | 0.10 | 1 | 0 | 17,464 | 1,746 | 87 | 175 | \$105,355 |
| Oil Wells w/Associated Gas | 2.0 | 1 | 2 | 23,542 | 47,084 | 2,354 | 4,708 | \$2,840,347 |
| Centrifugal Compressor | 4 | 1 | 4 | 647 | 2,586 | 129 | 259 | \$156,029 |
| Reciprocating Compressor | 1 | 1 | 1 | 5,307 | 5,307 | 269 | 539 | \$324,983 |
| Process Controllers (Sites) | 4 | 1 | 4 | 40,254 | 161,018 | 8,051 | 16,102 | \$9,713,489 |
| Storage Vessels (Sites) | 2 | 1 | 2 | 16,119 | 32,238 | 1,612 | 3,224 | \$1,944,764 |
| Fugitives - Recordkeeping Database Maintenance/License Fee | | | | | | | | |
| Multi Wellhead Only Well Sites (≥2 wellheads) | | | | 158 | | | | \$137,427 |
| Well sites/CPFs w/major production and processing equipment | | | | 4,633 | | | | \$4,021,458 |
| Compressor Stations | | | | 669 | | | | \$580,745 |
| Fugitives - Additional recordkeeping/data management costs | | | | | | | | |
| Multi Wellhead Only Well Sites (≥2 wellheads) | | | | 158 | | | | \$51,139 |
| Well sites/CPFs w/major production and processing equipment | | | | 4,633 | | | | \$1,496,464 |
| Compressor Stations | | | | 669 | | | | \$411,544 |
| Pumps (Sites) | 2 | 1 | 2 | 8,339 | 16,678 | 834 | 1,668 | \$1,006,128 |
| Processing Plants | 8 | 4 | 32 | 45 | 1,440 | 72 | 144 | \$86,869 |
| Sweetening Units | 4 | 1 | 4 | 3 | 12 | 1 | 1 | \$724 |
| Liquids Unloading | 2 | 1 | 2 | 17,464 | 34,929 | 1,746 | 3,493 | \$2,107,099 |
| D. Record Data (Included in 5C) | | | | | | | | |
| E. Time to Transmit or Disclose Information | | | | | | | | |
| F. Tests Performed (Included in 5C) | | | | | | | | |
| G. Time for Audits (Not Applicable) | | | | | | | | |
| H. Super Emitter Events | | | | | | | | |
| Super Emitter Events | 21 | 1 | 21 | 250 | 5,250 | 263 | 525 | \$316,710 |
| Recordkeeping Requirement Subtotal | | | | | 326,701 | 16,335 | 32,670 | \$26,427,221 |
| | | | | | 884,421 | 44,221 | 88,442 | \$63,616,006 |
| TOTAL REPORTING AND RECORDKEEPING LABOR AND COST | | | | | 1,017,084 | | | |

Labor Rates May-21
 Technical 49.56
 Managerial 120.52
 Clerical 47.40
 Plant and System Operators 51-8000 (\$23.60 + 110%)
 General and Operations Managers 11-1021 (\$57.39 + 110%)
 Secretaries and Administrative Assistants 43-6010 (\$22.57 + 110%)

Subpart OOOOb
 Proposed
 Requirement

§60.5420b(a)(1)

§60.5420b(a)(2)

§60.5371b(a)

§60.5371b(b)

§60.5397b(c)

§60.5397b(c)

§60.5420b(1)(i), (b)(11)

§60.5420b(1)(ii), (b)(11)

§60.5420b(1)(iii), (b)(11)

§60.5420b(1)(iv), (b)(11)

§60.5420b(1)(v), (b)(11)

§60.5420b(1)(vi), (b)(11)

§60.5420b(1)(vii), (b)(11)

§60.5420b(1)(viii), (b)(11)

§60.5420b(1)(i), (b)(9)

§60.5420b(1)(ii), (b)(10), (b)(11)

§60.5409b(e), §60.5420b(b)

§60.5409b(e), §60.5420b(b)(1), (b)(11), §60.5422b

§60.5371b(e)

§60.5375b(b); 60.5410b(a); 60.5415b(a); 60.5420b(c)(1)

§60.5375b(b)(1); 60.5420b(c)(1)(v)

§60.5375b, §60.5420b(c)(2)

§60.5375b, §60.5420b(c)(3)

§60.5380b(a); 60.5420b(c)(4), (b)(13)

§60.5380b(a); 60.5420b(c)(5), (b)(10), (12)

§60.5380b(a); 60.5420b(c)(6), (c)(8), (c)(10)-(13)

§60.5380b(a)(3); 60.5420b(c)(7), (b)(13)

§60.5397b(c); 60.5420b(c)(8), (10)-(13), (15)

§60.5409b(i), §60.5421b

§60.5409b(e), §60.5423b(a)

§60.5420b(c)(2)

§60.5371b(c), (d), (e)

Assumptions:
 Fugitives with OGI requirements: \$897
 Recordkeeping Database system set-up fee per well site: \$19,728
 Recordkeeping Database system set-up fee per compressor station: \$868
 Recordkeeping Database Maintenance/License Fee: \$323
 Additional recordkeeping/data management costs per well site: \$645
 Additional recordkeeping/data management costs per compressor station: \$645

Final NSPS OOOOb

**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 December 6, 2022
(40 CFR part 60, subpart OOOOb)**

| Year | Total Respondents | Technical Hours | Clerical Hours | Management Hours | Total Labor Hours | Labor Cost |
|----------------|-------------------|-----------------|----------------|------------------|-------------------|---------------------|
| 1 (2023) | 1,238 | 727,289 | 36,364 | 72,729 | 836,382 | \$60,641,215 |
| 2 (2024) | 1,858 | 693,400 | 34,670 | 69,340 | 797,410 | \$51,348,565 |
| 3 (2025) | 2,450 | 884,421 | 44,221 | 88,442 | 1,017,084 | \$63,616,006 |
| Total | 5,546 | 2,305,110 | 115,255 | 230,511 | 2,650,876 | 175,605,786 |
| Average | 1,849 | 768,370 | 38,418 | 76,837 | 883,625 | \$58,535,262 |

| |
|---------------------|
| Capital Cost |
| \$16,767,031 |
| \$9,518,784 |
| \$10,262,723 |
| \$36,548,537 |
| \$12,182,846 |

| Total Annual Responses | | |
|--|-----------------------|---------------------|
| Information Collection Activity | Number of Respondents | Number of Responses |
| Notification of well completions/recompletions | 12,693 | 1 |
| Notification of construction/reconstruction/modification | 16 | 1 |
| Annual Compliance Reports | 1,810 | 1 |
| Semiannual Compliance Reports | 34 | 2 |
| Application for Certification of Third Party for Super Emitter Program | 5 | 1 |
| Third Party Notification of Super Emitter Event | 250 | 1 |
| | | Total |

| |
|----------------------|
| |
| Total Annual Reports |
| 12,693 |
| 16 |
| 1,810 |
| 68 |
| 5 |
| 250 |
| 14,841 |

hours/response

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Table 2a. Year 1 Annual Burden and Cost to the Federal Government for Construction Activities for Crude Oil and Natural Gas Facilities for which Construction Starts after December 6, 2022 (40 CFR part 60, subpart C)

| Activity | (A) EPA person-hours per occurrence | (B) No. of occurrences per plant per year | (C) EPA person-hours per plant per year (C=AxB) | (D) Responses per year (a) |
|--|--|--|---|-------------------------------|
| Certification | | | | |
| Develop Guidance for Third Party Application | 320.0 | 1.0 | 320.0 | 1 |
| Review Application for Third Party Certification as Notifier | 80.0 | 1.0 | 80.0 | 10 |
| Provide Assistance for Third Party Certification Questions | 8.0 | 1.0 | 8.0 | 20 |
| Report Review | | | | |
| Notification of Construction/Reconstruction/Modification | 0.5 | 1.0 | 0.5 | 24 |
| Notification of Well Completion/Recompletion | 0.5 | 1.0 | 0.5 | 17,459 |
| Notification of Super Emitter Event | 0.5 | 1.0 | 0.5 | 0 |
| Super Emitter Program Report | 1.5 | 1.0 | 1.5 | 0 |
| Annual Report | 3.0 | 1.0 | 3.0 | 1,205 |
| Semiannual Report | 3.0 | 2.0 | 6.0 | 23 |
| TOTAL ANNUAL BURDEN | | | | |

^a The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government × 1.6), Technical rate of \$52.37 (GS-12, Step 1, \$32.73 × 1.6), and Clerical rate of \$28.34 (GS-6, Step 3, \$17.71 × 1.6). These rates are from the General Schedule, which excludes locality rates of pay.

| Labor category -- Agency | \$/hr | Description from Reference 1. |
|--------------------------|---------|-------------------------------|
| Technical | \$52.37 | GS-12, Step 1, \$32.73 + 60% |
| Management | \$70.56 | GS-13, Step 5, \$44.10 + 60% |
| Clerical | \$28.34 | GS-6, Step 3, \$17.71 + 60% |

^a Unloaded labor rates from U.S. Office of Personnel Management
<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/GS_h.pdf>

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| (E) Technical person-hours per year (E=CxD) | (F) Management person-hours per year (Ex0.05) | (G) Clerical person- hours per year (Ex0.1) | (H) Cost,\$ (a) |
|---|---|--|--------------------|
| | | | |
| 320 | 16 | 32 | \$18,793 |
| 800 | 40 | 80 | \$46,984 |
| 160 | 8 | 16 | \$9,397 |
| | | | |
| 12 | 1 | 1 | \$705 |
| 8,730 | 436 | 873 | \$512,680 |
| 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | \$0 |
| 3,616 | 181 | 362 | \$212,378 |
| 138 | 7 | 14 | \$8,105 |
| 12,496 | 625 | 1,250 | \$733,868 |
| 14,370 | | | |

t overhead expenses. Managerial rates of \$70.56 (GS-13, Step 5, \$44.10 rates are from the Office of Personnel Management (OPM), 2022

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Table 2b. Year 2 Annual Burden and Cost to the Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction started after December 6, 2022 (40 CFR part 60, subpart GGGG)

| Activity | (A) EPA person-hours per occurrence | (B) No. of occurrences per plant per year | (C) EPA person-hours per plant per year (C=AxB) |
|--|--|--|---|
| Certification | | | |
| Develop Guidance for Third Party Application | 320.0 | 1.0 | 320.0 |
| Review Application for Third Party Certification as Notifier | 80.0 | 1.0 | 80.0 |
| Provide Assistance for Third Party Certification Questions | 20.0 | 1.0 | 20.0 |
| Report Review | | | |
| Notification of Construction/Reconstruction/Modification | 0.5 | 1.0 | 0.5 |
| Notification of Well Completion/Recompletion | 0.5 | 1.0 | 0.5 |
| Notification of Super Emitter Event | 0.5 | 1.0 | 0.5 |
| Super Emitter Program Report | 1.5 | 1.0 | 1.5 |
| Annual Report | 3.0 | 1.0 | 3.0 |
| Semiannual Report | 3.0 | 2.0 | 6.0 |
| TOTAL ANNUAL BURDEN | | | |

^a The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for the cost of benefits: Technical rate of \$44.10 × 1.6, Technical rate of \$52.37 (GS-12, Step 1, \$32.73 × 1.6), and Clerical rate of \$28.34 (GS-6, Step 3, \$17.46 × 1.6), 2022 General Schedule, which excludes locality rates of pay.

| Labor category -- Agency | \$/hr | Description from |
|--------------------------|---------|------------------|
| Technical | \$52.37 | GS-12, Step 1 |
| Management | \$70.56 | GS-13, Step 5 |
| Clerical | \$28.34 | GS-6, Step 3, |

^a Unloaded labor rates from U.S. Office of Personnel Management
https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/GS_h.pdf

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Construction, Modification, or Reconstruction Commenced
Department 0000b)**

| (D) Responses per year (a) | (E) Technical person-hours per year (E=CxD) | (F) Management person-hours per year (Ex0.05) | (G) Clerical person- hours per year (Ex0.1) | (H) Cost,\$ (b) |
|-------------------------------------|---|---|--|--------------------|
| 0 | 0 | 0 | 0 | \$0 |
| 2 | 160 | 8 | 16 | \$9,397 |
| 6 | 120 | 6 | 12 | \$7,048 |
| 12 | 6 | 0 | 1 | \$352 |
| 9,866 | 4,933 | 247 | 493 | \$289,713 |
| 500 | 250 | 13 | 25 | \$14,682 |
| 500 | 750 | 38 | 75 | \$44,047 |
| 1,822 | 5,466 | 273 | 547 | \$321,040 |
| 34 | 204 | 10 | 20 | \$11,981 |
| | 11,609 | 580 | 1,161 | \$681,816 |
| | 13,351 | | | |

or government overhead expenses. Managerial rates of \$70.56 (GS-13, Step 5, \$17.71 × 1.6). These rates are from the Office of Personnel Management

n Reference 1.
, \$32.73 + 60%
, \$44.10 + 60%
\$17.71 + 60%

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Table 2c. Year 3 Annual Burden and Cost to the Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction Starts after December 6, 2022 (40 CFR part 60, subpart S)

| Activity | (A) EPA person-hours per occurrence | (B) No. of occurrences per plant per year | (C) EPA person-hours per plant per year (C=AxB) |
|--|--|--|---|
| Certification | | | |
| Develop Guidance for Third Party Application | 320.0 | 1.0 | 320.0 |
| Review Application for Third Party Certification as Notifier | 80.0 | 1.0 | 80.0 |
| Provide Assistance for Third Party Certification Questions | 20.0 | 1.0 | 20.0 |
| Report Review | | | |
| Notification of Construction/Reconstruction/Modification | 0.5 | 1.0 | 0.5 |
| Notification of Well Completion/Recompletion | 0.5 | 1.0 | 0.5 |
| Notification of Super Emitter Event | 0.5 | 1.0 | 0.5 |
| Super Emitter Program Report | 1.5 | 1.0 | 1.5 |
| Annual Report | 3.0 | 1.0 | 3.0 |
| Semiannual Report | 3.0 | 2.0 | 6.0 |
| TOTAL ANNUAL BURDEN | | | |

^a The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for: Management rate of \$44.10 × 1.6), Technical rate of \$52.37 (GS-12, Step 1, \$32.73 × 1.6), and Clerical rate of \$28.34 (GS-6, Step 3, (OPM), 2022 General Schedule, which excludes locality rates of pay.

| Labor category -- Agency | \$/hr | Description from |
|--------------------------|---------|------------------|
| Technical | \$52.37 | GS-12, Step 1 |
| Management | \$70.56 | GS-13, Step 5 |
| Clerical | \$28.34 | GS-6, Step 3, |

^a Unloaded labor rates from U.S. Office of Personnel Management
https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/GS_h.p

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Subpart OOOOb)**

| (D) Responses per year (a) | (E) Technical person-hours per year (E=CxD) | (F) Management person-hours per year (Ex0.05) | (G) Clerical person- hours per year (Ex0.1) | (H) Cost,\$ (b) |
|-------------------------------------|---|---|--|--------------------|
| 0 | 0 | 0 | 0 | \$0 |
| 2 | 160 | 8 | 16 | \$9,397 |
| 6 | 120 | 6 | 12 | \$7,048 |
| 12 | 6 | 0 | 1 | \$352 |
| 10,753 | 5,377 | 269 | 538 | \$315,760 |
| 250 | 125 | 6 | 13 | \$7,341 |
| 250 | 375 | 19 | 38 | \$22,024 |
| 2,403 | 7,209 | 360 | 721 | \$423,365 |
| 45 | 270 | 14 | 27 | \$15,857 |
| | 13,361 | 668 | 1,336 | \$784,699 |
| | 15,365 | | | |

for government overhead expenses. Managerial rates of \$70.56 (GS-13, Step 5, \$17.71 × 1.6). These rates are from the Office of Personnel Management

n Reference 1.
, \$32.73 + 60%
, \$44.10 + 60%
\$17.71 + 60%

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Final NSPS OOOOb

**Table 2d. Three-Year Average Annual Burden and Cost to the Industry for Compliance with the
Standards of Performance for Crude Oil and Natural Gas Facilities for New Construction
or Reconstruction Commenced after December 18, 2002
(40 CFR part 60, subpart OOOOb)**

| Year | Technical Hours | Clerical Hours | Management Hours |
|----------------|-----------------|----------------|------------------|
| 1 (2023) | 12,496 | 1,250 | 625 |
| 2 (2024) | 11,609 | 1,161 | 580 |
| 3 (2025) | 13,361 | 1,336 | 668 |
| Total | 37,466 | 3,747 | 1,873 |
| Average | 12,489 | 1,249 | 624 |

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which Construction, Modification,
r 6, 2022**

| Total Labor Hours | Labor Cost |
|-------------------|------------------|
| 14,370 | \$733,868 |
| 13,351 | \$681,816 |
| 15,365 | \$784,699 |
| 43,086 | \$2,200,383 |
| 14,362 | \$733,461 |

Number of New Sources Each Year (not cumulative)

| Source | 2023 | 2024 | 2025 |
|---|---------------|--------------|---------------|
| Well Sites | 17,459 | 9,866 | 10,753 |
| Single Wellhead Only/Small Wellsites Only | 9,680 | 5,470 | 5,962 |
| Multi Wellhead Only Well Sites (≥2 wellheads) | 257 | 145 | 158 |
| Well sites/CPFs w/major production and processing equipment | 7,522 | 4,251 | 4,633 |
| Non-Low Production Sites | 14,392 | 8,133 | 8,865 |
| Gas Well Sites | 2,165 | 1,224 | 1,334 |
| Oil Well Sites (GOR > 300) | 9,814 | 5,546 | 6,045 |
| Oil Well Sites (GOR < 300) | 2,413 | 1,364 | 1,486 |
| Low Production Sites | 3,067 | 1,733 | 1,889 |
| Gas Well Sites | 333 | 188 | 205 |
| Oil Well Sites (GOR > 300) | 980 | 554 | 604 |
| Oil Well Sites (GOR < 300) | 1,753 | 991 | 1,080 |
| GOR < 300 | 4,166 | 2,355 | 2,566 |
| Gas and GOR > 300 | 13,292 | 7,512 | 8,187 |
| Liquid Unloadings (Events) | 8,007 | 4,525 | 4,932 |
| Process Controllers (Sites) | 18,547 | 10,410 | 11,297 |
| Pumps (Sites) | 3,896 | 2,145 | 2,298 |
| Reciprocating Compressors | 2,694 | 1,347 | 1,347 |
| Centrifugal Compressors | 323 | 162 | 162 |
| Storage Vessels (Sites) | 7,998 | 3,995 | 4,126 |
| Gathering and Boosting Compressor Stations | 879 | 439 | 439 |
| Transmission Compressor Stations | 204 | 102 | 102 |
| Storage Compressor Stations | 5 | 2 | 2 |
| Natural Gas Processing Plants | 23 | 11 | 11 |
| Sweetening Units | 1 | 1 | 1 |

NOTE: Sources in this table represent new sources becoming subject to the rule each year and are not cumulative amounts.

*New sources in 2023 include 2021 and 2022 sources assumed to be affected after December 2022.

**Estimates for natural gas processing plants obtained from Table 2-5 of Draft 2022 RIA, received from David Bielen 7-28-2022.

***Estimates for sweetening units obtained from November 2021 RIA.

RESPONDENTS

| 2023 | 2024 | 2025 |
|------|-------|-------|
| 794 | 1,242 | 1,731 |

This represents the number of companies, assuming 22 well sites per company.

| | | |
|-----|-----|-----|
| 156 | 219 | 251 |
| 240 | 342 | 408 |
| 7 | 9 | 10 |
| 30 | 41 | 45 |
| 2 | 3 | 3 |

This represents the number of companies, assuming 7 gathering and boosting stations per company.

| | | |
|-------|-------|-------|
| 1,228 | 1,856 | 2,448 |
|-------|-------|-------|

This represents the total number of respondents.

| Emis.Source | Segment | Well.Site. | Well.Site.Equip.Bin | Year |
|----------------------------------|---------|------------|----------------------------|------|
| Dry Seal Centrifugal Compressors | G&B | | | 2023 |
| Dry Seal Centrifugal Compressors | G&B | | | 2024 |
| Dry Seal Centrifugal Compressors | G&B | | | 2025 |
| Dry Seal Centrifugal Compressors | PROC | | | 2023 |
| Dry Seal Centrifugal Compressors | PROC | | | 2024 |
| Dry Seal Centrifugal Compressors | PROC | | | 2025 |
| Dry Seal Centrifugal Compressors | TRANS | | | 2023 |
| Dry Seal Centrifugal Compressors | TRANS | | | 2024 |
| Dry Seal Centrifugal Compressors | TRANS | | | 2025 |
| Fugitives | PROD | Single | 1: No equipment, no tanks | 2023 |
| Fugitives | PROD | Single | 2: Tanks, no equipment | 2023 |
| Fugitives | PROD | Single | 3: Equipment = 1, no tanks | 2023 |
| Fugitives | PROD | Single | 4: Equipment > 1, no tanks | 2023 |
| Fugitives | PROD | Single | 5: Equipment = 1 and tanks | 2023 |
| Fugitives | PROD | Single | 6: Equipment > 1 and tanks | 2023 |
| Fugitives | PROD | Multi | 1: No equipment, no tanks | 2023 |
| Fugitives | PROD | Multi | 2: Tanks, no equipment | 2023 |
| Fugitives | PROD | Multi | 3: Equipment = 1, no tanks | 2023 |
| Fugitives | PROD | Multi | 4: Equipment > 1, no tanks | 2023 |
| Fugitives | PROD | Multi | 5: Equipment = 1 and tanks | 2023 |
| Fugitives | PROD | Multi | 6: Equipment > 1 and tanks | 2023 |
| Fugitives | PROD | Single | 1: No equipment, no tanks | 2024 |
| Fugitives | PROD | Single | 2: Tanks, no equipment | 2024 |
| Fugitives | PROD | Single | 3: Equipment = 1, no tanks | 2024 |
| Fugitives | PROD | Single | 4: Equipment > 1, no tanks | 2024 |
| Fugitives | PROD | Single | 5: Equipment = 1 and tanks | 2024 |
| Fugitives | PROD | Single | 6: Equipment > 1 and tanks | 2024 |
| Fugitives | PROD | Multi | 1: No equipment, no tanks | 2024 |
| Fugitives | PROD | Multi | 2: Tanks, no equipment | 2024 |
| Fugitives | PROD | Multi | 3: Equipment = 1, no tanks | 2024 |
| Fugitives | PROD | Multi | 4: Equipment > 1, no tanks | 2024 |
| Fugitives | PROD | Multi | 5: Equipment = 1 and tanks | 2024 |
| Fugitives | PROD | Multi | 6: Equipment > 1 and tanks | 2024 |
| Fugitives | PROD | Single | 1: No equipment, no tanks | 2025 |
| Fugitives | PROD | Single | 2: Tanks, no equipment | 2025 |
| Fugitives | PROD | Single | 3: Equipment = 1, no tanks | 2025 |
| Fugitives | PROD | Single | 4: Equipment > 1, no tanks | 2025 |
| Fugitives | PROD | Single | 5: Equipment = 1 and tanks | 2025 |
| Fugitives | PROD | Single | 6: Equipment > 1 and tanks | 2025 |
| Fugitives | PROD | Multi | 1: No equipment, no tanks | 2025 |
| Fugitives | PROD | Multi | 2: Tanks, no equipment | 2025 |
| Fugitives | PROD | Multi | 3: Equipment = 1, no tanks | 2025 |
| Fugitives | PROD | Multi | 4: Equipment > 1, no tanks | 2025 |
| Fugitives | PROD | Multi | 5: Equipment = 1 and tanks | 2025 |
| Fugitives | PROD | Multi | 6: Equipment > 1 and tanks | 2025 |
| Fugitives | G&B | | | 2023 |
| Fugitives | G&B | | | 2024 |
| Fugitives | G&B | | | 2025 |
| Fugitives | PROC | | | 2023 |
| Fugitives | PROC | | | 2024 |
| Fugitives | PROC | | | 2025 |
| Fugitives | TRANS | | | 2023 |

| | | |
|----------------------------------|-------|------|
| Fugitives | TRANS | 2024 |
| Fugitives | TRANS | 2025 |
| Fugitives | STOR | 2023 |
| Fugitives | STOR | 2024 |
| Fugitives | STOR | 2025 |
| Liquids Unloading | PROD | 2023 |
| Liquids Unloading | PROD | 2024 |
| Liquids Unloading | PROD | 2025 |
| PnC | PROD | 2023 |
| PnC | PROD | 2024 |
| PnC | PROD | 2025 |
| PnC | G&B | 2023 |
| PnC | G&B | 2024 |
| PnC | G&B | 2025 |
| PnC | TRANS | 2023 |
| PnC | TRANS | 2024 |
| PnC | TRANS | 2025 |
| PnC | STOR | 2023 |
| PnC | STOR | 2024 |
| PnC | STOR | 2025 |
| Pumps | PROD | 2023 |
| Pumps | PROD | 2024 |
| Pumps | PROD | 2025 |
| Pumps | G&B | 2023 |
| Pumps | G&B | 2024 |
| Pumps | G&B | 2025 |
| Pumps | TRANS | 2023 |
| Pumps | TRANS | 2024 |
| Pumps | TRANS | 2025 |
| Pumps | STOR | 2023 |
| Pumps | STOR | 2024 |
| Pumps | STOR | 2025 |
| Reciprocating Compressors | G&B | 2023 |
| Reciprocating Compressors | G&B | 2024 |
| Reciprocating Compressors | G&B | 2025 |
| Reciprocating Compressors | PROC | 2023 |
| Reciprocating Compressors | PROC | 2024 |
| Reciprocating Compressors | PROC | 2025 |
| Reciprocating Compressors | TRANS | 2023 |
| Reciprocating Compressors | TRANS | 2024 |
| Reciprocating Compressors | TRANS | 2025 |
| Reciprocating Compressors | STOR | 2023 |
| Reciprocating Compressors | STOR | 2024 |
| Reciprocating Compressors | STOR | 2025 |
| Tanks | PROD | 2023 |
| Tanks | PROD | 2024 |
| Tanks | PROD | 2025 |
| Wet Seal Centrifugal Compressors | G&B | 2023 |
| Wet Seal Centrifugal Compressors | G&B | 2024 |
| Wet Seal Centrifugal Compressors | G&B | 2025 |
| Wet Seal Centrifugal Compressors | PROC | 2023 |
| Wet Seal Centrifugal Compressors | PROC | 2024 |
| Wet Seal Centrifugal Compressors | PROC | 2025 |

| | | |
|----------------------------------|-------|------|
| Wet Seal Centrifugal Compressors | TRANS | 2023 |
| Wet Seal Centrifugal Compressors | TRANS | 2024 |
| Wet Seal Centrifugal Compressors | TRANS | 2025 |

Source: icr_facility_counts_summary.xlsx received from David Bielen, EPA on 7-27-2022.

Fac.Count.Fac.Count.Fac.Count.Fac.Count.2

| | |
|---------|----------|
| Devices | 40.87738 |
| Devices | 61.31607 |
| Devices | 81.75476 |
| Devices | 14.03606 |
| Devices | 21.05408 |
| Devices | 28.07211 |
| Devices | 241.7184 |
| Devices | 362.5776 |
| Devices | 483.4368 |
| Sites | 4599.912 |
| Sites | 483.6475 |
| Sites | 282.4781 |
| Sites | 452.9228 |
| Sites | 929.7449 |
| Sites | 2931.096 |
| Sites | 257.0533 |
| Sites | 462.4932 |
| Sites | 47.6429 |
| Sites | 1149.061 |
| Sites | 245.5029 |
| Sites | 5617.335 |
| Sites | 7199.406 |
| Sites | 756.9655 |
| Sites | 442.1116 |
| Sites | 708.8777 |
| Sites | 1455.161 |
| Sites | 4587.512 |
| Sites | 402.3188 |
| Sites | 723.8565 |
| Sites | 74.56677 |
| Sites | 1798.417 |
| Sites | 384.241 |
| Sites | 8791.793 |
| Sites | 10032.61 |
| Sites | 1054.856 |
| Sites | 616.0972 |
| Sites | 987.8445 |
| Sites | 2027.815 |
| Sites | 6392.849 |
| Sites | 560.6446 |
| Sites | 1008.718 |
| Sites | 103.9113 |
| Sites | 2506.153 |
| Sites | 535.4526 |
| Sites | 12251.66 |
| Sites | 878.9214 |
| Sites | 1318.382 |
| Sites | 1757.843 |
| Sites | 13.01189 |
| Sites | 19.51784 |
| Sites | 26.02378 |
| Sites | 204.0463 |

| | | |
|---------------|----------|------------------|
| Sites | 306.0695 | |
| Sites | 408.0926 | |
| Sites | 4.923847 | |
| Sites | 7.38577 | |
| Sites | 9.847693 | |
| Events | 8007.346 | |
| Events | 12532.44 | |
| Events | 17464.37 | |
| Sites | 17458.89 | Devices 76056.75 |
| Sites | 27325.23 | Devices 118805 |
| Sites | 38078.61 | Devices 165293.4 |
| Sites | 878.9214 | Devices 17009.6 |
| Sites | 1318.382 | Devices 25514.4 |
| Sites | 1757.843 | Devices 34019.2 |
| Sites | 204.0463 | Devices 6806.776 |
| Sites | 306.0695 | Devices 10210.16 |
| Sites | 408.0926 | Devices 13613.55 |
| Sites | 4.923847 | Devices 359.7423 |
| Sites | 7.38577 | Devices 539.6134 |
| Sites | 9.847693 | Devices 719.4845 |
| Sites | 3017.5 | Devices 3762.18 |
| Sites | 4722.743 | Devices 5885.953 |
| Sites | 6581.299 | Devices 8199.653 |
| Sites | 878.9214 | Devices 1822.016 |
| Sites | 1318.382 | Devices 2733.024 |
| Sites | 1757.843 | Devices 3644.032 |
| Sites | 0 | Devices 0 |
| Devices | 2003.991 | |
| Devices | 3005.986 | |
| Devices | 4007.981 | |
| Devices | 87.66829 | |
| Devices | 131.5024 | |
| Devices | 175.3366 | |
| Devices | 580.8955 | |
| Devices | 871.3433 | |
| Devices | 1161.791 | |
| Devices | 21.0176 | |
| Devices | 31.52641 | |
| Devices | 42.03521 | |
| Tank Batterie | 7998.035 | Tanks 49254.22 |
| Tank Batterie | 11992.86 | Tanks 74998.32 |
| Tank Batterie | 16118.88 | Tanks 101999.1 |
| Devices | 26.67286 | |
| Devices | 40.0093 | |
| Devices | 53.34573 | |
| Devices | 0 | |
| Devices | 0 | |
| Devices | 0 | |

| | |
|---------|---|
| Devices | 0 |
| Devices | 0 |
| Devices | 0 |