



U.S. Energy Information Administration

Office of Energy Statistics

Office of Oil, Gas, and Coal Supply Statistics

Supporting Statement for Survey Clearance

U.S. Energy Information Administration's (EIA) Oil and Gas Reserves System Surveys:

Form EIA-23L, Annual Report of Domestic Oil and Gas Reserves (County Level Report) – Revision

Form EIA-23S, Annual Report of Domestic Oil and Gas Reserves (Summary Report) – Continuation of Suspension

Form EIA-64A, Annual Report of the Origin of Natural Gas Liquids Production – Extension of Collection without change

OMB No. 1905-0057

Part A:

Background and Proposal

Original Date: December 2015

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INTRODUCTION

The U.S. Energy Information Administration (EIA) is the statistical and analytical agency within the U.S. Department of Energy. EIA collects, analyzes, and disseminates independent and impartial energy information to promote sound policymaking, efficient markets, and public understanding of energy and its interaction with the economy and the environment. EIA is the nation's premier source of energy information and, by law, its data, analyses, and forecasts are independent of approval by any other officer or employee of the U.S. Government.

Request is made for approval of the Energy Information Administration's (EIA) Oil and Gas Reserves System Surveys (OMB No. 1905-0057). These surveys are:

- EIA 23L, *Annual Report of Domestic Oil and Gas Reserves, County Level Report*
- EIA-23S, *Annual Report of Domestic Oil and Gas Reserves, Summary Report*
- EIA-64A, *Annual Report of the Origin of Natural Gas Liquids Production*

CHANGES

This information collection request is for a three-year extension with changes to Form EIA-23L and a three-year extension of Form EIA-64A and Form EIA-23S without changes.

The proposed changes to Form EIA-23L include: altering the title of the form to replace “survey” (which suggests non-mandatory participation or telemarketing) with “report”; collect additional contact, parent company, and affiliate/subsidiary company identification information; collect operated proved reserves, production, and related data **by county**, instead of **by field**; collect producing oil and gas well count data by county; combine three data elements of annual proved reserves data (extensions, new field discoveries, and new reservoir discoveries in old fields) into one combined category named *extensions and discoveries*; and alter the category codes of selected state/subdivisions to improve clarity to respondents, specifically in Alaska, California, Federal Offshore waters (Arctic, Atlantic, Gulf of Mexico, and Pacific), Louisiana, New Mexico, and Texas.

The proposed changes to Form EIA-23L are estimated to decrease total reporting burden hours for respondents because they reduce the level of detail needed to complete the report. In 2014 there were 3,007 counties, 64 parishes, 19 organized boroughs, 11 census areas, 41 independent cities, and the District of Columbia for a total of 3,143 counties and county-equivalents in the United States. In the 2014 EIA Field Code Master List, there were 66,350 individual entries for State/Field Names, not including the multiple WILDCAT or UNKNOWN field records reported annually. Reporting reserves and production data by county total is anticipated to reduce the time required to complete the form by reducing the number of individual entries in Line 2.1 that collects individual field-level data on the current Form EIA-23L. In the existing Form EIA-23L, operators whose fields crossed county lines report subdivided estimates on a geographic basis, so no additional burden is expected for operators with large fields crossing multiple counties.

A. JUSTIFICATION

A.1 Legal Authority

The authority for this mandatory data collection is provided by the following provisions:

- (a) Section 13(b), 15 U.S.C. 772(b), of the Federal Energy Administration Act of 1974 (FEA Act), Public Law 93 275, states:

"All persons owning or operating facilities or business premises who are engaged in any phase of energy supply or major energy consumption shall make available to the (Secretary) such information and periodic reports, records, documents, and other data, relating to the purposes of this Act, including full identification of all data and projections as to source, time and methodology of development; as the (Secretary) may prescribe by regulation or order as necessary or appropriate for the proper exercise of functions under this Act."

- (b) Section 5(b), 15 U.S.C. 764(b), of the FEA Act, states that to the extent authorized by Section 5(a), the (Secretary) shall:

(2) ...Assess the adequacy of energy resources to meet demands in the immediate and longer range future for all sectors of the economy and for the general public;...

(9) ...collect, evaluate, assemble, and analyze energy information on reserves, production, demand, and related economic data;...

(12) ...perform such other functions as may be prescribed by law."

- (c) As the authority for invoking Section 5(b), above, Section 5(a), 15 U.S.C. 764(a), of the FEA Act in turn states:

"Subject to the provisions and procedures set forth in this Act, the (Secretary) shall be responsible for such actions as are taken to assure that adequate provision is made to meet the energy needs of the Nation. To that end, he shall make such plans and direct and conduct such programs related to the production, conservation, use, control, distribution, rationing, and allocation of all forms of energy as are appropriate in connection with only those authorities or functions...

(a) ...specifically transferred to or vested in him by or pursuant to this Act...

(c) ...otherwise specifically vested in the (Secretary) by the Congress."

- (d) Authority for invoking Section 5(a) of the FEA Act is provided by Section 52, 15 U.S.C. 790a, of the FEA Act which states that the Administrator of the EIA:

"...(Shall) establish a National Energy Information System which shall ... contain such information as is required to provide a description of and facilitate analysis of energy supply and consumption...

"(b) ...the System shall contain such energy information as is necessary to carry out the Administration's statistical and forecasting activities, ..., such energy information as is required to define and permit analysis of –

- (1) the institutional structure of the energy supply system including patterns of ownership and control of mineral fuel and nonmineral energy resources and the production, distribution, and marketing of mineral fuels and electricity;
- (2) the consumption of mineral fuels, nonmineral energy resources, and electricity by such classes, sectors, and regions as may be appropriate for the purposes of this Act;
- (3) industrial, labor, and regional impacts of changes in patterns of energy supply and consumption."

A.2 Needs for and Uses of the Data

The information provided by the Oil and Gas Reserves System (OGRS) data collections is used by the Department of Energy as input into the following web products issued by EIA:

- *U.S. Crude Oil and Natural Gas Proved Reserves Annual Report*, http://www.eia.doe.gov/oil_gas/natural_gas/data_publications/crude_oil_natural_gas_reserves/cr.html
- *Natural Gas Monthly*, <http://www.eia.gov/naturalgas/monthly>
- *Monthly Energy Review*, <http://www.eia.gov/emeu/mer/contents.html>
- *Annual Energy Outlook*, <http://www.eia.gov/forecasts/aeo/er/>
- *Short-Term Energy Outlook*, <http://www.eia.gov/forecasts/steo/>

Form EIA-23L provides credible, verifiable national and regional data on the proved reserves and production of crude oil, and natural gas. These data are the basis for EIA's estimates of proved reserves and production for crude oil, lease condensate, and natural gas by state and federal offshore regions.

Form EIA-64A provides data that are used to estimate the yield of natural gas plant liquids from total natural gas production by state and federal offshore regions. Data collected are plant and respondent identification, origin of natural gas received and natural gas liquids produced, plant fuel use, and gas shrinkage resulting from natural gas liquids extracted.

These data are used by EIA in many reports and analysis that discuss crude oil and natural gas reserves and production. The EIA-64A data is used for generating estimates of EIA's dry natural gas production (natural gas that remains after natural gas liquids are extracted). The estimate for production of total natural gas plant liquids (NGPL) generated from the EIA-64A data is used by EIA to calculate the extraction loss from wet natural gas production so that EIA may accurately estimate dry natural gas production. All EIA publications are available on EIA's Internet site (<http://www.eia.gov>).

Every year the Oil and Gas Journal (<http://www.ogj.com/index.cfm>) publishes the reserves estimates from the EIA-23 as the official reserve estimates for the U.S. as part of their coverage of international crude oil reserves. Both the Forms EIA-23 and EIA-64A data series are also widely used in the petroleum industry by consultants and the trade press. Recent articles citing EIA proved reserves (Form EIA-23) data include:

- November 23, 2015 Oil and Gas Journal: *US crude oil reserves increase on 6-year trend* <http://www.ogj.com/articles/2015/11/us-crude-oil-reserves-increase-on-6-year-trend.html>
- December 16, 2015 Petro Global News: *EIA: U.S. crude reserves jumped to 42 year high in 2014* <http://petroglobalnews.com/2015/11/eia-u-s-crude-reserves-jumped-9-percent-in-2014/>
- November 23, 2015 Reuters: *Shale drilling boosted U.S. oil and gas reserves in 2014: EIA* <http://www.reuters.com/article/us-usa-energy-reserves-idUSKBN0TC2BJ20151123>
- November 23, 2015 RIGZONE: *EIA: Shale drilling boosted US oil, gas reserves in 2014* http://www.rigzone.com/news/oil_gas/a/141760/EIA_Shale_Drilling_Boosted_US_Oil_Gas_Reserves_In_2014
- November 27, 2015 Market Realist: *How lower crude oil prices could affect crude oil reserves* <http://marketrealist.com/2015/11/lower-crude-oil-prices-affect-crude-oil-reserves>

The data series from these surveys provide additional benefits, such as:

- Fulfilling EIA's mission to provide credible, reliable, and timely energy information
- Providing a data base for use in forecasting, policy making, planning and analysis activities
- Serving as an official data bank available to Congress and other government agencies on the proved reserves of crude oil, natural gas, and natural gas liquids in the United States
- Providing a source of data for other government agencies, business firms, trade associations, and private research and consulting organizations for analysis, projections, and monitoring purposes.

A.3 Use of Information Technology

In an effort to reduce respondent burden, multiple reporting options for the Forms EIA-23L and EIA-64A are provided.

Respondents may file their Form EIA-23L using software available on the EIA website as a download. This electronic system is called “Reserves Information Gathering System” (RIGS). This software may be accessed from the web page for EIA survey forms at <http://www.eia.gov/survey/#eia-23l>. In the rare instance where an operator cannot successfully download or install RIGS software, the operator can request from EIA a CD-ROM version of the RIGS application.

EIA provides Adobe Acrobat (PDF) file format versions of all the OGRS survey forms and instructions on EIA’s website. Respondents may print the materials, complete them, and return them to EIA via U.S. Mail or fax. A file created by the RIGS software can be sent by secure file transfer.

EIA provides spreadsheet versions of the EIA-64A on its website. Survey respondents may download this version, complete it, and return it to EIA by Secure File Transfer, email, fax, or U.S. mail.

A.4 Efforts to Reduce Duplication

There are not any independent, reliable, and accurate data that can serve as a substitute for the information collected on the OGRS surveys.

Several sources collect production data of natural gas and crude oil from the same respondents, but this data cannot replace the collection of production data on the EIA-23 because it is critical that the production numbers collected reflect production from the reported reserves (See Supporting Statement Part B). Matching reserves numbers reported on the EIA-23 to production numbers collected from another source would be invalid due to changes in operator holdings and estimates over time.

Information from state, federal, or commercial listings of oil and gas well operators does not provide the information that the OGRS data collections provide. Currently, state agencies do not collect proved reserves information from oil and/or gas well operators.

The Department of the Interior (DOI) and Bureau of Land Management (BLM) do not collect proved reserves information – their data collection is on acreage of federal land leased, drilling permits issued, and production from leases on federal land. The DOI Bureau of Ocean Energy Management (BOEM) collects proved reserves and water depth information on developments in the Federal Offshore region, but embargoes the release of proved reserves data for at least 3 years. Because of the limited geographic coverage and the delay in releasing reserves data, the DOI information is not an acceptable alternative to the Form EIA-23L survey.

Oil and gas well operators who are publically-owned companies are required to file their estimate of proved reserves with the Securities and Exchange Commission (SEC). However, these SEC estimates of proved

reserves are not sufficient to replace EIA's estimates for the entire U.S., because only publically-held companies file with the SEC (many operators in the U.S. are privately-owned), and the companies report to the SEC only the percentage of the reserves they own, which can be an amount significantly less than the total volume of reserves they operate.

EIA has determined that other sources of proved oil and gas reserve data cannot replace or approximate the information provided by the OGRS data collections, because of differences in classifying the data, inconsistent data quality, incomplete and infrequent reporting, and data unavailability. Form EIA-64A solicits annual data separated by area of origin not required on Form EIA-816, *Monthly Natural Gas Liquids Report*. Form EIA-64A does not replace or supersede Form EIA-816 that is still required on a monthly basis.

A.5 Burden Reduction for Small Entities

The largest respondents to the Form EIA-23L may have roughly 1,000 fields, while the smallest respondents will have five or fewer. The proposed switch to county-level reporting is expected to reduce the time to complete Form EIA-23L by about 6% for large operators. The new reporting burden for the remaining small operators combined, is slightly less than the old burden for all small operators because the number of entries on Line 2.1 on Form EIA-23L is expected to be similar, but reporting production estimates by county should be less burden than field-level estimates for small operators.

A.6 Consequences of Less Frequent Data Collection

Less frequent reporting from survey respondents would not permit EIA to meet its mandate of providing timely, reliable information on oil and gas reserves.

A.7 Compliance with 5 CFR 1320.6

The data are being collected consistent with the guidelines in 5 C.F.R. 1320.6, to reduce the public's paperwork burden.

A.8 Summary of Consultations outside the Agency

A request for comments from interested persons was published in the Federal Register / Vol. 80, No. 178 / Tuesday, September 15, 2015 / Notices / pp. 55347-55349. In addition, EIA consulted with relevant major industry organizations in the development of the proposed revision of Form EIA-23L as follows:

- August 2015: Attended *Reserves Estimation Unconventional* Conference in Houston, Texas and discussed proposed changes to Form EIA-23L in networking sessions with other attendees.
- November 2015: Requested comments via email from all respondents who filed data with EIA on Form EIA-23L as part of the 2014 survey year data collection.

Comments from 11 parties were received in response to EIA outreach efforts. These comments, along with EIA's responses, are included as Appendix A to this document.

A.9 Remuneration

Payments or gifts will not be provided to respondents as incentives to report data to EIA.

A.10 Disclosure of Information

Form EIA-23L

The annual data on the production of crude oil, lease condensate, and natural gas reported on Form EIA-23L are considered public information and may be released in company-identifiable form. All other information reported on Form EIA-23L will be protected and not disclosed to the public, to the extent that the information satisfies the criteria for exemption under the Freedom of Information Act (FOIA), 5 U.S.C. §552, the DOE regulations, 10 C.F.R. §1004.11, implementing the FOIA, and the Trade Secrets Act, 18 U.S.C. §1905.

The Federal Energy Administration Act requires EIA to provide company-specific data to other federal agencies when requested for official use. The information reported on the Form EIA-23L may also be made available, upon request, to another component of the Department of Energy (DOE); to any Committee of Congress, to the Government Accountability Office, or to other federal agencies authorized by law to receive such information. A court of competent jurisdiction may obtain this information in response to an order. The information may be used for any non-statistical purposes such as administrative, regulatory, law enforcement, or adjudicatory purposes.

Disclosure limitation procedures are applied to the protected statistical data published from Form EIA-23L to ensure that the risk of disclosing identifiable information is very small.

Information collected on Form EIA-23L may be provided to United States Department of the Interior offices (BOEM and the United States Geological Survey [USGS]) for statistical purposes, only, in conducting their resource estimation activities.

Form EIA-64A

The data reported on Form EIA-64A will be protected and not disclosed to the public, to the extent that it satisfies the criteria for exemption under the Freedom of Information Act (FOIA), 5 U.S.C. §552, the DOE regulations, 10 C.F.R. §1004.11, implementing the FOIA, and the Trade Secrets Act, 18 U.S.C. §1905.

The Federal Energy Administration Act requires EIA to provide company-specific data to other federal agencies when requested for official use. The information reported on this form may also be made available, upon request, to another component of the Department of Energy (DOE); to any Committee of Congress, the Government Accountability Office, or to other federal agencies authorized by law to receive such information. A court of competent jurisdiction may obtain this information in response to an order. The information may be used for any non-statistical purposes such as administrative, regulatory, law enforcement, or adjudicatory purposes.

Disclosure limitation procedures are applied to the statistical data published from Form EIA-64A survey information to ensure that the risk of disclosing identifiable information is very small.

Identifiable information collected on Form EIA-64A may be provided to United States Department of Interior offices (BOEM and USGS) for statistical purposes, only, in conducting their resource estimation activities.

A.11 Justification for Sensitive Questions

There are not any questions of a sensitive nature in the OGRS data collections.

A.12 Reporting Burden Estimates

Based on preliminary cognitive research with survey respondents, EIA expects the reporting burden to slightly decrease based on the proposed change to report reserves information at the county level.

The overall annual burden for the OGRS data collections is estimated to be 32,850 hours. This total is a combined total for Form EIA-23L and Form EIA-64A based on the per response burden hours shown in the two tables below. For the EIA-23L that is 97 hours per response for the largest producers by volume (an estimated 160 respondents), and 36 hours per response for mid-sized producers (an estimated 320 respondents). The burden estimate for small producers (an estimated 170 respondents) is 13 hours per response. This estimate was based on the profile of small producers and the average number of fields to be reported per response, which, at 13 hours per response, is less than half the 36 hours of burden per response from each mid-sized producer.

EIA conducted nine interviews with current EIA-23L respondents during October 25-30, 2015. Companies that participated in the interviews were selected based on the volumetric size of their production operations. Three companies were selected from three categories: large size companies defined as annual production greater than 1.5 million barrels of crude oil, or 15 billion cubic feet of natural gas; medium size companies defined as annual production between 400 thousand barrels of oil, or 2 billion cubic feet of natural gas, and 1.5 million barrels of crude oil, or 15 billion cubic feet of natural gas; and small size companies defined as annual production less than 400 thousand barrels of crude oil, or 2 billion cubic feet of natural gas.

Overall the interviews showed that there was a wide variation in the reporting burden based on the size of the company. Respondents also indicated that reporting data at the county level, instead of field level, would decrease the reporting burden associated with the EIA-23L survey. The interviews also showed that much of the response burden was attributed to the Reserve Information Gathering System (RIGS) online tool used by respondents to fill out the survey. Based on this research, EIA decreased the reporting burden by large size companies from the old estimate of 120 hours to 97 hours, decreased the reporting burden for medium size companies from 40 to 36 hours, and decreased the old reporting burden for small size companies from 15 to 13 hours. See Section A.15 for a listing of the old burden estimates. The average reporting burden of 45 hours shown in the table below is a weighted average of the reporting burden associated with these three size categories.

Operator Size	Number of Responses	Hours per Response	Burden hours
Large	160	97	15,520
Midsized	320	36	11,520
Small	170	13	2,210
Subtotal	650		29,250
Average per Response: 45 hours per response			

Form EIA-64A Natural Gas Plant Operators	Number of Respondents surveyed per year	Burden hours per response to complete Form EIA-64A	Annual Burden hours
Census of U.S. Plants	600	6.0 hours	3,600

There are 600 respondents to the EIA-64A, with a per response burden of 6 hours. This results in a total aggregate across the three surveys of 1,250 respondents per year with 26.3 hours per response, for a total annual burden of 32,850 hours.

The Table 1 below shows the burden hours calculated for the proposed OGRS surveys package.

Table 1: OGRS Surveys Burden Information						
EIA Form Number	Title	Number of Respondents	Number of	Total Number of	Burden Hours Per	Annual Burden

		Per Year	Reports Annually	Responses	Response*	Hours
Form EIA-23L	Annual Survey of Domestic Oil and Gas Reserves (County Version)	650	1	650	45.0	29,250
Form EIA-23S (Proposed to be suspended)	Annual Survey of Domestic Oil and Gas Reserves (Summary Version)	0	0	0	0.0	0
Form EIA-64A	Annual Report of the Origin of Natural Gas Liquids Production	600	1	600	6.0	3,600
Total OGRS Surveys		1,250		1,250		32,850

* Note: the Burden Hours per Response is a weighted average across different sizes of respondents.

Table 1: OGRS Surveys Burden Information

A.13 Total Annual Cost to Respondents

The estimated total cost of respondent burden hours is \$2,365,857 (32,850 hours x \$72.02 per hour). An average per hour cost of \$72.02 is used because that is the average loaded (salary plus benefits) cost for an EIA employee. EIA assumes that the survey respondent workforce completing surveys for EIA is comparable with the EIA workforce.

EIA does not believe that respondents incur any additional start-up or operational costs in connection with the OGRS surveys other than the costs associated with the burden hours.

A.14 Annualized Costs to the Federal Government

The annual costs of the OGRS data collections to EIA, including personnel, for development/maintenance, collection, processing, analysis, and publication, are estimated to be \$1,400,000.

A.15 Reasons for Changes in Burden

Total respondent reporting burden for the OGRS data collection, estimated at 32,850 hours, will be reduced by 10,800 hours from the previously-approved OGRS burden hours, because of the reduction in the number of line entries on Schedule A of Form EIA-23L. Also, the proposed sample size for this form is 650 respondents, a reduction of 200 respondents from the sample size of 850 in the previous clearance. There are two reasons for the reduction in sample size: 1) parent companies already in the sample will report for all of their subsidiary companies and 2) the geological provinces used to define estimation groups were modified

to meet the target relative standard errors (RSEs) with a lower sample size. As described above in A.12, EIA conducted cognitive research concerning the burden hour estimate for researching and completing Form EIA-23L and concluded that the burden hour should be reduced from 47.1 hours per respondent down to 45 hours per respondent. The EIA cognitive research report has been uploaded to this information collection request to provide additional information to the public regarding this burden estimate change. The total burden for respondents to Form EIA-64A remains the same because no changes are proposed to the form.

Old Form EIA-23L Operator Size	Old Number of Respondents surveyed per year	Old Burden hours per response to complete Form EIA-23L	Old Annual Burden hours
Largest producers by volume	160	120 hours	19,200
Mid-sized producers	420	40 hours	16,800
Small producers	270	15 hours	4,050
	850		40,050

The following tables summarize the changes to annual respondent reporting burden:

Table 2: OGRS Surveys Change in Annual Burden

Table 2: OGRS Surveys Change in Annual Burden								
EIA Form and Title	Old Number of Respondents Per Year	New Number of Respondents Per Year	Old Number of Annual Responses	New Number of Annual Responses	Change (Annual Responses)	Old Burden (Hours)	New Burden (Hours)	Change (Burden Hours)
Form EIA-23L, "Annual Survey of Domestic Oil and Gas Reserves (County Version)"	850	650	850	650	-200	40,050	29,250	-10,800
Form EIA-23S, "Annual Survey of Domestic Oil and Gas Reserves (Summary Version)"	0	0	0	0	0	0	0	0
Form EIA-64A, "Annual Report of the Origin of Natural Gas Liquids Production"	600	600	600	600	0	3,600	3,600	0
Total OGRS Surveys	1,450	1,250	1,450	1,250	-(200)	43,650	32,850	-(10,800)

A.16 Schedule for Collecting and Publishing Data

Plans to tabulate and publish data collected by the OGRS surveys are as follows:

Approximate Time Survey Forms are Initially Made Available:

Item	Date*
EIA 64A	February
EIA 23L (County-level version)	March

Due Date for Response:

Item	Date:
EIA 64A	April
EIA 23L (Field-level version)	May
Final data for tabulation (EIA-64A)	June
Final data for tabulation (EIA-23)	October 31

Publication Schedule:

Item	Date:
Reserves Report	November
Supporting materials	December

A.17 OMB Number and Expiration Date

The OMB approval expiration date and OMB number will be displayed on all of the Oil and Gas Reserves System survey forms (Forms EIA-23L, EIA-23S, and EIA-64A).

Appendix A: Comments on Proposed Changes

The following people responded to the EIA Request for Comments on our proposed changes to Form EIA-23L:

Steve Hought, Statoil Corporation STHAUGH@statoil.com

Bruce Cocek, Basa Resources, Inc. 214-580-5279 bcocek@basaresources.com

Douglas Schafer, 713-621-2242 dschafer@offshoreservicesllc.com
Production Operations Manager, Offshore Services LLC

Vickie Tyler, 817-334-7822 vt Tyler@mpartners.com
Engineering Technician, Morningstar Partners

Claudia Catchings, 713-296-7141 Claudia.Catchings@apachecorp.com
Economics Coordinator, Apache Corporation

J. Mike Drennen, 405-232-9700 miked@crawleypetroleum.com
Vice President, Crawley Petroleum Corporation

Linda Morgan, 214-206-9537 LMorgan@coveypark.com
Senior Engineering Analyst, Covey Park Energy

James H. (Jim) Etherton 713-366-5534 James.Etherton@oxy.com
Senior Reserves Advisor, Occidental Petroleum Corporation

Ann Roberts 361-888-4792 aroberts@royalcctx.com
Royal Production Company, Inc.

Lesley Schaaff, 202-263-1012 lschaaff@hess.com
Senior Manager, Government & External Affairs, Hess Corporation

Jamie Jensen 432-221-0760 JJensen@concho.com
Reservoir Engineering Tech, Concho Resources, Inc.

The most common positive comment is agreement that reducing the reporting level from field-level to county-level should reduce the burden of completing Form EIA-23L.

The most common negative comment is that changing any part of the process carries with it an associated capital cost to implement it. They want as few changes as necessary and up to an additional year to implement the final changes.

Steve Haught, Statoil Corporation

Comments: Is in favor of the change in reporting level by county instead of by field.

Response: Replied via email to acknowledge submission 11/17

Bruce Cocek, Basa Resources, Inc.

Comments: Wanted to know if the changes were for the 2015 collection and requested more time to review and comment on the proposal.

Response: Replied via email on 11/17 to explain that the changes proposed were for the 2016 collection and were not in effect. Extended time to review and reply until 12/ 10

Douglas Schafer, Production Operations Manager, Offshore Services LLC

Comments: Was unsure of the intent of the outreach email.

Response: Replied via email on 11/17 to explain that the intent of the email was outreach for proposed changes and not a request for resubmission of 2014 data.

Vickie Tyler, Engineering Technician, Morningstar Partners

Comments: The proposed change in the level of reporting from field to county-level would be helpful and less of a burden in filing.

Response: Replied via email to acknowledge submission 12/11

Claudia Catchings, Economics Coordinator, Apache Corporation

Comments: When would the proposed changes go into effect?

Response: Replied via email on 11/17 to explain that changes would go into effect if approved by the Office of Management and Budget and would apply to our 2016 data collection beginning in February 2017.

J. Mike Drennen, Crawley Petroleum Corporation

Comments: EIA's estimate of the cost to implement our proposed changes is wrong. It does not take into account the time and personnel needed to alter computerized filing systems that are currently in place. There are always "capital and startup costs".

Response: Replied via email on 12/11 to acknowledge submission of comment.

Linda Morgan, Covey Park Energy

Comments: Likes the changes and predicts a reduction in time required to complete Form EIA-23L.

Response: Replied via email to acknowledge submission 12/11

James H. (Jim) Etherton, Occidental Petroleum Corporation

Comments: Asked for a meeting via telephone to air and discuss the changes.

Response: Arranged a phone conversation on 12/9 with Mr. Etherton. He has concerns about potential computing problems with County Codes and County Names regarding specialty keys, specifically the apostrophe and any code with a leading zero. The apostrophe creates string errors within code written in SQL. With leading zeroes, the Excel spreadsheet program very often drops leading zeroes. He also asked for more detail or examples in the definitions used for Form EIA-23L regarding Type Codes.

Ann Roberts, Royal Production Company, Inc.

Comments: Has no objection to the proposed changes and does not foresee a big difference in their record-keeping practices.

Response: Replied via email to acknowledge submission 12/11

Lesley Schaaff, Hess Corporation

Comments: Submitted a 2-page letter on 11/24 of the concerns and comments of Hess Corporation addressing the proposed changes. Given time and capital costs required to implement our proposed changes, Hess asked that the changes not be implemented until the 2017 data collection (which would begin in February 2018). While active well count data is kept, the number of active wells within a county varies over the course of a year—Hess suggests that EIA allow annual averaging of this data [Note: EIA is considering either an average or a snapshot well count set to a particular day, e.g. December 31.]

Response: Replied via email to acknowledge receipt of the letter 12/11

Jamie Jensen, Concho Resources, Inc.

Comments: Concho is supportive of county-level data collection, and combining the type codes of Shale and Other Low Permeability into one code, Tight, for crude oil. They also expressed support for reducing the four separate fuel types of crude oil, nonassociated natural gas, associated-dissolved natural gas, and lease condensate down to two fuel types; oil and natural gas; and for combining the components of total discoveries (extensions, new field discoveries, and new reservoir discoveries in existing fields) into one category.

Response: Replied via email to acknowledge submission 12/11