

Supporting Statement A for Paperwork Reduction Act Submissions
30 CFR 551, Geological and Geophysical (G&G)
Explorations of the Outer Continental Shelf
Form BOEM-0327
OMB Control Number 1010-0048
Current Expiration Date: February 28, 2018

Terms of Clearance: None.

General Instructions

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

Specific Instructions

A. Justification

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

The Outer Continental Shelf (OCS) Lands Act, as amended (43 U.S.C. 1331 *et seq.* and 43 U.S.C. 1801 *et seq.*), authorizes the Secretary of the Interior to prescribe rules and regulations to administer leasing of mineral resources on the OCS.

The OCS Lands Act (43 U.S.C. 1340) also states that "any person authorized by the Secretary may conduct geological and geophysical explorations in the [O]uter Continental Shelf, which do not interfere with or endanger actual operations under any lease maintained or granted pursuant to this subchapter, and which are not unduly harmful to aquatic life in such area." The section further requires that permits to conduct such activities may only be issued if it is determined that the applicant is qualified; the activities do not result in pollution or create hazardous or unsafe conditions; they do not unreasonably interfere with other uses of the area or disturb a site, structure, or object of historical or archaeological significance. Applicants for permits are required to submit form BOEM-0327 to provide the information necessary to evaluate their qualifications, and, upon approval, respondents are issued a permit (either BOEM-0328 or BOEM-0329). Also, as a Federal agency, we have a continuing affirmative duty to comply with the National Environmental Policy Act (NEPA), Endangered Species Act (ESA), and Marine Mammal Protection Act (MMPA). This includes a substantive duty to carry out any agency action in a manner that is not likely to jeopardize protected species as well as a procedural duty to consult with the Fish and Wildlife Service (FWS) and National Oceanic and Atmospheric Administration Fisheries (NOAA Fisheries) before engaging in a discretionary action that may affect a protected species.

The OCS Lands Act (43 U.S.C. 1352(a)(1)(C)) requires that certain costs be reimbursed to the parties submitting required G&G information and data. Under the OCS Lands Act, permittees are to be reimbursed for the costs of reproducing any G&G data required to be submitted. Permittees are to be

reimbursed also for the reasonable cost of processing geophysical information required to be submitted when processing is in a form or manner required by the Director, BOEM, and is not used in the normal conduct of the business of the permittee.

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

Regulations to carry out these responsibilities are contained in 30 CFR 551 and are the subject of this information collection renewal.

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

BOEM uses the information to identify oil, gas, sulfur, and mineral resources in the OCS; ensure the receipt of fair value for mineral resources; that the exploration activities do not cause harm to the environment, personal harm or unsafe operations and conditions, damage to historical or archaeological sites, or interference with other uses; to analyze and evaluate preliminary or planned drilling activities; to monitor progress and activities in the OCS; to acquire G&G data and information collected under a Federal permit offshore; and to determine eligibility for reimbursement from the government for certain costs. BOEM uses information collected to understand the G&G characteristics of oil- and gas-bearing physiographic regions of the OCS. The information aids the Secretary in obtaining a proper balance among the potentials for environmental damage, the discovery of oil and gas, and associated impacts on affected coastal States. Information from permittees is necessary to determine the propriety of the data and amount of reimbursement.

Form BOEM-0327 is submitted under this subpart to determine if permittees meet the necessary qualifications pertinent to conducting G&G exploration or scientific research.

BOEM-0327—Requirements for Geological and Geophysical Explorations or Scientific Research on the Outer Continental Shelf – Application for Permit to Conduct Geological or Geophysical Exploration for Mineral Resources or Scientific Research on the Outer Continental Shelf (Form Attachment 1) – Nonexclusive Use Agreement for Scientific Research (Form Attachment 2).

This form consists of the requirements for G&G activities requiring Permits or Notices along with the application that the respondent submits to BOEM for approval, as well as a nonexclusive use agreement for scientific research, if applicable. The requirements portion of the form lets the respondents know the authority, requirements, along with other relevant information for the permit.

Attachment 1 of the form, Application for Permit to Conduct Geological or Geophysical Exploration for Mineral Resources or Scientific Research on the Outer Continental Shelf, requires the respondent to fill in pertinent information relating to the company and the type of activity that will be conducted, along with all relevant information.

Attachment 2 of the form, Nonexclusive Use Agreement for Scientific Research on the Outer Continental Shelf, consists of information pertaining to which data and information resulted from the proposed

activity will be made available to the public for inspection; applicant agreement that information obtained will not be sold or withheld for exclusive use; and applicant signs and submits to BOEM for approval.

Upon BOEM approval of the application, respondents are issued a permit using form BOEM-0328 for conducting geophysical exploration for mineral resources or scientific research, or BOEM-0329 for conducting geological exploration for mineral resources or scientific research. These permits are filled in by BOEM and do not incur a respondent hour burden.

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

Currently 85% of all information is submitted electronically in all regions. All reporting during operations is done electronically. Regions receive electronic versions of the forms and all other information, such as plan of operations and the environmental compliance information, required for the application. They also receive the required signed hard copies. The electronic version of the non-proprietary information facilitates sharing with the staff doing the NEPA review. It also saves the regions time as the information is posted on the website very quickly.

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

There is no duplication. The DOI is the agency with specific statutory authority. Respondents are applying for individual permits, and each notice for processing of G&G data is unique, as are requests for reimbursement. There is no similar information available. To the extent that identical information or data were available from prior permits or other sources, BOEM would not require respondents to resubmit such information or data.

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

This regulation could involve small businesses or other small entities if they desire to perform G&G exploration offshore. However, the majority of entities conducting offshore activities are not considered small because of the technical and financial resources needed to carry out such activities. BOEM needs the delineated information to evaluate all applications and notices, regardless of the size of the respondent. The OCS Lands Act and BOEM's implementing regulations (§ 551.13) require us to reimburse respondents for their costs of reproduction and certain processing of data and information that BOEM requests. We also pay respondents if they request reimbursement for food, quarters, or transportation they provide BOEM representatives (§ 551.8(a)) during inspections. These reimbursements eliminate a cost burden on both small and large businesses.

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

Except for status reports, the information is on occasion or as specified in the permits. Therefore, less frequent reporting would not be possible. The frequency of status reports varies according to the permit

specifications. The reports are necessary for resource evaluation and environmental oversight of any survey consequences. If BOEM did not collect the information, the Secretary could not meet the obligations of the OCS Lands Act in a timely manner, possibly resulting in economic losses to the Federal Government.

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

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

Not applicable in this collection.

(b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

Section 551.14(c) and the permit form state that BOEM will provide a notice of intent to disclose data or information to an independent contractor or agent or to an adjacent State. The notice will afford the permittee a period of not less than 5 working days in which to submit comments on the intended action. Industry is aware, through the regulations and the permits, that BOEM may have a contractor reproduce, process, etc., data for a sale evaluation. BOEM may only have 90 days in which to conduct the entire sale. Therefore, if there were any special circumstances, the permittee would need to notify BOEM immediately, which would allow for a longer response time if feasible.

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

Respondents must submit one original, one copy of the original, one digital copy, and one public copy (all with original signatures) of form BOEM-0327. After BOEM approval, one signed original each is needed for the OCS region and the permittee (standard legal agreement); the copies are for the permittee's contractor and the public. The copy for the public, however, will not include some information in item D that is determined to be proprietary data and not subject to release.

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

The permit forms specify that at any time within 10 years after receiving notification of the completion of the acquisition activities conducted under the permit, BOEM may request that the permittee submit for inspection and possible retention all or part of the G&G data and/or information. As a normal business practice, respondents will generally retain acquired G&G data and/or information for a very long time, beyond even the 10-year requirement in the permit forms. This is not an unreasonable retention period for valuable resources data and/or information that BOEM may need at a future date if it conducts a strategic sale or requires data to conduct a national or regional resource assessment.

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

Not applicable in this collection.

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

Not applicable in this collection.

(g) that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

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

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

This collection does not require proprietary, trade secret, or other confidential information not protected by agency procedures.

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

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

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

A Federal Register notice with a 60-day public comment period soliciting comments on this collection of information was published on August 31, 2017 (82 FR 41424). BOEM received two comment letters during the 60-day comment period. One comment from a private citizen was not germane to the PRA. The other comments were received from the American Petroleum Institute and the International Association of Geophysical Contractors on October 30, 2017. Their comments include:

Comment 1: Rather than identifying the specific vessel, may the applicant provide information on the type of vessel that will be used to conduct the survey? BOEM can then proceed with its review of the application. The vessel name can be provided at a later date, and assuming it has similar specifications, further analysis by BOEM would not be necessary. On occasion application submissions are delayed until the contractor/vessel is known, and at other times companies must request a modification to the permit as contractors/vessels change.

BOEM Response: We have added the change to Form BOEM-0327 at A.6 to allow details of the vessel (other than “type”) to be provided at a later date. If the vessel information has not been provided when the permit is ready to be issued, BOEM will notify the permittee that the permit is ready and they will have 30 days to provide the vessel information or their permit will be canceled.

Comment 2: Similarly, may third party notification letters be submitted at a later stage in the process after the application is submitted? At times the application is held up until these letters are completed and distributed.

BOEM Response: Yes, they may be submitted separately from the application, but must be received before the permit will be issued. BOEM is open to discussions with IAGC on this topic.

Comment 3: Can BOEM routinely notify all applicants of form updates? Out of date templates have been used in the past, which ultimately causes delay.

BOEM Response: In accordance with the PRA, this Federal Register notice informs the public of updates on Form BOEM-0327. It is the responsibility of the applicant to ensure they are using the current form. Both the application and permit are clearly marked with a date in the lower left hand corner and state that a form with an earlier date is obsolete. Current fillable forms are available on BOEM's website at <https://www.boem.gov/BOEM-OCS-Operation-Forms/> and forms specific to Geological & Geophysical (G&G) exploration and permitting are posted at <https://www.boem.gov/Oil-and-Gas-Energy-Program/Resource-Evaluation/Regulation-of-Pre-lease-Exploration/GG-Permit-Applications.aspx>.

Comment 4: BOEM has requested comments on whether the information collected was "processed and used in a timely manner". Currently, industry finds the permitting process to be open-ended and uncertain. The Associations recommend that BOEM establish a timeline for permit review and approval, similar to how drilling permits are approved.

BOEM Response: There is no regulatory time frame for processing G&G permits. Internally, for GOM applications BOEM attempts to issue non-airgun high resolution permits, on average, within 40 days and for bottom disturbing and airgun permits, on average, in 70 days. This may vary as a result of work load at the permit processing level and/or at the environmental review level. In addition, the time frames above do not include any additional time required to obtain additional or corrected information from the applicant.

However, for G&G permits in the Atlantic, the applicant must apply and receive an Incidental Harassment Authorization (IHA) from NMFS before the permit will be issued. Because NMFS is an independent agency, with its own regulatory timelines, BOEM has no control over their processes and timelines.

Comment 5: BOEM acknowledges that an application process for a single permit in Alaska or the Atlantic takes 1000 hours to complete, while the same permit application in the Gulf of Mexico (GoM) may take 300 hours. This is a conservative estimate and the time required may be even greater. BOEM explains that this extraordinary burden is related to NEPA and the associated mitigation requirements. However, such a burden is unjustified, especially considering that surveys are routinely conducted without impact in similar environments worldwide. Rather than simply requesting approval for these unjustified burdens, BOEM should instead assess its permitting process and determine how the burdens will be reduced. Such a reduction would be consistent with the purpose of the PRA. The high permitting costs are entirely inconsistent with the low and effectively managed safety and environmental risks from G&G activities.

BOEM Response: OCSLA mandates that all G&G activities on the OCS be conducted in a safe and environmentally sound manner; therefore frontier areas such as Alaska and the Atlantic require additional attention. In accordance with the Trump Administration's executive and secretarial orders, most specifically Executive Order 13783 and Secretarial Order 3350, BOEM has been working with National Marine Fisheries Service (NMFS) to streamline processes and improve efficiencies. Also, Secretarial Order 3358 established the Executive Committee for Expedited Permitting where agencies will evaluate opportunities for expediting and streamlining the permitting process and improve efficiencies.

Comment 6: BOEM also should take steps to reduce the estimated 300-hour burden to apply for G&G permits in the GoM. Thousands of such permits have been issued and the environmental effects have been fully assessed. Mitigating measures have proved effective and should not be changed after a permit is issued. Applying for a GoM permit should be a simple matter of identifying the timing, location, vessel and equipment, and mitigation. Absent special circumstances, the burden could be reduced by 90% without increasing environmental risks.

BOEM Response: The burden hours are used by the applicants to provide BOEM with the appropriate documentation to clearly and completely describe their proposed activity. This information is used by BOEM to ensure a proper understanding of the currently proposed activity and the equipment to be used. This ensures that an appropriate site/activity specific environmental analysis is conducted. Without the descriptive information being provided for each proposed activity (thus the burden hours) BOEM cannot ensure it is fulfilling its statutory obligations under OCSLA and NEPA.

Comment 7: We encourage BOEM to explore the creation of an electronic permit application process. Efficiencies for permit processing and man-hours may be realized through electronic permit applications.

BOEM Response: A web-based process for the electronic submission/issuance of BOEM G&G permitting is being considered for the future. Budgetary options are currently being explored.

Comment 8: Finally, while this ICR addresses BOEM G&G permitting activities, it fails to capture the entire burden needed to conduct G&G activities, which in some cases requires (or may require in the future) authorizations from the National Marine Fisheries Service (NMFS) for incidental take pursuant to the Marine Mammal Protection Act (MMPA) and/or the Endangered Species Act (ESA). For example, for G&G permitting in the Atlantic this is a required part of the process, and the associated burdens should be acknowledged in the ICR. Industry's G&G permitting experience in the Atlantic has shown extreme delays on the part of NMFS. Often applicants are told that a BOEM G&G permit is "ready to be issued" (or has been issued) long before the applicant receives MMPA or ESA authorizations from NMFS upon which the G&G permit is contingent.

BOEM Response: NMFS, not BOEM, has the authority for incidental take authorizations under the MMPA and ESA. Accordingly, the associated ICR burden hours for these authorizations are under the purview of NMFS. As mentioned earlier, BOEM, NMFS, and other Federal agencies are working together to determine how the permitting process might be expedited and streamlined. However, in the final analysis NMFS is an independent agency with its own regulatory timelines and processes.

During the comment period, BOEM requested input from several respondents on the availability of data, frequency of collection, clarity of instructions, and elements being collected. The burden estimates in Section A.12 reflect their input. The following respondents who provided estimates are:

Project Manager, Fugro Marine GeoServices, Inc., 200 Dulles Drive, Lafayette, LA 70506.

Director, Marine Acquisitions, TGS, 10451 Clay Road, Houston, TX 77041.

Geosupport Manager, WesternGeco, 10001 Richmond Avenue, Houston, TX 77042.

Permit and Data Acquisition Division, FairfieldNodal, 1111 Gillingham Lane, Sugar Land, TX 77478.

Project Manager, CGG, 103000 Town Park, Houston, TX 77072.

In addition, to the burden estimates Fugro Marine GeoServices, Inc. included the following comments:

“The two tables presented in Form 327 on Page 11 request information that is not readily available from system manufacturers or operations manuals. The manufactures tend to report Source Levels as rms in dB (dB@1 μ Pa@1m). Peak to Peak is not available. Even when we have the sensors field tested per National Marine Fisheries Incidental “Take” of marine mammals offshore Alaska and the East Coast, this information may not be available for the G&G application. Fugro GeoServices has modified the Energy Source table to include information available for the high frequency systems developed and employed within our AUV’s. A sample table used by FGSI is presented here:

ENERGY SOURCE	Manufacturer	Model	Total Energy Output rms in dB (Source Level).	Frequency Range (Hz-kHz)	Beam Width	Ping Duration/Cycle	Ping Rate
Side Scan Sonar	EdgeTech	AUV-4200	215 dB@1 μ Pa@1m	120 & 410 kHz	along track = 1.5° across track = 158°	120kHz = 20ms 410kHz = 10ms	15-60 pps
Multibeam	Simrad	EM2000	207 dB@1 μ Pa@1m	200 kHz	along track = 0.5° across track = 150°	200 μ s	10 hZ
Subbottom Profiler	EdgeTech	AUV	211 dB@1 μ Pa@1m	2-16 kHz	15° to 25°	20 ms	6-8 pps

The dB level table which requests the minimum distance from the source to a specific dB value appears to only apply to air guns or air gun arrays. Please clarify that is indeed the purpose for this table and that multibeam bathymetry, high frequency subbottom profilers, and side scan sonar systems are not included in this second table. We will plan to insert “not applicable” unless we are running seismic sources, i.e. airguns.”

BOEM Response: BOEM knows the peak-to-peak values are not available for the equipment that some companies use. BOEM recommends these companies put N/A in the columns not applicable. BOEM has added these instructions to page 11 of form BOEM-0327. BOEM is also added Ping Rate to the Energy Source table.

Regarding the dB level table, BOEM has added language to clarify that this table excludes multibeam bathymetry, high frequency subbottom profilers, and side scan sonar systems.

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

The OCS Lands Act mandates that we reimburse respondents for their reproduction and processing costs of certain data and information that BOEM requests. These implementing regulations and permit forms comply with the OCS Lands Act and provide for reimbursement payment of the G&G data and information when applicable. BOEM also pays respondents if they request reimbursement for food, quarters, or transportation they provide BOEM representatives during inspections. We do not provide gifts to respondents.

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

We protect proprietary information according to the Freedom of Information Act (5 U.S.C. 552) and the Department of the Interior’s implementing regulations (43 CFR part 2), and under regulations at 30 CFR 551.

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

The collection does not include sensitive or private questions.

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

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

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

Potential respondents include Federal OCS oil, gas, and sulphur permittees or notice filers. It should be noted that not all of the potential respondents will submit information in any given year and some may submit multiple times. The burden estimates include the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Submissions are generally on occasion, annually, or vary by section or permit. We estimate the total annual burden is 35,254 hours. Refer to the following table for a breakdown of the burdens.

Burden Table

Citation 30 CFR 551	Reporting and Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
		Non-Hour Cost Burden*		
30 CFR 551.1 through 551.6				
551.4(a), (b); 551.5(a), (b), (d); 551.6; 551.7	Apply for permits (form BOEM-0327) to conduct G&G exploration, including deep stratigraphic tests/revisions when necessary. Submit required information in manner specified.	1,000 AK**	4 Applications	4,000
		1,000 ATL & Pacific**	9 Applications	9,000
		300 GOM	55 Applications	16,500
		68 applications X \$2,012 = \$136,816		
551.4(b); 551.5(c), (d); 551.6	File notices to conduct scientific research activities, including notice to BOEM prior to beginning and after concluding activities.	1	1 Notice	1

Citation 30 CFR 551	Reporting and Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
		Non-Hour Cost Burden*		
551.6(b) 551.7(b) (5)	Notify BOEM if specific actions should occur; report archaeological resources (no instances reported since 1982). Consult with other users.	1	1 Notice	1
		Subtotal	70 responses	29,502 hours
			\$136,816 non-hour cost burden	
30 CFR 551.7 through 551.9				
551.7; 551.8	Submit APD and Supplemental APD to BSEE.	Burden included under BSEE regulations at 30 CFR 250, Subpart D (1014-0018).		0
551.7; 551.8(b)	Submit information on test drilling activities under a permit, including required information and plan revisions (e.g., drilling plan and environmental report).	1	1 Submission	1
551.7(c)	Enter into agreement for group participation in test drilling, including publishing summary statement; provide BOEM copy of notice/list of participants (no agreements submitted since 1989).	1	1 Agreement	1
551.7(d)	Submit bond(s) on deep stratigraphic test and required securities	Burden included under 30 CFR Part 556 (1010-0006).		0
551.8(a)	Request reimbursement for certain costs associated with BOEM inspections (no requests in many years).	1	1 Request	1
551.8(b), (c)	Submit modifications to, and status/final reports on, activities conducted under a permit.	38 AK**	4 Respondents x 10 Reports = 40	1,520
		38 ATL**	9 Respondents x 10 Reports = 90	3,420
		2 GOM	55 Respondents x 3 Reports = 165	330
551.9(c)	Notify BOEM to relinquish a permit.	1/2	2 Notices	1
		Subtotal	300 responses	5,274 hours
30 CFR 551.10 through 551.13				
551.10(c)	File appeals.	Exempt under 5 CFR 1320.4(a)(2), (c).		0
551.11; 551.12	Notify BOEM and submit G&G data and/or information collected and/or processed by permittees, bidders, or 3 rd parties, etc., including reports, logs or charts, results, analyses, descriptions, information as required, and agreements, in manner specified.	4	40 Submissions	160
551.13	Request reimbursement for certain costs associated with reproducing data/information.	2	40 Submissions	80
		Subtotal	80 responses	240 hours
30 CFR 551.14				
551.14(a), (b)	Submit comments on BOEM intent to disclose data and/or information to the public.	1	2 Comments	2
551.14(c)(2)	Submit comments on BOEM intent to disclose data and/or information to an independent contractor /agent.	1	2 Comments	2
551.14(c)(4)	Contractor/agent submits written commitment not to sell, trade, license, or disclose data and/or information without BOEM consent.	1	2 Commitments	2
551.1 - 551.14	General departure and alternative compliance	1	2 Requests	2

Citation 30 CFR 551	Reporting and Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours
		Non-Hour Cost Burden*		
	requests not specifically covered elsewhere in part 551 regulations.			
Subtotal			8 responses	8 hours
Extension for Permit Form & Recordkeeping				
551.14(b) (BOEM-0327)	Request extension of permit time period; enter agreements.	1	100 Extensions	100
	Retain G&G data/information for 10 years and make available to BOEM upon request.	1	130 Recordkeepers	130
Subtotal			230 responses	230 hours
Total Burden			688 Responses	35,254 Hours
			\$136,816 Non-Hour Cost Burden	

*Fees are subject to modification per inflation annually.

** Burden hours for the frontier areas of the Alaska Region and Atlantic OCS are significantly higher because of NEPA and mitigation requirements. BOEM is accounting for the total time to compile/submit the necessary information to obtain the required authorizations to acquire a BOEM permit. There are currently no such activities ongoing in the Pacific OCS Region.

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

The average respondent cost is \$46/hour (rounded). This cost is broken out in the below table using the Bureau of Labor Statistics data for the Houston, TX area*. See BLS website: https://www.bls.gov/oes/current/oes_26420.htm.

Position	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.4** x \$/hour)	Percent of time spent on collection	Weighted Average (\$/hour)
Secretary/Administrative (43-6014)	\$17.42	\$24.39	65%	\$16
Cartographer/Permitting Specialist (17-1021)	\$36.26	\$50.76	10%	\$5
Regulatory Geoscientist (19-2042)	\$73.05	\$102.27	20%	\$20
Staff Level Geoscientist (19-2042)	\$73.05	\$102.27	5%	\$5
Weighted Average (\$/hour)				\$46

* Note that this BLS source reflects their last update from May 2016.

** A multiplier of 1.4 (as implied by BLS news release USDL 17-1646, December 15, 2017 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

Based on a cost factor of \$46 per hour, we estimate the hour burden as a dollar cost equivalent is \$1,621,684 (\$46 x 35,254 hours = \$1,621,684).

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

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

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

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

We have identified one non-hour cost burden for this collection of information. Under § 551.5(a) there is an application fee of \$2,012 when respondents submit a permit application. Refer to the table in Section A.12.

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

The average cost to the Federal Government is \$66/hour (rounded). This cost is broken out in the below table using the Office of Personnel Management pay schedule for the REST OF UNITED STATES (Consisting of the portions of the lower 48 United States not located within another locality pay area).

Position	Grade	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.6* x \$/hour)	Percent of time spent on collection	Weighted Average (\$/hour)
Technician	GS-8/5	\$25	\$40	30%	\$12
Geologist	GS-13/5	\$47	\$75	64%	\$48
Supv. Geophysicist/Geologist	GS-14/5	\$56	\$90	5%	\$5
Regional Geol. Supv. **	GS-15/5	\$77	\$123	1%	\$1
Weighted Average (\$/hour)					\$66

* A multiplier of 1.6 (as implied by BLS news release USDL 17-1646, December 15, 2017 (see

<http://www.bls.gov/news.release/ecec.nr0.htm>) was added for benefits.

** Title 5 Special Rate Tables by Occupation, Occupation series 1350, Special rate table 0722,
<https://apps.opm.gov/SpecialRates/2017/IndexByOccupations.aspx>.

We estimate that to analyze and review the information, BOEM will spend approximately 1,101 hours annually. Based on a cost factor of \$66 per hour, we estimate the total annual burden on the Federal Government is \$72,666 ($\$66 \times 1,101 \text{ hours} = \$72,666$). The annual hours are based on the following:

§ 551.4, 551.5, 551.6	68 applications x 6 hours =	408 hours
§ 551.8	185 reports x 2 hours =	370 hours
§ 551.9	2 responses x 1/2 hour =	1 hours
§§ 551.11, 551.12	40 responses x 1 hours =	40 hours
§ 551.13	40 responses x 2 hours =	80 hours
Miscellaneous Reviews	202 hours =	<u>202</u> hours

1,101 hours

Permittees are reimbursed also for the reasonable cost of processing geophysical information required to be submitted when processing is in a form or manner required by the Director of BOEM and is not used in the normal conduct of the business of the permittee.

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

The currently approved OMB paperwork burden is 40,954 burden hours. Due to a reduction of G&G permits in the Gulf of Mexico, BOEM is reducing the total number of applications, reducing the total annual paperwork burden hours to 35,254 burden hours.

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

BOEM will not tabulate or publish the data.

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

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

18. Explain each exception to the topics of the certification statement identified in, “Certification for Paperwork Reduction Act Submissions”.

To the extent that the topics apply to this collection of information, we are not making any exceptions to the Certification for Paperwork Reduction Act Submissions.