

Exhibit 1a. Lower Bound Respondent Burden and Cost of Reporting and Recordkeeping Requirements for States, Emissions Guidelines for Greenhouse Gas Emissions from Existing Crude Oil and Natural Gas Facilities (40 CFR Part 60, Subpart OOOOc)

Burden Item	(A) Hours/ Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent/Year (A x B)	(D) Respondents/ Year	(E) Total Hours/Year (C x D)	(F) Technical Hours/Year (E x 0.79)	(G) Managerial Hours/Year (E x 0.09)	(H) Clerical Hours/Year (E x 0.12)	(I) Cost/Year
1. REPORTING REQUIREMENTS									
A. Read and Understand Rule Requirements	Incl. in 1B								
B. Required Activities									
Develop state plan									
States w/compressor stations only ^{a,b}	1,040	1	1,040	7	6,933	5,477	624	832	\$878,523
Other States w/existing requirements ^{c,d}	2,080	1	2,080	3	6,933	5,477	624	832	\$878,523
Other States w/o existing requirements ^{e,f}	6,240	1	6,240	7	41,600	32,864	3,744	4,992	\$5,271,136
C. Create Information	Incl. in 1B								
D. Gather Information	Incl. in 1B								
E. Report Preparation									
Develop final plan	Incl. in 1B								
Negative declaration ^g		1	1	0.3	0	0	0	0	\$42
AVERAGE ANNUAL LABOR BURDEN AND COST					55,467	43,819	4,992	6,656	\$7,028,224
AVERAGE ANNUALIZED COSTS (O&M) (Reporting/recordkeeping supplies)									\$36,750

^aBurden based on 0.5 FTEs per state to develop, submit and implement state plans.

^bRespondents include 20 states expected to develop, submit, and implement a state plan for compressor stations only, averaged over the 3-year ICR period (20/3=7).

^cBurden based on 1 FTE per state to develop, submit, and implement state plans.

^dRespondents include 10 states expected to have existing requirements in place similar to, or more stringent than the emission guidelines, averaged over the 3-year ICR period (10/3=3).

^eBurden based on 3 FTEs per state to develop, submit, and implement state plans.

^fRespondents include 20 states not expected to have existing requirements similar to the emission guidelines, averaged over the 3-year ICR period (20/3=7).

^gRespondents include the 1 state (HI) expected to submit a one-time negative declaration, averaged over the 3-year ICR period (1/3=0.3).

Nationwide Respondent Assumptions

Respondents	No.	Notes
Total no. respondents	50	49 states, DC
No. expected to submit individual state plan for compressor stations only	20	States with compressor stations only.
No. of all other states expected to submit state plan	30	States expected to have gas/oil production during the 3-yr ICR period.
No. expected to have existing regulations/programs in place	10	States with requirements at least as stringent as those in 40 CFR part 60, subpart OOOOc.
No. expected to submit negative declaration	1	HI

^a The lower bounds account for states expected to regulations and programs in place that are similar to, or more stringent than 40 CFR part 60, subpart OOOOc emission guidelines and would require less burden to develop the state plan. By accounting for existing programs, the burden estimates in Exhibit 1a are lower than those in Exhibit 1b.

^b Tribes expected to rely on federal plan.

Respondent Labor Rates

Labor Category	Respondent Labor Rates (May 2021)		
	Unloaded	Overhead Multiplier (110%)	Loaded
States ^a			
Technical	\$43.28	2.1	\$90.89
Managerial	\$48.41	2.1	\$101.66
Clerical	\$21.79	2.1	\$45.76
Composite			\$115.80

^a Unloaded labor rates from U.S. Department of Labor, Bureau of Labor Statistics, Occupational Employment Statistics, May 2021 National Industry-Specific Occupational Employment and Wage Estimates, NAICS 999200 - State Government, excluding schools and hospitals (OES Designation) <https://www.bls.gov/oes/current/naics3_999000.htm>

Recordkeeping/Reporting Supplies (Annual O&M Costs)

Supply Item	Price per Item	Number per Respondent	Number of Respondents	Total
File cabinet to store hard copy records	\$235	1	50	\$11,750
Miscellaneous annual supplies	\$500	1	50	\$25,000
Average Annual Cost				\$36,750

^a Costs based on estimates in the supporting statement for Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units supporting statement (EPA-HQ-OAR-2013-0602-36879).

^b Respondents include all 50 states with state plans.

Exhibit 1b. Upper Bound Respondent Burden and Cost of Reporting and Recordkeeping Requirements for States, Emissions Guidelines for Greenhouse Gas Emissions from Existing Crude Oil and Natural Gas Facilities (40 CFR Part 60, Subpart OOOOc)

Burden Item	(A) Hours/ Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent/Year (A x B)	(D) Respondents/ Year	(E) Total Hours/Year (C x D)	(F) Technical Hours/Year (E x 0.79)	(G) Managerial Hours/Year (E x 0.09)	(H) Clerical Hours/Year (E x 0.12)	(I) Cost/Year
1. REPORTING REQUIREMENTS									
A. Read and Understand Rule Requirements	Incl. in 1B								
B. Required Activities									
Develop final plan									
States w/compressor stations only ^{a,b}	1,040	1	1,040	7	6,933	5,477	624	832	\$878,523
Other States ^{c,d}	6,240	1	6,240	10	62,400	49,296	5,616	7,488	\$7,906,705
C. Create Information	Incl. in 1B								
D. Gather Information	Incl. in 1B								
E. Report Preparation									
Develop final plan	Incl. in 1B								
Negative declaration ^e	1	1	1	0.3	0	0	0	0	\$42
AVERAGE ANNUAL LABOR BURDEN AND COST					69,333	54,773	6,240	8,320	\$8,785,270
AVERAGE ANNUALIZED COSTS (O&M) (Reporting/recordkeeping supplies)									\$36,750

^aBurden based on 0.5 FTEs per state to develop, submit and implement state plans.

^bRespondents include 20 states expected to develop, submit, and implement a state plan for compressor stations only, averaged over the 3-year ICR period (20/3=7).

^cBurden based on 3 FTEs per state to develop, submit, and implement state plans.

^dRespondents include 30 states not expected to have existing requirements similar to the emission guidelines, averaged over the 3-year ICR period (20/3=7).

^eRespondents include the 1 state (HI) expected to submit a one-time negative declaration, averaged over the 3-year ICR period (1/3=0.3).

Nationwide Respondent Assumptions

Respondents	No.	Notes
Total no. respondents	50	49 states, DC
No. expected to submit individual state plan for compressor stations only	20	States with compressor stations only.
No. of all other states expected to submit state plan	30	States expected to have gas/oil production during the 3-yr ICR period.
No. expected to submit negative declaration	1	HI

^a Tribes expected to rely on federal plan.

Respondent Labor Rates

Labor Category	Respondent Labor Rates (May 2021)		
	Unloaded	Overhead Multiplier (110%)	Loaded
States ^a			
Technical	\$43.28	2.1	\$90.89
Managerial	\$48.41	2.1	\$101.66
Clerical	\$21.79	2.1	\$45.76
Composite			\$115.80

^aUnloaded labor rates from U.S. Department of Labor, Bureau of Labor Statistics, Occupational Employment Statistics, May 2021 National Industry-Specific Occupational Employment and Wage Estimates, NAICS 999200 - State Government, excluding schools and hospitals (OES Designation) <https://www.bls.gov/oes/current/naics3_999000.htm>

Recordkeeping/Reporting Supplies (Annual O&M Costs)^a

Supply Item	Price per Item	Number per Respondent	Number of Respondents	Total
File cabinet to store hard copy records	\$235	1	50	\$11,750
Miscellaneous annual supplies	\$500	1	50	\$25,000
Average Annual Cost				\$36,750

^a Costs based on estimates in the supporting statement for Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units supporting statement (EPA-HQ-OAR-2013-0602-36879).

^b Respondents include all 50 states with state plans.

Exhibit 1c. Summary of Respondent Burden and Cost of Reporting and Recordkeeping Requirements for State Guidelines for Greenhouse Gas Emissions from Existing Crude Oil and Natural Gas Facilities (40 CFR Part 60, Subpart O)

Summary of Annual Respondent Burden and Cost

Totals	Annual Labor Burden (Hours)	Annual Labor Costs	Annualized Capital Costs	Annual O&M Costs
Lower Bound Estimate				
3-Year Total	166,400	\$21,084,672	\$0	\$110,250
Average Annual	55,467	7,028,224	\$0	\$36,750
Average Annual per Respondent	1,109	\$140,564	\$0	\$735
Upper Bound Estimate				
3-Year Total	208,000	\$26,355,809	\$0	\$110,250
Average Annual	69,333	8,785,270	\$0	\$36,750
Average Annual per Respondent	1,387	\$175,705	\$0	\$735

^a Equal to average annual estimate for each burden item in Exhibit 1a divided by the number of respondents in Exhibit 1a

^b Equal to average annual estimate for each burden item in Exhibit 1b divided by the number of respondents in Exhibit 1b

Summary of Responses

Information Collection Activity	Occurrence per Respondent	Respondents	Total Responses	Average Annual
REPORT REQUIREMENTS				
State plan	1	50	50	
3-Year Total Responses			50	

Exhibit 2a. Burden and Cost to the Agency, Emissions Guidelines for Greenhouse Gas Emissions from Existing Crude Oil and Natural Gas Facilities (40 CFR Part 60, Subpart OOOOc)

Activity	(A) Hours/ Occurrence	(B) Occurrences/ Respondents/ Year	(C) Hours/ Respondent/ Year (A x B)	(D) Respondents/ Year	(E) EPA Total Hours/Year (C x D)	(F) EPA Technical Hours/Year (E x 0.79)	(G) EPA Managerial Hours/Year (E x 0.09)	(H) EPA Clerical Hours/Year (E x 0.12)	(I) Cost, \$
1. SUPPORT/OUTREACH									
EPA Headquarters									
States w/compressor stations only ^a	52	1	52	20	1,040	822	94	125	\$72,260
Other States ^b	208	1	208	30	6,240	4,930	562	749	\$433,561
EPA Regions ^c	21	1	21	50	1,040	822	94	125	\$58,473
2. REPORT REVIEW ^d									
Review negative declarations ^e	1	1	1	0.3	0.33	0.26	0.03	0.04	\$19
Coordination on submitting state plans ^f	160	1	160	17	2,667	2,107	240	320	\$185,283
Review notifications of public hearings on plans ^g	2	1	2	17	33	26	3	4	\$2,316
Review certifications that public hearings on plans conducted according to subpart Ba procedures ^g	2	1	2	17	33	26	3	4	\$2,316
Review/approve plans									
States w/compressor stations only ^h	160	1	160	7	1,067	843	96	128	\$59,972
Other States ⁱ	1,040	1	1,040	10	10,400	8,216	936	1,248	\$584,730
AVERAGE ANNUAL LABOR BURDEN AND COST					22,520	17,791	2,027	2,702	\$1,398,930
AVERAGE ANNUAL OTHER DIRECT COSTS									
Miscellaneous cost (e.g., telephone, photocopies, postage)									\$1,000
TOTAL AVERAGE ANNUAL COST (Average Annual Labor Cost + Average Annual Other Direct Costs)									\$1,399,930

^a Assumes 0.5 FTEs per year to oversee the entire program and help with outreach/state/enforceability questions and regional assistance for states with compressor stations only, divided by the total number of respondents.

^b Assumes 3 FTEs per year to oversee the entire program and help with outreach/state/enforceability questions and regional assistance, divided by the total number of respondents.

^c Assumes 2 hours per week of outreach per EPA Region, divided by the total number of respondents.

^d One-time activities, averaged over the 3-year ICR period.

^e Respondents include the 1 state (HI) expected to submit a one-time negative declaration, averaged over the 3-year ICR period (1/3=0.3).

^f Assumes 4 weeks to coordinate with states to advise on their development of state plans and extension requests; respondents include 50 states, averaged over the 3-year ICR period (50/3=16.7).

^g Includes all 50 states for which a state plan was developed, averaged over the 3-year ICR period (50/3=16.7).

^h Assumes 4 weeks for EPA Regions to review each state plan for states with compressor stations only, with some coordination with EPA Headquarters; respondents for this one-time activity averaged over the 3-year ICR period (4 weeks/3 years=1.33).

ⁱ Assumes 6 full months for EPA Regions to review each state plan, with some coordination with EPA Headquarters; respondents for this one-time activity averaged over the 3-year period (30/3=10).

EPA Staff Labor Rates

Labor Category	Labor Rates (2022)		
	Unloaded ^a	Overhead Multiplier (60%)	Loaded
EPA Headquarters			
Technical (Grade 13, Step 5)	\$44.10	1.6	\$70.56
Managerial (Grade 15, Step 5)	\$61.30	1.6	\$98.08
Clerical (Grade 9, Step 5)	\$25.58	1.6	\$40.93
EPA Regions			
Technical (Grade 12, Step 5)	\$34.54	1.6	\$55.26
Managerial (Grade 15, Step 5)	\$61.30	1.6	\$98.08
Clerical (Grade 7, Step 5)	\$19.47	1.6	\$31.15

^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

Other Direct Costs

Expense Item	Cost
Miscellaneous cost (e.g., telephone, photocopies, postage)	\$1,000

^a Costs based on estimates in the supporting statement for Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units supporting statement (EPA-HQ-OAR-2013-0602-36879).

**Exhibit 2b. Summary of Agency Burden and Cost, Emissions Guidelines for
Greenhouse Gas Emissions from Existing Crude Oil and Natural Gas Facilities
(40 CFR Part 60, Subpart OOOOc)**

Totals	Total Annual Labor Burden (Hours)	Annual Costs
3-Year Total	67,561	\$4,199,789
Average Annual	22,520	\$1,399,930

Average Annual Agency Hour Burden per Response = \$1,351

Average Annual Agency Cost Burden per Response = \$83,996