# Supporting Statement A

# Measurement of Gas (43 CFR Subpart 3175)

# OMB Control Number 1004-0210

**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 ICR contain surveys, censuses, or employ statistical methods?" is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

## Specific Instructions

## Justification

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

The Bureau of Land Management (BLM) is requesting renewal of a control number that pertains to the accurate measurement and proper reporting of all natural gas removed or sold from Federal and Indian leases, units, unit participating areas (PAs), and areas subject to communitization agreements (CAs). This information collection (IC) applies to operators primarily, and also to lessees, purchasers, and transporters.

This control number covers IC activities that were adopted in a 2016 rule that updated and replaced Onshore Oil and Gas Order No. 5 with a new regulation codified in the Code of Federal Regulations (CFR) at 43 CFR 3175 (81 FR 81517, November 17, 2016). The 2016 rule establishes minimum standards for accurate measurement and proper reporting of all gas removed or sold from Federal and Indian (except the Osage Tribe) leases, units, unit PAs, and areas subject to CAs. It provides a system for production accountability by operators, lessees, purchasers, and transporters.

The Secretary of the Interior has the authority under the following Federal and Indian mineral leasing laws to manage oil and gas operations on Federal and Indian (except Osage Tribe) lands:

- Allotted Mineral Leasing Act, 25 U.S.C. 396;

- Indian Mineral Leasing Act, 25 U.S.C. 396a et seq.;
- Indian Mineral Development Act, 25 U.S.C. 2101 et seq;
- Mineral Leasing Act, 30 U.S.C. 181 et seq.;
- Mineral Leasing Act for Acquired Lands, 30 U.S.C. 351 et seq.;
- Federal Oil and Gas Royalty Management Act, 30 U.S.C. 1701 et seq.; and
- Federal Land Policy and Management Act, 43 U.S.C. 1701 et seq.

**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.**

Many of the information collection activities are incurred by persons in the normal course of their activities and are "usual and customary" within the meaning of 5 CFR 1320.3(b)(2), since they are commonly found in gas sales contracts and/or industry standards. Therefore they are not among the "burdens" that must be disclosed under the Paperwork Reduction Act. Some other activities are usual and customary only in part. The burdens of those activities are analyzed to the extent they are not usual and customary.

Some of the activities in this rule will result in one-time burdens because they apply only to equipment in operation before January 17, 2019 (i.e., the effective date of the 2016 rule of measurement of gas) and therefore pertain only to the initial implementation of the rule. These one-time burdens are spread over three years for the purposes of our request to OMB, giving an average annualized burden of 1,610 hours for industry, and 2,659 hours for the government. As outlined in IM 2018-077, these one-time burdens have been delayed indefinitely due to unexpected delays in the formation and functioning of the Production Measurement Team (PMT), and unexpected delays in the development of the BLM's Gas Analysis Reporting and Verification System GARVS.

For some other activities, there is both an annual burden for some respondents, and a one-time burden for virtually all respondents in the initial implementation. Finally, some of the information collection activities apply only annually.

Table 2, below, lists all information collection activities. However, only those that are not considered usual and customary business practices are included in the burden estimates of questions 12, 13, and 14.

**Table 2**
**Summary of Information Collection Activities**

| Activity | Usual and Customary | Industry Hour Burden (Table 12-2) | Industry Non-Hour Burden (Table 13) | Government Hour Burden (Table 14-2) |
|---|---|---|---|---|
| Transducers – Test Data Collection and Submission for Existing Makes and Models<br>43 CFR 3174.43 and 3175.130<br>One-Time | | X | | X |
| Transducers – Test Data Collection and Submission for Future Makes and Models<br>43 CFR 3174.43 and 3175.130<br>Annual | | X | X | X |
| Flow-Computer Software – Test Data Collection and Submission for Existing Makes and Models<br>43 CFR 3175.44 and 3175.140 through 3175.144<br>One-Time | | X | | X |
| Flow-Computer Software – Test Data Collection and Submission for Future Makes and Models<br>43 CFR 3175.44 and 3175.140 through 3175.144<br>Annual | | X | X | X |
| Differential Primary Devices Other than Flange-Tapped Orifice Plates – Test Data Collection and Submission for Existing Makes and Models<br>43 CFR 3175.47<br>One-Time | | X | X | X |
| Linear Measurement Devices– Test Data Collection and Submission for Existing Makes and Models<br>43 CFR 3175.48<br>One-Time | | X | | X |

| Activity | Usual and Customary | Industry Hour Burden (Table 12-2) | Industry Non-Hour Burden (Table 13) | Government Hour Burden (Table 14-2) |
|---|---|---|---|---|
| Linear Measurement Devices – Test Data Collection and Submission for Future Makes and Models<br>43 CFR 3175.48<br>Annual | | X | X | X |
| Accounting Systems − Test Data Collection and Submission for Existing Makes and Models<br>43 CFR 3175.49<br>One-Time | | X | | |
| Accounting Systems − Test Data Collection and Submission for Future Makes and Models<br>43 CFR 3175.49<br>One-Time | | X | | |
| Orifice Plate Inspection<br>43 CFR 3175.80(d) and (e)<br>Annual | X | | | |
| Basic Inspection of Meter Tubes − Data Collection and Submission<br>43 CFR 3175.80(h)(5)<br>Annual | | X | X | |
| Schedule of Basic Meter Tube Inspection<br>43 CFR 3175.80(h)(3)<br>Annual | | X | | |
| Detailed Inspection of Meter Tubes – Data Collection and Submission<br>43 CFR 3175.80(i) and (j)<br>Annual | | X | X | |
| Request for Extension of Time for a Detailed Meter Tube Inspection<br>43 CFR 3175.80(i)<br>Annual | | X | | |

| Activity | Usual and Customary | Industry Hour Burden (Table 12-2) | Industry Non-Hour Burden (Table 13) | Government Hour Burden (Table 14-2) |
|---|---|---|---|---|
| Maintenance of Data at a Facility Measurement Point (FMP)<br>43 CFR 3175.91(d) and 3175.101(c)<br>Annual | | | X | |
| Verification and Calibration of Mechanical Recorders<br>43 CFR 3175.92(d) and 3175.102(f)<br>Annual | X | | | |
| Redundancy Verification Check for Electronic Gas Measurement Systems<br>43 CFR 3175.102(e)(2)<br>Annual | | X | | |
| Notification of Verification<br>43 CFR 3175.92(e) and 3175.102(f)<br>Annual | | X | | |
| Test Equipment Certification<br>43 CFR 3175.92(g) and 3175.102(h)<br>Annual | X | | | |
| Sample Cylinder Cleaning − Documentation<br>43 CFR 3175.113(c)(3)<br>Annual | | X | X | |
| Sample Separator Cleaning − Documentation<br>43 CFR 3175.113(d)(1)<br>Annual | | X | X | |
| Evacuation and Pre-charge for the Helium Pop Method − Documentation<br>43 CFR 3175.114(a)(2)<br>Annual | | X | | |

| Activity | Usual and Customary | Industry Hour Burden (Table 12-2) | Industry Non-Hour Burden (Table 13) | Government Hour Burden (Table 14-2) |
|---|---|---|---|---|
| O-ring and Lubricant Composition for the Floating Piston Method – Documentation<br>43 CFR 3175.114(a)(3)<br>Annual | | X | | |
| Schedule for Spot Sampling<br>43 CFR 3175.113(b)<br>Annul | | X | | |
| Submission of On-line Gas Chromatograph Specifications<br>43 CFR 3175.117(c)<br>Annual | | X | | |
| Gas Chromatograph Verification – Documentation<br>43 CFR 3175.118(c) and (d)<br>Annual | | X | X | |
| Integration Statements<br>43 CFR 3175.93<br>Annual | X | | | |
| Quantity Transaction Record – Data Collection and Submission<br>43 CFR 3175.104(a)<br>Annual | P* | X | | |
| Quantity Transaction Record Edits<br>43 CFR 3175.126(c)<br>Annual | X | | | |
| Configuration Log<br>43 CFR 3175.104(b)<br>Annual | P* | X | | |
| Event Log<br>43 CFR 3175.104(c) | X | | | |
| Alarm Log<br>43 CFR 3175.104(d) | X | | | |
| Amended Reports Due to Calibration<br>43 CFR 3175.92(f) and 3175.102(g) | X | | | |

| Activity | Usual and Customary | Industry Hour Burden (Table 12-2) | Industry Non-Hour Burden (Table 13) | Government Hour Burden (Table 14-2) |
|---|---|---|---|---|
| Gas Analysis Reports – Entry of Data into the Gas Analysis Reporting and Verification System<br>43 CFR 3175.120(f)<br>Annual | P* | X | X | |
| Gas Analysis – Spot Sampling<br>43 CFR 3175.115(a) and (b) | P* | | X | |
| Gas Analysis – Composite Sampling<br>43 CFR 3175.115(b)(5)<br>One-Time | P* | | X | |
| Gas Analysis – Extended Gas Analysis<br>43 CFR 3175.119 | | | X | |

*P means that there are aspects to the requirement that exceed what is considered usual and customary. The burdens associated with this activity only include those aspects that exceed what is usual and customary

Some of the information collection burdens listed in Tables 12-2, 13, or 14-2 do not include the costs of maintaining data and submitting it to the BLM. Data retention, and submission of data at the request of the BLM, are required at 43 CFR 3170.7, which is within the BLM's site security regulations and control number 1004-0207. In general, § 3170.7 requires maintenance and retention of records for 7 years for Federal leases and for 6 years for Indian leases. Additional details are at 43 CFR 3170.7(c) through (e). The estimated PRA burdens for these activities are disclosed in the site-security rule and control number 1004-0207 under the heading, "Required Recordkeeping and Records Submission (43 CFR 3170.7)."

Where data retention and/or submission are required by 43 CFR 3170.7, the titles of the information collection activities do not include the word "maintenance" and/or "submission." Where these types of requirements are included in the 2016 rule on gas measurement, the titles of the information collection activities include the word "maintenance" and/or "submission."

In this supporting statement, the information collection activities in this control number are organized into the following categories:

A. Testing of Makes and Models of Gas-Measurement Equipment;
B. Inspections and Verifications;
C. Gas Sampling and Analysis; and
D. Determining and Reporting Volumes, Heating Value, and Relative Density.

## A. Testing of Makes and Models of Gas-Measurement Equipment

Certain regulations within 43 CFR subpart 3175 provide for the listing of approved makes and models of gas-measurement equipment or software at www.blm.gov. These provisions also provide for procedures to seek approval of other makes and models. For any makes and models that have not yet been approved, the operator or manufacturer arranges for testing of the equipment or software by a qualified testing facility. The testing is accomplished by comparing the requested equipment or software with reference standards specified in the regulations.

The operator or manufacturer submits a report to the BLM's PMT. The PMT, which consists of BLM employees who are experts in oil and gas measurement, will act as a central advisory body for reviewing devices and software not specifically addressed and approved in these regulations. The report must show the results of the testing, as well as descriptions of the test set-up and procedures, qualifications of the test facility, and uncertainty analyses.

The PMT will review the report, and then recommend to the BLM Director that use of the device or software be approved, disapproved, or approved with conditions. If the BLM Director decides to approve the device with or without conditions, the device will be posted on the BLM website as being available for use by any operator without any further review or approval. These information collection activities will assist the BLM in ensuring that the equipment and software used in gas measurement are in compliance with the performance standards in § 3175.31 of the rule.

None of the activities listed in this section are considered usual and customary; therefore, the full burden of each of these are included in questions 12, 13, and 14. We anticipate one-time, start-up requests during the first three years after the effective date of the rule as well as a limited number of recurring requests each year after that. We calculated cumulative burden estimates for these activities for the first three years after the effective date of the rule. We annualized these burden estimates for inclusion in the total estimated hour burdens of this rule. The start-up requests are indicated in the burden tables with the caption "ONE-TIME." The recurring requests, after the first three years are indicated in the burden tables with the caption "ANNUAL."

1. ***Transducers – Test Data Collection and Submission for Existing Makes and Models (43 CFR 3175.43 and 3175.130); and***
2. ***Transducers – Test Data Collection and Submission for Future Makes and Models (43 CFR 3175.43 and 3175.130)***

These information collection activities pertain to electronic gas measurement (EGM) systems. As defined at 43 CFR 3175.10, an EGM system includes all hardware and software necessary to convert the static pressure, differential pressure, and flowing temperature developed as part of a primary device, to a quantity, rate, or quality measurement that is used to determine Federal or Indian royalty.

For transducers that were developed and used at facility measurement points (FMPs) before January 17, 2017, 43 CFR 3175.43(b) allows the manufacturer or operator to submit existing test data for that make and model of transducer in lieu of testing the transducers under 43 CFR 3175.130. Presumably, manufacturers already have the pertinent data because they were used to develop the transducer's published performance specifications. The BLM believes that virtually all manufacturers of existing makes and models of transducers choose this option to avoid the cost and time of testing their transducers under 43 CFR 3175.130. Because this option does not require new testing, there are no non-hour cost burdens (Table 13) related to this activity. The hourly burden costs (Table 12-2) account for the time required to find and compile the existing test data.

Once it is up and running, the PMT will review the data and develop performance specifications for that transducer make and model to the best of its ability. If the testing is insufficient to support the manufacturer's published performance specifications, the PMT may recommend to the BLM Director that the approval of the transducer be limited to specific operating conditions.

For makes and models of transducers developed and used at FMPs after January 17, 2017, the effective date of the rule, the BLM Director will approve use of that make and model of transducer only on the basis that the transducer has been tested under the requirements listed at 43 CFR 3175.131 through 3175.133. See 43 CFR 3175.130. The information collection activity in this set of regulations is at 43 CFR 3175.134, which requires submission of a report showing the results of each test required by § 3175.131 through 3175.133. All tests must be fully documented by the test facility performing the tests. It also provides that the report must indicate the results for each required test and include all data points recorded. The testing of the transducer is a non-hour cost burden (Table 13). The cost of preparing and submitting the test report, which is disclosed in Table 12-2, is a one-time burden for equipment existing before the effective date of the 2016 rule, and is an annual burden for equipment that goes into operation after the effective date of the 2016 rule.

The test report must be submitted to the PMT. If the PMT determines that all testing was completed as required by § 3175.131 through 3175.133, it will make a recommendation that the BLM Director approve the transducer and post the transducer make, model, and range, along with the reference uncertainty (see 43 CFR 3175.135), influence effects, and any operating restrictions to the BLM's website (www.blm.gov) as an approved device.

Transducers used at low- and very-low-volume FMPs are exempt from these requirements.

***3. Flow-Computer Software – Test Data Collection and Submission for Existing Makes and Models (43 CFR 3175.44 and 3175.140 through 3175.144); and***

***4. Flow-Computer Software – Test Data Collection and Submission for Future Makes and Models (43 CFR 3175.44 and 3175.140 through 3175.144)***

The BLM Director will approve a particular version of flow-computer software for use in a specific make and model of flow computer only if the testing performed on the software meets all of the standards and requirements in 43 CFR 3175.141 through 3175.144. Type-testing is

required for each software version that affects the calculation of flow rate, volume, heating value, live input variable averaging, flow time, or the integral value. Software updates or changes that do not affect these items do not require BLM approval 43 CFR 3175.140. However, the manufacturer must still provide some documentation to the BLM (see paragraph (ii)).

The information collection activity in this set of regulations is at 43 CFR 3175.144, which requires submission of a report showing the results of each test required by § 3175.141 through 3175.143, including all data points recorded. The testing must be performed by a qualified testing facility not affiliated with the manufacturer.

This report will be reviewed by the PMT who will recommend approval, approval with conditions, or denial to the BLM Director. The BLM Director's approval, with or without conditions, will be a pre-requisite for BLM posting of approved software for use in an EGM system at the BLM's website (www.blm.gov). This requirement assists the BLM in ensuring that software used in gas measurement is in compliance with performance standards. The cost of the testing is considered a non-hour burden and is included in Table 13. The cost of preparing and submitting the test report is considered an hour burden and is included in Table 12-2.

For flow computer software that does not affect the calculation of flow rate, volume, heating value, live input variable averaging, flow time, or the integral value, the operator or manufacturer must provide the PMT with a list of these software versions along with a brief description of what changes were made from the previous version. The PMT will also post these software versions as approved software on the BLM website (www.blm.gov). No testing or approval is required. The cost of the testing is considered a non-hour burden and is included in Table 13. The cost of preparing and submitting the test report, which is disclosed in Table 12-2, is a one-time burden for software in use before the effective date of the 2016 rule, and is an annual burden for software that will be in use only after the effective date of the 2016 rule.

### *5. Isolating Flow Conditioners – Test Data Collection and Submission for Existing Makes and Models (43 CFR 3175.46)*

Section 3175.46 provides for the listing of an approved make and model of isolating flow conditioner at www.blm.gov, and provides procedures for operators or manufacturers to seek that approval. The procedure involves testing by a qualified testing facility not affiliated with the manufacturer. The reference standards for the testing are included in the American Petroleum Institute's (API's) Manual of Petroleum Measurement Standards. The API standards for flow conditioners are among those that are incorporated by reference in these regulations. The operator or manufacturer reports the test data to the PMT, which reviews the test data to ensure that the requested flow conditioner meets the relevant requirements, and recommends that the BLM approve use of the device, disapprove use of the device, or approve its use with conditions. If the BLM Director approves the device, the BLM will add the approved make and model, and any applicable conditions of use, to the list maintained at www.blm.gov. The cost of the testing is a non-hour burden and is included in Table 13. The cost of preparing the test report, which is disclosed in Table 12-2, is a one-time hourly burden because it applies only to equipment in existence before the effective date of the 2016 rule.

***6. Differential Primary Devices Other than Flange-Tapped Orifice Plates – Test Data Collection and Submission for Existing Makes and Models (43 CFR 3175.47)***

Section 3175.47 provides for the listing of an approved make and model of differential primary device at www.blm.gov, and provides a procedure for operators or manufacturers to seek approval of other makes and models. The procedures involve testing by a qualified testing facility not affiliated with the manufacturer. The reference standards for the testing are included in the American Petroleum Institute's (API's) Manual of Petroleum Measurement Standards, although the PMT may require additional testing. The API standards for differential primary devices are among those that are incorporated by reference in these regulations.

Next, the operator or manufacturer reports the test data to the PMT, which will review the test data to ensure that the device meets the relevant requirements, and will recommend that the BLM Director approve use of the device, disapprove use of the device, or approve its use with conditions. If the BLM Director approves the device, the BLM will add the approved make and model, and any applicable conditions of use, to the list maintained at www.blm.gov. The cost of the testing is a non-hour burden and is included in Table 13. The cost of preparing the test report, which is disclosed in Table 12-2, is a one-time hourly burden because it applies only to equipment in existence before the effective date of the 2016 rule.

***7. Linear Measurement Devices – Test Data Collection and Submission for Existing Makes and Models (43 CFR 3175.48); and***

***8. Linear Measurement Devices – Test Data Collection and Submission for Future Makes and Models (43 CFR 3175.48)***

Section 3175.48 provides for the listing of an approved make and model of linear measurement device at www.blm.gov, and provides a procedure for seeking approval of other makes and models. The first step is to arrange for testing by a qualified test facility not affiliated with the linear measurement device manufacturer.

Next, the operator or manufacturer reports the test data to the PMT, which will review the test data to ensure that the device meets the relevant requirements, and will recommend that the BLM Director approve use of the device, disapprove use of the device, or approve its use with conditions. If the BLM Director approves the device, the BLM will add the approved make and model, and any applicable conditions of use, to the list maintained at www.blm.gov. The cost of the testing is a non-hour burden and is included in Table 13. The cost of preparing and submitting the test report, which is disclosed in Table 12-2, is a one-time burden for equipment existing before the effective date of the 2016 rule, and is an annual burden for equipment that goes into operation after the effective date of the 2016 rule.

***9. Accounting Systems – Test Data Collection and Submission for Existing Makes and Models (43 CFR 3175.49); and***

***10. Accounting Systems – Test Data Collection and Submission for Future Makes and Models (43 CFR 3175.49)***

The BLM Director will approve the use of a particular name and version of accounting system for use in conjunction with FMPs if the accounting system meets the standards of 3175.49. The information collection activity for quantity transaction records is at 43 CFR 3175.49(a) and (b); for configuration logs it is at 43 CFR 3175.49(c), for event logs it is at 43 CFR 3175.49(d), and for alarm logs, it is at 43 CFR 3175.49(e). The BLM may also request additional records under 43 CFR 3175.49(f). The PMT will compare the records generated by the flow computer with the records generated by the accounting system. If the comparison is successful, the PMT will recommend that the BLM Director approve the use of the accounting system. If the accounting system is approved, it will be listed at www.blm.gov. The costs associated with this information collection activity only involve the compilation of data from flow computers and the accounting system, all of which the BLM considers to be hourly burden costs (Table 12-2). There are no non-hour burden costs. The cost of preparing and submitting the test report, which is disclosed in Table 12-2, is a one-time burden for systems in use before the effective date of the 2016 rule, and is an annual burden for systems that will be in use only after the effective date of the 2016 rule.

## B. Inspections and Verifications

The following information collection activities are necessary in order to ensure that the equipment used to measure gas is in good working condition. Some of these information collection activities are usual and customary because they are required by gas sales contracts and/or industry standards. To the extent they are usual and customary, they are not "burdens" under the Paperwork Reduction Act (see 5 CFR 1320.3(b)(2)). A description of what is considered usual and customary is given for each applicable activity.

The regulations pertaining to inspections and verifications refer to primary, secondary, and tertiary devices which measure the volume of natural gas on which royalty is due. While not all types of gas meters include tertiary devices, all differential types of gas meters consist of at least a primary device and a secondary device. The primary device is the equipment that creates a measureable and predictable pressure drop in response to the flow rate of fluid through the pipeline. A flange-tapped orifice plate is the most common primary device. The secondary device measures the differential pressure along with static pressure and temperature. In the case of an EGM system, there is also a tertiary device, which calculates volume and flow rate based on data received from the transducers and other data programmed into the flow computer.

The regulations also pertain to the inspections and verifications that determine the heating value and relative density of the gas. The heating value of the gas is used directly in the determination of royalty due while the relative density is used in the determination of volume. The inspection items for heating value and relative density include documentation to ensure that sampling equipment is clean, calibrated, and properly used, and that samples are taken at the required frequency.

### *1. Inspection of Meter Tubes (43 CFR 3175.80(h) through (j))*

Section 3175.80 requires basic inspections of meter tubes and, depending on the results of the basic inspection, it may require detailed inspections of meter tubes. It also requires operators to maintain records of both types of inspections, and to provide those records to the BLM upon request. Although meter tube inspections may be part of some gas sales contracts, for the purpose of this analysis the BLM assumes that no aspect of inspection of meter tubes is usual and customary because inspection of meter tubes was not a requirement of Onshore Order 5. Section 3175.80(h)(5) requires operators to maintain documentation of the findings from basic meter tube inspections, including:

- The information required in 43 CFR 3170.7(g)
- The time and date of inspection
- The type of equipment used to make the inspection; and
- A description of findings, including location and severity of pitting, obstructions, and buildup of foreign substances.

The purpose of a basic meter tube inspection is to identify pitting, obstructions, or the buildup of foreign substances in the meter tube, all which can affect the accuracy of the meter.

If the basic inspection reveals pitting, obstructions, or a buildup of foreign material on a high- or very-high-volume FMP, the operator must perform a detailed inspection of that meter tube within 30 days. For low-volume FMPs, the operator only needs to clean the meter tube.

### *a. Schedule of Basic Meter Tube Inspection (43 CFR 3175.80(h)(3)*

An operator either must:

- Notify the BLM at least 72 hours in advance of performing a basic inspection of meter tubes; or
- Submit a monthly or quarterly schedule of basic inspections to the BLM in advance.

There is no set format for a monthly or quarterly schedule of basic meter tube inspections. All costs associated with preparation of the schedule are considered to be hourly burdens and are listed in Table 12-2 as such. There are no non-hour burdens associated with this information collection activity.

### *b. Basic Inspection of Meter Tubes – Data Collection and Submission (43 CFR 3175.80(h)(5))*

For any operator that chooses not to submit a monthly or quarterly schedule of basic meter tube inspections under § 3175.80(h)(3), Table 1 at 43 CFR 3175.80 establishes the following required inspection frequencies:

- Once a year for very-high-volume FMPs;
- Once every other year for high-volume FMPs; and
- Once every 5 years for low-volume FMPs.

Very-low-volume FMPs are exempt from meter tube inspections.

### *c. Detailed Inspection of Meter Tubes – Data Collection and Submission (43 CFR 3175.80(i) and (j))*

If a basic meter tube inspection reveals pitting, obstructions, or a buildup of foreign material on a high- or very-high-volume FMP, the operator must perform a detailed inspection of that meter tube within 30 days. A detailed inspection is also required when a meter tube is first installed at a high- or very-high-volume FMP, although an operator can submit documentation showing that the meter tube complies with provisions of API's Manual of Petroleum Measurement Standards that are listed at 43 CFR 3175.80, in lieu of performing a detailed inspection.

The operator must retain documentation of all detailed meter tube inspections, demonstrating that the meter tube complies with API 14.3.2, Subsections 5.1 through 5.4 (all incorporated by reference, see 43 CFR 3175.30), and showing all required measurements. The operator must provide such documentation to the BLM upon request for every meter-tube inspection. Documentation must also include the information required in 43 CFR 3170.7(g).

The recordkeeping requirements for a detailed inspection include the information required in 43 CFR 3170.7(g) along with all measurements and findings that demonstrate the meter tube complies with API standards. Section 3170.7(g) requires that all records, including source records that are used to determine quality, quantity, disposition and verification of production attributable to a Federal or Indian lease, unit PA, or CA, must include a unique meter identification number and the name of the company that created the record.

### *d. Request for Extension of Time for a Detailed Meter Tube Inspection (43 CFR 3175.80(i))*

There is no set format or requirements for a request for an extension of time to perform a detailed inspection. The operator must submit a request to the BLM for an extension of the 30-day timeframe, justifying the need for the extension

## *2. Maintenance of Data at an FMP (43 CFR 3175.91(d) and 3175.101(c))*

Sections 3175.91(d) and 3175.101(c) require that certain data be maintained at FMPs for mechanical recorders and EGM systems, respectively. The purpose of maintaining these data is to allow BLM inspectors to verify the monthly reported volumes of gas reported on the Oil and Gas Operator Reports and, for EGM systems, to verify the configuration of and calculations of flow computers.

For mechanical recorders, these data include:

- Differential-bellows range;
- Static-pressure-element range;
- Temperature-element range;
- Static-pressure units of measure (psia or psig);
- Relative density (specific gravity);
- Meter elevation;
- Meter-tube inside diameter;
- Primary device type;
- Orifice-bore or other primary-device dimensions necessary for device verification, Beta- or area-ratio determination, and gas-volume calculation;
- Make, model, and location of approved isolating flow conditioners, if used;
- Location of the downstream end of 19-tube-bundle flow straighteners, if used;
- Date of last primary-device inspection; and
- Date of last verification.

For EGM systems:

- The unique meter ID number;
- Relative density (specific gravity);
- Elevation of the FMP;
- Primary device information such as orifice bore diameter (inches) or Beta or area ratio and discharge coefficient, as applicable;
- Meter-tube mean inside diameter;
- Make, model, and location of approved isolating flow conditioners, if used;
- Location of the downstream end of 19-tube-bundle flow straighteners, if used;
- For self-contained EGM systems, make and model number of the system;
- For component-type EGM systems, make and model number of each transducer and the flow computer;
- URL and upper calibrated limit for each transducer;
- Location of the static pressure tap (upstream or downstream);
- Last primary-device inspection date; and
- Last secondary device verification date.

Although some of this information is required by the statewide Notices to Lessees (NTLs) for EGM systems, the BLM does not believe this requirement is usual and customary. Because the posting and maintenance of these data would typically be done as a field activity in conjunction with meter calibration and maintenance, rather than a reporting activity done by office personnel, the BLM included these as non-hourly burden costs in Table 13. There are no hourly burden costs associated with this activity. Therefore, this activity is not listed in Table 12-2.

### *3. Redundancy Verification Check for Electronic Gas Measurement Systems (43 CFR 3175.102(e)(2))*

Section 3175.102(e)(2) allows redundancy verification in lieu of routine verification. If an operator opts to use redundancy verification, the 2016 rule establishes standards for the information that must be retained and submitted to the BLM on request, usually during production audits. The use of redundancy verification is not currently a common practice in the United States, and the BLM anticipates that it will only be used on 10 percent of FMPs classified as very-high volume. Because redundancy verification primarily consists of comparing the readings from two sets of transducers and documenting that comparison, there are no non-hour cost burdens associated with this activity. Table 12-2 shows the projected hourly burden of collecting the information.

The following information is required:

- The information required at 43 CFR 3170.7(g) (a regulation that is part of the rulemaking for site security, RIN 1004-AE15, control no. 1004-0207);
- The month and year for which the redundancy check applies;
- The makes, models, upper range limits, and upper calibrated limits of the primary set of transducers;
- The makes, models, upper range limits, and upper calibrated limits of the check set of transducers;
- The information required in provisions of API's Manual of Petroleum Measurement Standards that are listed in the regulation, which includes comparisons of volume, energy, differential pressure, static pressure, and temperature both in tabular form (average values) and graphical form (instantaneous values).
- The tolerance for differential pressure, static pressure, and temperature as calculated under 43 CFR 3175.102(d)(2); and
- Whether or not each transducer required verification under paragraph (c) of this section.

### *4. Notification of Verification (43 CFR 3175.92(e) and 3175.102(f))*

Section 3175.92(e) requires that, for verifications performed after installation or following repair, operators give the BLM notice of verifications at least 72 hours before conducting the verifications. For routine verifications, the operator either must provide the BLM with notice of verifications at least 72 hours prior to verification, or provide the BLM with a monthly or quarterly schedule of verifications. The BLM uses this information to schedule the witnessing of verifications. The BLM does not believe that providing 72-hour notice of verifications, normally by phone or email, results in any significant cost burden. However, the preparation of a monthly or quarterly schedule does involve some hourly cost burdens, which are included in Table 12-2. There are no non-hour cost burdens associated with this activity.

### *5. Sample Cylinder Cleaning – Documentation (43 CFR 3175.113(c)(3))*

Section 3175.113(c)(3) requires operators to clean sample cylinders used to collect gas samples in accordance with Gas Processor's Association (GPA) standards. This section also requires the operator to maintain documentation of the cleaning and submit it to the BLM on request. The BLM uses this information during an audit or during the witnessing of a gas sample being taken

in order to ensure that the sample cylinder is clean and free of contaminates that could alter the composition of the sampled gas and, in turn, affect royalty. The rule does not specify a format or minimal informational requirements for the documentation.

The BLM does not believe that cleaning sample cylinders and providing documentation of the cleaning is a usual and customary business practice. Therefore, the non-hour burden cost of cleaning a sample cylinder is included in Table 13 and the hourly cost burden of preparing the documentation is included in Table 12-2.

### *6. Sample Separator Cleaning – Documentation (43 CFR 3175.113(d)(1))*

Section 3175.113(d)(1) requires that sampling separators, if used, must be cleaned in accordance with GPA standards. Sample separators are sometimes used with portable GCs to ensure that liquids do not get into and damage the GC. The cleaning process for sample separators is identical to the cleaning process for sample cylinders. This section also requires the operator to maintain documentation of the cleaning and submit it to the BLM on request. The BLM uses this information during an audit or during the witnessing of a gas sample being taken in order to ensure that the sample separator is clean and free of contaminates that could alter the composition of the sampled gas and, in turn, affect royalty. The rule does not specify a format or minimal informational requirements for the documentation.

The BLM does not believe that cleaning sample separators and providing documentation of the cleaning is a customary or usual business practice. Therefore, the non-hour burden cost of cleaning a sample separator is included in Table 13 and the hourly cost burden of preparing the documentation is included in Table 12-2.

### *7. Documentation Related to the "Helium Pop" Sampling Method (3174.114(a)(2))*

The "helium pop" method employs a sample cylinder that is evacuated and then pre-charged with helium. This process is done at a central facility where the BLM would not normally have access. If the cylinder is not evacuated and pre-charged with helium, the resulting gas sample may not represent the gas flowing through the meter, which could affect royalty. By requiring operators to provide documentation of the evacuation and pre-charge process, the BLM has some assurance that the sample will be properly taken.

The BLM believes that the evacuation and helium pre-charge is a usual and customary business practice for operators employing this sampling method. However, the BLM does not believe that documenting this process and having that documentation on-site during gas sampling is a usual and customary business. Therefore, Table 12-2 includes the hourly cost burden of the documentation of this process. Because the non-hour cost burden is a usual and customary process, there is no non-hour cost burden in Table 13.

### *8. O-ring and Lubricant Composition for the Floating Piston Method – Documentation (43 CFR 3175.114(a)(3))*

The "floating piston" method employs a piston inside the sampling cylinder that allows the operator to maintain a constant pressure when collecting a sample. To work properly, the piston must form an air-tight seal against the inside walls of the cylinder. This is accomplished using O-rings and lubricants. If the O-rings or lubricants are composed of certain materials, they could contaminate the sample which, in turn, could affect royalty. The only way the BLM can ensure that the O-rings or lubricants will not contaminate the gas sample is to have documentation of what the O-rings and lubricants consist of at the time the BLM is witnessing a sample being taken using a floating piston.

The BLM believes that the using proper O-rings and lubricants is a usual and customary business practice for operators employing this sampling method. However, the BLM does not believe that documenting the composition of the O-rings and lubricants and having that documentation on-site during gas sampling is a usual and customary business practice. Therefore, Table 12-2 includes the hourly cost burden of the documentation of this process. Because the non-hour cost burden is a usual and customary process, there is no non-hour cost burden in Table 13.

### *9. On-line Gas Chromatograph Specifications (43 CFR 3175.117(c))*

If the operator uses an on-line gas chromatograph, § 3175.117(c) requires operators to submit the manufacturer's specifications and installation and operational recommendations to the BLM on request. The BLM requests this data to ensure that the on-line gas chromatograph is properly installed and operated in the field. Unlike other measurement-related devices, the design and operation of on-line gas chromatographs could vary significantly from manufacturer to manufacturer or even from model to model. The cost of retrieving operational manuals for these devices would incur a minimal hourly cost burden, which is included in Table 12-2. There are no non-hour cost burdens associated with this requirement.

### *10. Gas Chromatograph Verification (43 CFR 3175.118(c) and (d))*

Gas chromatographs are used for analyzing samples of natural gas to determine the heating value and relative density of the gas, as discussed below. In order to ensure that a gas chromatograph is accurately determining the composition of gases sampled at FMPs, the chromatograph must periodically be verified. The verification process involves running a gas of a known composition through the chromatograph and comparing the composition determined by the chromatograph with the known composition. If the difference in these compositions is outside the allowable tolerance of these devices, the chromatograph is calibrated and then re-verified to make sure it is accurate.

The BLM requires documentation on the gas chromatograph verification to ensure, either while witnessing a gas analysis or during a production audit, that the chromatograph is accurately analyzing the composition of the gas at FMPs, which is used directly in the determination of royalty.

Gas chromatographs are subject to standards listed at 43 CFR 3175.113(d) (portable gas chromatographs), 3175.117 (on-line gas chromatographs), and 3175.118 (all gas

chromatographs). These sections all require that gas chromatographs be installed, operated, and calibrated in accordance with standards of the Gas Processors Association that are specified in the respective regulations. Those standards are incorporated by reference at § 3175.30. The regulations also require compliance with the verification and calibration requirements of 43 CFR 3175.118. Upon request, the operator must submit to the BLM the results of all verifications.

Section 3175.118(d) requires retention of verification records for the periods specified at 43 CFR 3170.7(c) through (e).

Section 3175.118(d) lists the records that must be retained:

- The components analyzed;
- The response factor for each component;
- The peak area for each component;
- The mole percent of each component as determined by the gas chromatograph;
- The mole percent of each component in the gas used for verification;
- The difference between the mole percents described above, expressed in relative percent;
- Evidence that the gas used for verification and calibration meets the requirements under paragraph 3175.118(c)(2), was authenticated under 3175.118(c)(3), and was maintained under 3175.118(c)(4);
- The chromatograms generated during the verification process;
- The time and date the verification was performed; and
- The name and affiliation of the person performing the verification.

Although the BLM believes that the verification of gas chromatographs is common industry practice, the BLM does not know what the usual and customary verification frequency is, or if it is usual and customary to document and retain verification records. For that reason, and because gas chromatograph verification was not required in Onshore Order 5, the BLM has included the cost of the verifications required under 3175.118(c) as a non-hour burden in Table 13. The cost of documenting the verification required under 3175.118(d) is included as an hourly cost burden in Table 12-2.

## C. Gas Sampling and Analysis

### *1. Schedule for Spot Sampling (43 CFR 3175.113(b))*

Section 3175.113(b) requires operators either to provide the BLM with notice of sampling at least 72 hours prior to sampling, or provide the BLM with a monthly or quarterly schedule of sampling. The BLM uses this information to schedule the witnessing of sampling. The BLM does not believe that providing 72-hour notice of sampling, normally by phone or email, results in any significant cost burden. However, the preparation of a monthly or quarterly schedule would involve some hourly cost burdens, which are included in Table 12-2. There are no non-hour cost burdens associated with this activity.

### *2. Sampling Separator Cleaning – Documentation (43 CFR 3175.113(d)(1)*

Sampling separators, if used, must be operated and cleaned in accordance with standards in the regulations. The applicable standards are listed at 43 CFR 3175.113(d)(1). The operator must maintain documentation of cleaning, and have the documentation available on-site during sampling, and provide it to the BLM upon request.

### *3. Gas Analysis – Spot Sampling (43 CFR 3175.115(a) and (b))*

With some exceptions, spot samples for all FMPs must be taken and analyzed at the following frequency:

- Once every 12 months for very-low volume FMPs;
- Once every 6 months for low-volume FMPS;
- Once every 3 months for high-volume FMPs;
- Once a month for very-high volume FMPs.

These required frequencies are at Table 1 to 43 CFR 3175.110. The BLM may change the required sampling frequency for high-volume and very-high-volume FMPs if the BLM determines that the sampling frequency required in Table 1 in § 3175.110 is not sufficient to achieve the heating value uncertainty levels required in the 2016 rule.

For high-volume FMPs, the BLM may change the sampling frequency no sooner than two years after the FMP begins measuring gas or January 17, 2021 (i.e., four years after the effective date of the 2016 rule), whichever is later. For very-high-volume FMPs, the BLM may change the sampling frequency or require compliance with paragraph (b)(5) of this section no sooner than 1 year after the FMP begins measuring gas or January 17, 2020 (i.e., three years after the effective date of the regulation), whichever is later.

The information collected in spot sampling will constitute a portion of gas analysis reports that operators will be required to submit via GARVS under § 3175.120. Because GARVS is not yet available to operators, this ICR includes only the estimated burdens of the act of sampling itself.

### *4. Gas Analysis – Composite Sampling (43 CFR 3175.115(b)(5)*

For very-high-volume FMPs, the BLM may require the installation of a composite sampling system or on-line GC if the heating value uncertainty levels in § 3175.31(b) cannot be achieved through spot sampling. The information collected in composite sampling will constitute a portion of gas analysis reports that operators will be required to submit via GARVS under § 3175.120. Because GARVS is not yet available to operators, this ICR includes only the estimated burdens of the act of sampling itself.

### *3. Gas Analysis – Extended Gas Analysis (43 CFR 3175.119)*

In addition to the annual composite sampling costs described above, operators of high- and very-high-volume FMPs must submit an extended gas analysis report under 43 CFR 3175.119(b) if

the concentration of their C6+ analysis exceeds 0.5 mole percent. Operators also have the option under 43 CFR 3175.119(c) of periodically testing for these components at a minimum of once per year for high-volume FMPs and once every 6 months for very-high-volume FMPs, and adjusting the assumed C6+ composition to remove any heating value bias.

The information collected in extended gas analyses constitutes a portion of gas analysis reports that operators will be required to submit via GARVS under § 3175.120. Because GARVS is not yet available to operators, this ICR includes only the estimated burdens of the act of sampling itself.

### *4. Gas Analysis Report – Entry into Gas Analysis Reporting and Verification System (43 CFR 3175.120(f))*

Section 3175.120(f) requires that information about gas samples, in the form of a gas analysis report, be entered into GARVS. Section 3175.120(f) also authorizes operators to request a variance from this requirement, provided that the operator is a small business, as defined by the U.S. Small Business Administration, and does not have access to the Internet.

GARVS is not yet available to oil and gas operators. The BLM estimates that GARVS may be available for use by operators in January 2021. At present, the BLM under IM 2018-077 (https://www.blm.gov/policy/im-2018-077-0) is not enforcing the requirement at § 3175.120(f) to enter data into GARVS.

## D. Determining and Reporting Volumes, Heating Value, and Relative Density

Information collection activities under these sections include those activities that are used to report the volume and heating value of the gas on the Oil and Gas Operations Report and that are used to verify those volumes, typically during a production audit.

### *1. Quantity Transaction Record (43 CFR 3175.104(a))*

As defined at 43 CFR 3175.10(a), a "Quantity Transaction Record (QTR)" is "a report generated by EGM equipment that summarizes the daily and hourly volume calculated by the flow computer and the average or totals of the dynamic data that is used in the calculation of volume." Section 3175.104(a) requires operators to retain the original, unaltered, unprocessed, and unedited daily and hourly QTRs. The generation and retention of this information is required by virtually all gas sales contracts involving orifice plates and EGMs. It is also required by industry standards and by the statewide NTLs for Electronic Flow Computers. The QTR must contain the information identified in provisions of API's Manual of Petroleum Measurement Standards that are listed in the regulation, with the following additions and clarifications:

- The information required at 43 CFR 3170.7(g) (a regulation that is part of the rulemaking for site security, RIN 1004-AE15, control no. 1004-0207);

- The volume, flow time, integral value or average extension must be reported to at least 5 decimal places and the average differential pressure, static pressure, and temperature as calculated in § 3175.103(c), must be reported to at least 3 decimal places; and
- A statement of whether the operator has submitted the integral value or average extension.

The burdens in Table 12-2 include the burden to operators to provide the additional information listed above. There are no non-hour cost burdens associated with this information collection activity.

***2. Configuration Log (43 CFR 3175.104(b))***

Section 3175.104(b) requires operators to retain, and submit to the BLM upon request, usually during production audits, the original, unaltered, unprocessed, and unedited configuration log. These requirements are specific to EGMs.

As defined at 43 CFR 3175.10(a), a configuration log is "a list of all fixed or user-programmable parameters used by the flow computer that could affect the calculation or verification of flow rate, volume, or heating value." The BLM uses these logs to verify that the flow computer is properly calculating the volume of gas on which royalty is due.

The generation and retention of configuration logs is required by virtually all gas sales contracts involving orifice meters and EGMs, and is required by industry standards. The statewide NTLs for electronic flow computers also require configuration logs. The configuration log must contain the information required by provisions of API's Manual of Petroleum Measurement Standards that are listed in the regulation, with the following additions and clarifications:

- The information required at 43 CFR 3170.7(g) (a regulation that is part of the rulemaking for site security, RIN 1004-AE15, control no. 1004-0207);
- Software/firmware identifiers that comply with applicable API standards;
- For very-low-volume FMPs, the fixed temperature, if not live (˚F), and;
- The static-pressure tap location (upstream or downstream).

While the configuration log is a usual and customary business practice, the BLM included the incremental burdens due to the additional required information as an hourly cost burden in Table 12-2. There are no non-hour cost burdens related to this information collection activity.

**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.**

The BLM authorizes various collection and submission techniques. For example, the BLM accepts testing data on makes and models that are submitted via mail or email.

**Table 3**
**Collection and Submission Techniques**

| A.<br>Type of Response | B.<br>Collection and Submission Techniques |
|---|---|
| Transducers – Test Data Collection and Submission for Existing Makes and Models<br>43 CFR 3175.43 and 3175.130<br>One-Time | Data submitted by the manufacturer to the BLM via mail or email. |
| Transducers – Test Data Collection and Submission for Future Makes and Models<br>43 CFR 3175.4 and 3175.130<br>Annual | Data collected by the testing facility and submitted to the BLM via mail or email. |
| Flow-Computer Software – Test Data Collection and Submission for Existing Makes and Models<br>43 CFR 3175.44 and 3175.140 through 3175.144<br>One-Time | Data collected by the testing facility and submitted to the BLM via mail or email. |
| Flow-Computer Software – Test Data Collection and Submission for Future Makes and Models<br>43 CFR 3175.44 and 3175.140 through 3175.144<br>Annual | Data collected by the testing facility and submitted to the BLM via mail or email. |
| Isolating Flow Conditioners – Test Data Collection and Submission for Existing Makes and Models<br>43 CFR 3175.46<br>One-Time | Data collected by the testing facility and submitted to the BLM via mail or email. |
| Differential Primary Devices Other than Flange-Tapped Orifice Plates – Test Data Collection and Submission for Existing Makes and Models<br>43 CFR 3175.47<br>One-Time | Data collected by the testing facility and submitted to the BLM via mail or email. |

| A.<br>Type of Response | B.<br>Collection and Submission Techniques |
|---|---|
| Linear Measurement Devices– Test Data Collection and Submission for Existing Makes and Models<br>43 CFR 3175.48<br>One-Time | Data collected by the testing facility and submitted to the BLM via mail or email. |
| Linear Measurement Devices – Test Data Collection and Submission for Future Makes and Models<br>43 CFR 3175.48<br>Annual | Data collected by the testing facility and submitted to the BLM via mail or email. |
| Accounting Systems – Test Data Collection and Submission for Existing Makes and Models<br>43 CFR 3175.49<br>One-Time | Data collected by the operators from their accounting systems and, as provided at 43 CFR 3175.49, from their flow computers. Submitted by the operators to the BLM via mail or email. |
| Accounting Systems – Test Data Collection and Submission for Future Makes and Models<br>43 CFR 3175.49<br>Annual | Data collected by the operators from their accounting systems and, as provided at 43 CFR 3175.49, from their flow computers. Submitted by the operators to the BLM via mail or email. |
| Schedule of Basic Meter Tube Inspection<br>43 CFR 3175.80(h)(3)<br>Annual | Schedule determined by the operators and submitted by the operators to the BLM via mail or email. |
| Basic Inspection of Meter Tubes – Data Collection and Submission<br>43 CFR 3175.80(h)(5)<br>Annual | Data collected manually or key-entered into a computer by the operators and submitted by the operators to the BLM via mail or email. |
| Detailed Inspection of Meter Tubes – Data Collection and Submission<br>43 CFR 3175.80(i) and (j)<br>Annual | Data collected manually or key-entered into a computer by the operators and submitted by the operators to the BLM via mail or email. |
| Request for Extension of Time for a Detailed Meter Tube Inspection<br>43 CFR 3175.80(i)<br>Annual | Request written by hand or key-entered into a computer by the operators and submitted by the operators to the BLM via mail or email. |

| A.<br>Type of Response | B.<br>Collection and Submission Techniques |
|---|---|
| Maintenance of Data at an FMP<br>43 CFR 3175.91(d) and 3175.101(c)<br>Annual | Data collected manually and posted at the FMP by the operators and accessible to the Authorized Officer at all times. |
| Redundancy Verification Check for Electronic Gas Measurement Systems<br>43 CFR 3175.102(e)(2)<br>Annual | Data collected automatically by the EGM software and submitted by the operators to the BLM via mail or email. |
| Notification of Verification<br>3175.92(e) and 3175.102(f))<br>Annual | Notification written manually or key-entered into a computer by the operators and submitted by the operators to the BLM via mail or email. |
| Sample Cylinder Cleaning – Documentation<br>43 CFR 3175.113(c)(3)<br>Annual | Documentation written manually or key-entered into a computer by the operators and submitted by the operators to the BLM via mail or email. |
| Sample Separator Cleaning – Documentation<br>43 CFR 3175.113(d)(1)<br>Annual | Documentation written manually or key-entered into a computer by the operators and submitted by the operators to the BLM via mail or email. |
| Evacuation and Pre-charge for the Helium Pop Method – Documentation<br>43 CFR 3175.114(a)(2)<br>Annual | Documentation written manually or key-entered into a computer by the operators and submitted by the operators to the BLM via mail or email. |
| O-ring and Lubricant Composition for the Floating Piston Method - Documentation<br>43 CFR 3175.114(a)(3)<br>Annual | Documentation written manually or key-entered into a computer by the operators and submitted by the operators to the BLM via mail or email. |
| Schedule for Spot Sampling<br>43 CFR 3175.113(b)<br>Annual | Schedule written manually or key-entered into a computer by the operators and submitted by the operators to the BLM via mail or email |
| Submission of On-line Gas Chromatograph Specifications<br>43 CFR 3175.117(c)<br>Annual | Manually retrieved by the operators and submitted by the operators to the BLM via mail or email. |
| Quantity Transaction Record – Data Collection and Submission<br>43 CFR 3175.104(a)<br>Annual | Data collected automatically by the electronic gas measurement software and submitted to the BLM by the operators via mail or email. |

| A.<br>Type of Response | B.<br>Collection and Submission Techniques |
|---|---|
| Configuration Log – Data Collection and Submission<br>43 CFR 3175.104(b)<br>Annual | Data collected automatically by the electronic gas measurement software and submitted to the BLM by the operators via mail or email. |
| Gas Chromatograph Verification – Documentation<br>43 CFR 3175.118(c) and(d)<br>Annual | Data collected by the operators manually or via an automated system. Submitted to the BLM by the operators via mail or email. |
| Gas Analysis Report – Entry into Gas Analysis Reporting and Verification System<br>43 CFR 3175.120(f)<br>Annual | Reports submitted to the BLM electronically using the BLM's Gas Analysis Reporting and Verifications System (GARVS) that the BLM is developing. Operators will be required to submit all gas analyses electronically unless a variance is granted to allow paper submission. The variance will only be granted in extreme cases where the operator demonstrates that it is a small business, as defined by the U.S. Small Business Administration, and does not have access to the Internet. |

**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.**

No duplication of information occurs in the information that is collected. The information that is collected is unique to each respondent, lease, and time period and is not available from any other data source. No similar information is available or can be modified to ensure the sufficiency of gas measurement.

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

Nearly all firms involved in developing oil and gas resources are small entities as defined by the Small Business Administration. All respondents, regardless of size, are required to comply with the information collection requirements. The information required from all respondents is limited to the minimum necessary to authorize and regulate gas measurement activities.

**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.**

If we did not collect the information, or collected it less frequently, oil and gas operations could not occur on Federal or Indian trust leases in compliance with pertinent statutes. In addition, the BLM would not be able to ensure that gas removed or sold from Federal and Indian leases is accurately measured and properly reported for royalty determination purposes.

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

- *** requiring respondents to report information to the agency more often than quarterly;**
- *** requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- *** requiring respondents to submit more than an original and two copies of any document;**
- *** requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- *** 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;**
- *** requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- *** 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**
- *** 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.**

Sections 3175.115 and 3175.120 require submission of gas analysis reports to the BLM from spot samples taken at high- and very-high-volume FMPs at least every 3 months and every month, respectively, unless the BLM determines that more frequent analysis is required under § 3175.115(c).

Several information collection activities require a response in fewer than 30 days upon receipt of the request:

- The operator must submit all gas analysis reports to the BLM within 15 days of the due date for the sample as specified in 43 CFR 3175.115.
- A BLM request for information, either while the BLM is witnessing a gas analysis or conducting a production audit, generally requires a response within 2 weeks. The pertinent regulations are at 43 CFR 3175.102(e)(2), 3175.113(c)(3), 3175.113(d)(1), 3175.118(c) and (d), 3175.104(a), and 3175.104(b).
- An operator must produce proof of test equipment recertification immediately when a BLM inspector is present to witness the verification of a mechanical record or EGM system under 43 CFR 3175.102(h), or to witness a gas sample being taken under 43 CFR 3175.113(c)(3) or 3175.114(a)(3).

**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 three 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 three 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.**

On October 18, 2019, the BLM published the required 60-day notice in the Federal Register (84 FR 55983), and the comment period ended on December 17, 2019. The BLM received no comments.

The BLM has consulted with the following respondents to obtain their views on the availability of data; frequency of collection; the clarity of instructions; the recordkeeping, disclosure, and reporting formats; and on the data elements to be recorded, disclosed, or reported:

Regulatory Manager
XTO Energy
Spring, TX

Senior Manager, Measurement
WPX Energy
Tulsa, OK

Measurement Manager
Extraction Oil & Gas
Denver, CO

The burden estimates were not adjusted as a result of these consultations. The feedback the BLM received did not suggest that we should change the burden estimates.

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

We do not provide payments or gifts to the respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the**

**assurance in statute, regulation, or agency policy.**

The 2016 rule provides no assurance of confidentiality to respondents.

**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.**

We do not require respondents to answer questions of a sensitive nature.

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

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

The BLM estimates the following annual burdens for respondents:

- 430,782 responses;
- 95,068 hours; and
- A dollar equivalent of $6,268,783.92.

The burdens to respondents include time spent for compiling and preparing information. The frequency of response for each of the information collections is "on occasion," with the following exceptions for one-time activities pertaining to equipment in operation before January 17, 2017:

- Transducers – Test Data Collection and Submission for Existing Makes and Models;
- Flow-Computer Software – Test Data Collection and Submission for Existing Makes and Models;

- Isolating Flow Conditioners − Test Data Collection and Submission for Existing Makes and Models;
- Differential Primary Devices Other than Flange-Tapped Orifice Plates – Test Data Collection and Submission for Existing Makes and Models;
- Linear Measurement Devices– Test Data Collection and Submission for Existing Makes and Models; and
- Accounting Systems − Test Data Collection and Submission for Existing Makes and Models.

The following table shows the BLM's estimates of the hour burdens for respondents. The mean hourly wages were determined using national Bureau of Labor Statistics data at http://www.bls.gov/oes/current/oes_nat.htm.

The benefits multiplier of 1.4 is supported by information at http://www.bls.gov/news.release/ecec.nr0.htm.

**Table 12-1**
**Weighted Average Hourly Costs**

| A. Position and Occupation Code | B. Mean Hourly Pay Rate | C. Hourly Rate with Benefits (Column B x 1.4) | D. Percent of Collection Time Completed by Each Occupation | E. Weighted Average Hourly Costs (Column C x Column D) |
|---|---|---|---|---|
| General Office Clerk (43-9061) | $16.92 | $23.69 | 10% | $2.37 |
| Engineer (17-2199) | $47.80 | $66.92 | 80% | $53.54 |
| Engineering Manager (11-9041) | $71.62 | $100.27 | 10% | $10.03 |
| Totals | — | — | 100% | $65.94 |

Table 12-2 itemizes the estimated annual hour burdens.

**Table 12-2**
**Estimates of Industry Hour Burdens**

| A. Type of Response | B. Number of Responses | C. Hours Per Response | D. Total Hours | E. Dollar Equivalent (Column D x $65.94) |
|---|---|---|---|---|
| Transducers – Test Data Collection and Submission for Existing Makes and Models<br>43 CFR 3175.43 and 3175.130<br>One-Time | 100 | 16 | 1,600 | $105,504.00 |
| Transducers – Test Data Collection and Submission for Future Makes and Models<br>43 CFR 3175.43 and 3175.130<br>Annual | 1 | 16 | 16 | $1,055.04 |
| Flow-Computer Software – Test Data Collection and Submission for Existing Makes and Models<br>43 CFR 3175.44 and 3175.140 through 3175.144<br>One-Time | 100 | 8 | 800 | $52,752.00 |
| Flow-Computer Software – Test Data Collection and Submission for Future Makes and Models<br>43 CFR 3175.44 and 3175.140 through 3175.144<br>Annual | 20 | 8 | 160 | $10,550.40 |
| Isolating Flow Conditioners – Test Data Collection and Submission for Existing Makes and Models<br>43 CFR 3175.46<br>One-Time | 3 | 80 | 240 | $15,825.60 |
| Differential Primary Devices Other than Flange-Tapped Orifice Plates – Test Data Collection and Submission for Existing Makes and Models<br>43 CFR 3175.47<br>One-Time | 3 | 80 | 240 | $15,825.60 |

| A.<br>Type of Response | B.<br>Number of Responses | C.<br>Hours Per Response | D.<br>Total Hours | E.<br>Dollar Equivalent (Column D x $65.94) |
|---|---|---|---|---|
| Linear Measurement Devices– Test Data Collection and Submission for Existing Makes and Models<br>43 CFR 3175.48<br>One-Time | 5 | 80 | 400 | $26,376.00 |
| Linear Measurement Devices – Test Data Collection and Submission for Future Makes and Models<br>43 CFR 3175.48<br>Annual | 1 | 80 | 80 | $5,275.20 |
| Accounting Systems − Test Data Collection and Submission for Existing Makes and Models<br>43 CFR 3175.49<br>One-Time | 20 | 80 | 1,600 | $105,504.00 |
| Accounting Systems – Test Data Collection and Submission for Future Makes and Models<br>43 CFR 3175.49<br>Annual | 2 | 80 | 160 | $10,550.40 |
| Schedule of Basic Meter Tube Inspection<br>43 CFR 3175.80(h)(3)<br>Annual | 936 | 8 | 7,488 | $493,758.72 |
| Basic Inspection of Meter Tubes – Data Collection and Submission<br>43 CFR 3175.80(h)(5)<br>Annual | 9,358 | 0.1 | 936 | $61,719.84 |
| Detailed Inspection of Meter Tubes – Data Collection and Submission<br>43 CFR 3175.80(i) and (j)<br>Annual | 4,464 | 0.5 | 2,232 | $147,178.08 |
| Request for Extension of Time for a Detailed Meter Tube Inspection<br>43 CFR 3175.80(i)<br>Annual | 1,116 | 0.5 | 558 | $36,794.52 |
| Maintenance of Data at an FMP<br>43 CFR 3175.91(d) and 3175.101(c)<br>Annual | 68,684 | 0.1 | 6,868 | $452,875.92 |

| A.<br>Type of Response | B.<br>Number of Responses | C.<br>Hours Per Response | D.<br>Total Hours | E.<br>Dollar Equivalent (Column D x $65.94) |
|---|---|---|---|---|
| Notification of Verification<br>43 CFR 3175.92(e) and 3175.102(f))<br>Annual | 1,172 | 1 | 1,172 | $77,281.68 |
| Redundancy Verification Check for Electronic Gas Measurement Systems<br>43 CFR 3175.102(e)(2)<br>Annual | 1,000 | 0.5 | 500 | $32,970.00 |
| Quantity Transaction Record – Data Collection and Submission<br>43 CFR 3175.104(a)<br>Annual | 3,185 | 0.5 | 1,593 | $105,042.42 |
| Configuration Log – Data Collection and Submission<br>43 CFR 3175.104(b)<br>Annual | 3,185 | 0.5 | 1,593 | $105,042.42 |
| Schedule for Spot Sampling<br>43 CFR 3175.113(b)<br>Annual | 1,514 | 1 | 1,514 | $99833.16 |
| Sample Cylinder Cleaning – Documentation<br>43 CFR 3175.113(c)(3)<br>Annual | 75,731 | 0.1 | 7,573 | $499,363.62 |
| Sample Separator Cleaning – Documentation<br>43 CFR 3175.113(d)(1)<br>Annual | 7,573 | 0.1 | 757 | $49,916.58 |
| Evacuation and Pre-charge for the Helium Pop Method – Documentation<br>43 CFR 3175.114(a)(2)<br>Annual | 7,573 | 0.1 | 757 | $49,916.58 |
| O-ring and Lubricant Composition for the Floating Piston Method – Documentation<br>43 CFR 3175.114(a)(3)<br>Annual | 3,787 | 0.1 | 379 | $24,991.26 |

| A. Type of Response | B. Number of Responses | C. Hours Per Response | D. Total Hours | E. Dollar Equivalent (Column D x $65.94) |
|---|---|---|---|---|
| Gas Analysis − Spot Sampling 43 CFR 3175.115(a) and 3175.115(b) Annual | 82,777 | 0.1 | 8,278 | $545,851.32 |
| Gas Analysis − Composite Sampling 43 CFR 3175.115(b)(5) One-Time | 210 | 0.1 | 21 | $1,384.74 |
| On-line Gas Chromatograph Specifications − Submission 43 CFR 3175.117(c) Annual | 20 | 1 | 20 | $1,318.80 |
| Gas Chromatograph Verification − Documentation 43 CFR 3175.118(c) and (d) Annual | 2,461 | 0.5 | 1,231 | $81,172.14 |
| Gas Analysis − Extended Gas Analysis 43 CFR 3175.119 Annual | 2,160 | 0.1 | 216 | $14,243.04 |
| Gas Analysis Report − Entry of Data into the Gas Analysis Reporting and Verification System (GARVS) 43 CFR 3175.120(f) Annual | 153,621 | 0.3 | 46,086 | $3,038,910.84 |
| Totals | 430782 | − | 95068 | $6,268,783.92 |

**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.)**

*** The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) 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.**

* **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens 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.**
* **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.**

No filing fees are associated with this control number.

We estimate $24,600,894 in annual non-hour burdens. Some of these annual non-hour burdens are a result of requirements to hire qualified testing facilities to test makes and models of equipment and software that go into use after the effective date of the rule. The other non-hour burdens are the result of requirements pertaining to operation and maintenance, taking into account costs associated with generating the required information.

The non-hour burdens include some one-time burdens involved in the initial implementation of this rule. Most of them are associated with requirements to hire qualified test facilities to test makes and models of existing equipment and software. In addition, one activity (Gas Analysis − Composite Samplers (43 CFR 3175.115(b)(5)) requires operators to purchase composite samplers for spot sampling at about one-quarter of all very-high-volume FMPs at an estimated annualized cost of $1,699,116. That amount is included in the estimated annual and annualized non-burden estimate shown below in Table 13.

The following non-hour cost burdens are associated with this control number.

**Table 13**
**Estimates of Non-Hour Burdens**

| A. Type of Response | B. Description of Non-Hour Costs | C. Number of Actions | D. Cost Per Action | E. Total Cost |
|---|---|---|---|---|
| Transducers – Test Data Collection and Submission for Future Makes and Models 43 CFR 3175.43 and 3175.130 Annual | Test future transducer make or model at a qualified testing facility | 1 future make or model per year | $20,000 per test | $20,000 |
| Flow-Computer Software – Test Data Collection and Submission for Existing Makes and Models 43 CFR 3175.44 and 3175.140 through 3175.144 One-Time | Test existing flow computer software versions at a qualified testing facility | 100 existing versions | $5,000 per test | $500,000 |
| Flow-Computer Software – Test Data Collection and Submission for Future Makes and Models 43 CFR 3175.44 and 3175.140 through 3175.144 Annual | Test future flow computer software versions at a qualified testing facility | 20 future versions per year | $5,000 per test | $100,000 |
| Isolating Flow Conditioners − Test Data Collection and Submission for Existing Makes and Models 43 CFR 3175.46 One-Time | Test existing flow conditioner makes and models at a qualified testing facility | 3 existing makes and models | $20,000 per test | $60,000 |
| Differential Primary Devices Other than Flange-Tapped Orifice Plates – Test Data Processing for Existing Makes and Models 43 CFR 3175.47 One-Time | Test existing primary device makes and models at a qualified testing facility | 3 existing makes and models | $40,000 per test | $120,000 |

| A.<br>Type of Response | B.<br>Description of Non-Hour Costs | C.<br>Number of Actions | D.<br>Cost Per Action | E.<br>Total Cost |
|---|---|---|---|---|
| Linear Measurement Devices– Test Data Collection and Submission for Existing Makes and Models<br>43 CFR 3175.48<br>One-Time | Test existing linear device makes and models at a qualified testing facility | 5 existing makes and models | $40,000 per test | $200,000 |
| Linear Measurement Devices – Test Data Collection and Submission for Future Makes and Models<br>43 CFR 3175.48<br>Annual | Test future linear device make or model at a qualified testing facility | 1 future make or model per year | $40,000 per test | $40,000 |
| Basic Inspection of Meter Tubes − Data Collection and Submission<br>43 CFR 3175.80(h)(5)<br>Annual | Perform basic meter tube inspections for FMPs as required:<br>• Low-volume: Every 5 years or 20% each year;<br>• High-volume: Every 2 years or 50% each year, and;<br>• Very-high-volume: Every year or 100% each year. | 9,358 basic meter tube inspections per year | $167 per basic meter tube inspection | $1,562,786 |

| A. Type of Response | B. Description of Non-Hour Costs | C. Number of Actions | D. Cost Per Action | E. Total Cost |
|---|---|---|---|---|
| Detailed Inspection of Meter Tubes<br>43 CFR 3175.80(i) and (j)<br>Annual | Perform detailed meter tube inspections for FMPs as estimated:<br>• Low-volume: Every 10 years or 10% each year;<br>• High-volume: Every 4 years or 25% each year, and;<br>• Very-high-volume: Every 4 years or 25% each year | 4,464 detailed meter tube inspections per year | $937 per detailed meter tube inspection | $4,182,768 |
| Maintenance of Data at FMPs<br>43 CFR 3175.91(d) and 3175.101(c)<br>Annual | Maintain data card in the field at all FMPs | 68,684 total FMPs | $40 per FMP | $2,747,360 |
| Sample Cylinder Cleaning – Documentation<br>43 CFR 3175.113(c)(3)<br>Annual | Clean cylinders at every second gas sampling (151,461 estimated samplings per year) | 75,731 cylinder cleanings per year | $20 per cylinder cleaning | $1,514,620 |
| Sample Separator Cleaning<br>43 CFR 3175.113(d)(1)<br>Annual | Clean sample separators at every 20$^{th}$ gas sampling (151,461 estimated samplings per year) | 7,573 separator cleanings per year | $20 per separator cleaning | $151,460 |

| A. Type of Response | B. Description of Non-Hour Costs | C. Number of Actions | D. Cost Per Action | E. Total Cost |
|---|---|---|---|---|
| Gas Analysis – Spot Sampling 43 CFR 3175.115(a) and (b) Annual | Perform spot sampling beyond what is usual and customary for low-volume, high-volume, and very-high-volume FMPs | 82,777 spot samples per year | $100 per spot sample | $8,277,700 |
| Gas Analysis – Composite Sampling 43 CFR 3175.115(b)(5) One-Time | Purchase composite samplers for spot sampling for about one-quarter of all very-high-volume FMPs | 210 composite sampler purchases | $20,000 per composite sampler | $4,200,000 |
| Gas Chromatograph Verification 43 CFR 3175.118(c) and (d) Annual | Perform gas chromatograph verification every other time a portable sampler is used on each of an estimated 50 FMPs or every other time a laboratory sampler is used on each of an estimated 80 FMPs | 2,461 total verifications per year | $200 per verification | $492,200 |
| Gas Analysis – Extended Gas Analysis 43 CFR 3175.119 Annual | Perform extended analysis when the concentration of C6+ exceeds 0.5 mole percent, or periodically test and adjust the C6+ value. | 2,160 extended gas analyses per year | $200 per extended gas analysis | $432,000 |
| Totals | | | | 24000894 |

**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 estimated annual Federal cost is $7,837,289.08. The costs shown in Tables 14-1 and 14-2 total $7,670,519.08. In addition, there is a one-time cost of $500,000 for the BLM to contract for development of the Gas Analysis Reporting and Verification System (GARVS). In connection with the information collection activity at 43 CFR 3175.120, GARVS will be a database and analysis software that will be capable of electronically receiving gas analysis reports from operators, analyzing the content of those reports, and notifying the BLM of potential violations. When annualized over three years, the one-time cost of GARVS development equals $166,770 per year.

GARVS also will require additional Federal hourly burdens for the BLM's production accounting staff to resolve potential violations identified by GARVS. This cost is included in Table 14-2. For this cost, the BLM assumed that 10 percent of reports would flag potential violations, and it would take BLM staff 0.5 hours to resolve each flag. The BLM also believes this burden will ebb as operators become educated on the requirements of the 2016 rule.

Several regulations that are listed in Table 14-2 do not involve immediate Federal processing because they require operators to maintain records and make them available to the BLM at a later date at the request of the BLM (usually during production audits). Those burdens to the respondent and to the Federal government are included in the estimated burdens for "Required Recordkeeping and Records Submission" for 43 CFR 3170.7, a regulation that is part of the regulations for site security and control no. 1004-0207.

The remaining information collection activities require some degree of Federal review and processing, or require the development of software. The PMT approval process for flow conditioners, differential primary devices other than flange-tapped orifice plates, linear meters, accounting systems, transducers, and flow computer software, all require the PMT to receive test data and analyze that data. Based on this review, the PMT will recommend the approval of the device, approval of the device with conditions, or denial of the device. The BLM Director will review the recommendation from the PMT and make a final decision. If approved, the device will be added to the list of approved devices at www.blm.gov. All these costs are considered to be hourly burdens and are shown in Table 14-2 as such. This includes the time for the PMT to review and analyze the data, for the BLM Director to review the PMT recommendation and make a decision of what course of action to take and, if approved, to post the device on the BLM website.

Table 14-1 shows the BLM's estimate of the hourly cost burdens to the Federal government. The hourly pay rates (Column B) are based on U.S. Office of Personnel Management data at: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/RUS_h.pdf.

The benefits multiplier of 1.6 is implied by information at

http://www.bls.gov/news.release/ecec.nr0.htm.

**Table 14-1**
**Weighted Average Hourly Cost Calculation**

| A. Position | B. Mean Hourly Pay Rate | C. Hourly Rate with Benefits (Column B x 1.6) | D. Percent of Collection Time | E. Weighted Average Hourly Cost (Column C x Column D) |
|---|---|---|---|---|
| General Office Clerk GS-6, step 5 | $20.55 | $32.88 | 10% | $3.29 |
| Professional GS-11, step 5 | $33.80 | $54.08 | 80% | $43.26 |
| Managerial GS-13, step 5 | $48.17 | $77.07 | 10% | $7.71 |
| Totals | — | — | 100% | $54.26 |

The estimated annual Federal costs are itemized in Table 14-2, below.

**Table 14-2**
**Estimates of Government Hour and Cost Burdens**

| A. Type of Response | B. Number of Responses | C. Hours per Response | D. Total Hours (Column B x Column C) | E. Dollar Equivalent (Column D x $54.26) |
|---|---|---|---|---|
| Transducers – Test Data Processing for Existing Makes and Models 43 CFR 3175.130 and 3175.43 One-Time | 100 | 15.5 | 1,550 | $84,103.00 |
| Transducers – Test Data Processing for Future Makes and Models 43 CFR 3175.130 and 3175.43 Annual | 1 | 15.5 | 16 | $868.16 |
| **A. Type of Response** | **B. Number of Responses** | **C. Hours per Response** | **D. Total Hours (Column B x Column C)** | **E. Dollar Equivalent (Column D x $54.26)** |

| | | | | |
|---|---|---|---|---|
| Flow-Computer Software – Test Data Processing for Existing Makes and Models<br>43 CFR 3175.44 and 3175.140 through 3174.144<br>One-Time | 100 | 8.0 | 800 | $43,408.00 |
| Flow-Computer Software – Test Data Processing for Future Makes and Models<br>43 CFR 3175.44 and 3175.140 through 3175.144<br>Annual | 20 | 8.0 | 160 | $8,681.60 |
| Isolating Flow Conditioners – Test Data Collection and Submission for Existing Makes and Models<br>43 CFR 3175.46<br>One-Time | 3 | 80.0 | 240 | $13,022.40 |
| Differential Primary Devices Other than Flange-Tapped Orifice Plates – Test Data Collection and Submission for Existing Makes and Models<br>43 CFR 3175.47<br>One-Time | 3 | 120.0 | 360 | $19,533.60 |
| Linear Measurement Devices – Test Data Processing for Existing Makes and Models<br>43 CFR 3175.48<br>One-Time | 5 | 120.0 | 600 | $32,556.00 |
| Linear Measurement Devices – Test Data Processing for Future Makes and Models<br>43 CFR 3175.48<br>Annual | 1 | 120.0 | 120 | $6,511.20 |
| **A.**<br>**Type of Response** | **B.**<br>**Number of Responses** | **C.**<br>**Hours per Response** | **D.**<br>**Total Hours (Column B x Column C)** | **E.**<br>**Dollar Equivalent (Column D x $54.26)** |

| | | | | |
|---|---|---|---|---|
| Accounting Systems − Test Data Collection and Submission for Existing Makes and Models<br>43 CFR 3175.49<br>One-Time | 20 | 80 | 1,600 | $86,816.00 |
| Accounting Systems − Test Data Collection and Submission for Future Makes and Models<br>43 CFR 3175.29<br>Annual | 2 | 80 | 160 | $8,681.60 |
| Schedule of Basic Meter Tube Inspection<br>43 CFR 3175.80(h)(3)<br>Annual | 936 | 8 | 7,488 | $406,298.88 |
| Basic Inspection of Meter Tubes − Data Collection and Submission<br>43 CFR 3175.80(h)(5)<br>Annual | 9,358 | 1 | 9,358 | $507,765.00 |
| Detailed Inspection of Meter Tubes − Data Collection and Submission<br>43 CFR 3175.80(i) and 3175.80(j)<br>Annual | 4,464 | 1 | 4,464 | $242,216.64 |
| Request for Extension of Time for a Detailed Meter Tube Inspection<br>43 CFR 3175.80(i)<br>Annual | 1,116 | 1 | 1,116 | $60,554.16 |
| Maintenance of Data at an FMP<br>43 CFR 3175.91(d) and 3175.101(c)<br>Annual | 68,684 | 1 | 68,684 | $3,726,793.84 |
| Notification of Verification<br>43 CFR 3175.92€ and 3175.102(f)<br>Annual | 1,172 | 1 | 1,172 | $63,592.72 |
| **A.<br>Type of Response** | **B.<br>Number of Responses** | **C.<br>Hours per Response** | **D.<br>Total Hours (Column B x Column C)** | **E.<br>Dollar Equivalent (Column D x $54.26)** |

| | | | | |
|---|---|---|---|---|
| Redundancy Verification Check for Electronic Gas Measurement Systems<br>43 CFR 3175.102(e)(2)<br>Annual | 1,000 | 1 | 1,000 | $54,260.00 |
| Quantity Transaction Record − Data Collection and Submission<br>43 CFR 3175.104(a)<br>Annual | 3,185 | 1 | 3,185 | $172,818.10 |
| Configuration Log − Data Collection and Submission<br>43 CFR 3175.104(b)<br>Annual | 3,185 | 1 | 3,185 | $172,818.10 |
| Schedule for Spot Sampling<br>43 CFR 3175.113(b)<br>Annual | 1,514 | 1 | 1,514 | $82,149.64 |
| Sample Cylinder Cleaning − Documentation<br>43 CFR 3175.113(c)(3)<br>Annual | 75,731 | 0.1 | 7,573 | $410,910.98 |
| Sample Separator Cleaning − Documentation<br>43 CFR 3175.113(d)(1) | 7,573 | 0.1 | 757 | $41,074.82 |
| Evacuation and Pre-charge for the Helium Pop Method − Documentation<br>43 CFR 3175.114(a)(2)<br>Annual | 7,573 | 0.1 | 757 | $41,074.82 |
| O-ring and Lubricant Composition for the Floating Piston Method − Documentation<br>43 CFR 3175.114(a)(3)<br>Annual | 3,787 | 0.1 | 379 | $20,564.54 |
| Gas Analysis − Spot Sampling<br>43 CFR 3175.115(a) and 3175.115(b)<br>Annual | 82,777 | 0.1 | 8,278 | $449,164.28 |
| **A.<br>Type of Response** | **B.<br>Number of Responses** | **C.<br>Hours per Response** | **D.<br>Total Hours (Column B x Column C)** | **E.<br>Dollar Equivalent (Column D x $54.26)** |

| | | | | |
|---|---|---|---|---|
| Gas Analysis − Composite Sampling<br>43 CFR 3175.115(b)(5)<br>One-Time | 210 | 0.1 | 21 | $1,139.46 |
| On-line Gas Chromatograph Specifications − Submission<br>43 CFR 3175.117(c)<br>Annual | 20 | 1 | 20 | $1,085.20 |
| Gas Chromatograph Verification − Documentation<br>43 CFR 3175.118(c) and 3175.118(d)<br>Annual | 2,461 | 0.5 | 1,231 | $66,794.06 |
| Gas Analysis − Extended Gas Analysis<br>43 CFR 3175.119<br>Annual | 2,160 | 0.1 | 216 | $11,720.16 |
| Gas Analysis Report − Entry of Data into the Gas Analysis Reporting and Verification System (GARVS)<br>43 CFR 3175.120(f)<br>Annual | 153,621 | 0.1 | 15,362 | $833,542.12 |
| Totals | 430,782 | − | 141,366 | $7,670,519.08 |

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

There are no program changes or adjustments.

**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.**

The BLM will not publish the results of this collection.

**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.**

The BLM will display the expiration date of the OMB approval.

**18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."**

There are no exceptions to the certification statement.