

Supporting Statement A
30 CFR 250, subpart H, Oil and Gas Production Safety Systems – Revisions
(Final Rule)
OMB Control Number 1014-0003
Current Expiration Date: 11/30/2019

Terms of Clearance: None

General Instructions

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

Specific Instructions

A. Justification

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

The Outer Continental Shelf (OCS) Lands Act (OCSLA), as amended (43 U.S.C. 1331 *et seq.* and 43 U.S.C. 1801 *et seq.*), authorizes the Secretary of the Interior to prescribe rules and regulations to administer leasing of mineral resources on the Outer Continental Shelf (OCS). Such rules and regulations will apply to all operations conducted under a lease, right-of-way, or a right-of-use and easement. Operations on the OCS must preserve, protect, and develop oil and natural gas resources in a manner that is consistent with the need to make such resources available to meet the Nation’s energy needs as rapidly as possible; to balance orderly energy resource development with protection of human, marine, and coastal environments; to ensure the public a fair and equitable return on the resources of the OCS; and to preserve and maintain free enterprise competition. Section 1332(6) states that “operations in the Outer Continental Shelf should be conducted in a safe manner by well trained personnel using technology, precautions, and other techniques sufficient to prevent or minimize the likelihood of blowouts, loss of well control, fires, spillages, physical obstructions to other users of the waters or subsoil and seabed, or other occurrences which may cause damage to the environment or to property or endanger life or health.”

In addition to the general rulemaking authority of the OCSLA at 43 U.S.C. 1334, section 301(a) of the Federal Oil and Gas Royalty Management Act (FOGRMA), 30 U.S.C. 1751(a), grants authority to the Secretary to prescribe such rules and regulations as are reasonably necessary to carry out FOGRMA’s provisions. While the majority of FOGRMA is directed to royalty collection and enforcement, some provisions apply to offshore operations. For example, section 108 of FOGRMA, 30 U.S.C. 1718, grants the Secretary broad authority to inspect lease sites for the purpose of determining whether there is compliance with the mineral leasing laws. Section 109(c)(2) and (d)(1), 30 U.S.C. 1719(c)(2) and (d)(1), impose substantial civil penalties for failure to permit lawful inspections and for knowing or willful preparation or submission of false, inaccurate, or misleading reports, records, or other information.

Because the Secretary has delegated some of the authority under FOGRMA to BSEE, 30 U.S.C. 1751 is included as additional authority for these requirements.

The Independent Offices Appropriations Act (31 U.S.C. 9701), the Omnibus Appropriations Bill (Pub. L. 104-133, 110 Stat. 1321, April 26, 1996), and Office of Management and Budget (OMB) Circular A-25, authorize Federal agencies to recover the full cost of services that confer special benefits. Under the Department of the Interior's (DOI) implementing policy, the Bureau of Safety and Environmental Enforcement (BSEE) is required to charge the full cost for services that provide special benefits or privileges to an identifiable non-Federal recipient above and beyond those which accrue to the public at large. Facility Production Safety System Applications are subject to cost recovery and BSEE regulations specify service fees for these applications.

On March 28, 2017, the President issued executive order (E.O.) 13783, "Promoting Energy Independence and Economic Growth," (82 Fed. Reg.16093). This executive order directed Federal agencies to review all existing regulations and other agency actions and, ultimately, to suspend, revise, or rescind any such regulations or actions that unnecessarily burden the development of domestic energy resources beyond the degree necessary to protect the public interest or otherwise comply with the law. E.O. 13783 also required a review of existing rules that may burden energy development and the suspension, withdrawal, or revision of those that unduly burden oil and gas development beyond what is needed to protect the public interest or comply with the law.

On April 28, 2017, the President issued E.O. 13795, "Implementing an America-First Offshore Energy Strategy," (82 FR 20815). The E.O. directed the Secretary of the Interior (Secretary) to reconsider the Well Control Rule and take appropriate action to revise any related rules for consistency with the order's stated policy "to encourage energy exploration and production, including on the Outer Continental Shelf, in order to maintain the Nation's position as a global energy leader and foster energy security and resilience for the benefit of the American people, while ensuring that any such activity is safe and environmentally responsible" and "publish for notice and comment a proposed rule revising that rule, if appropriate and as consistent with law."

To further implement E.O. 13783, the Secretary issued Secretarial Order (S.O.) 3349, "American Energy Independence" on March 29, 2017. The order directed the Department of the Interior to review all existing regulations "that potentially burden the development or utilization of domestically produced energy resources." To further implement E.O.13795, the Secretary issued S.O. 3350, "America-First Offshore Energy Strategy," on May 1, 2017, which directed BSEE to review the Well Control Rule and related rulemakings. BSEE interpreted both orders to apply to the Subpart H – Production Safety System regulations (Subpart H Rule).

As part of its response to E.O.s 13783 and 13795, and S.O.s 3349 and 3350, BSEE reviewed the previous Subpart H Rule and is proposing revisions to the current regulations that could potentially reduce burdens on operators without impacting safety and protections of the environment. In addition, in response to comments from industry received since the previous Subpart H Rulemaking was published, BSEE is proposing certain revisions to clarify the existing regulations.

Regulations governing production safety systems are primarily covered in 30 CFR 250, subpart H. This final rule will amend and update the Subpart H, Oil and Gas Production Safety Systems regulations. On September 7, 2016, BSEE published a final rule completely revising Subpart H (81 FR 61834). That final rule addressed issues such as production safety systems, subsurface safety devices, and safety device testing. These systems play a critical role in protecting workers and the environment. Most of

the provisions of that rulemaking were effective on November 7, 2016. Since that time, BSEE has become aware that certain provisions in that rulemaking created potentially burdensome requirements to oil and natural gas production operators on the OCS, without significantly increasing safety of the workers or protection of the environment. While implementing the requirements from the previous rulemaking, BSEE reassessed a number of the provisions in the original rulemaking and determined that some provisions could be revised to reduce or eliminate some of the concerns expressed by the operators, the burden, while providing the same level of safety and protection of the environment. Also, during the original rulemaking (original Subpart H rewrite), BSEE inadvertently omitted costs for Professional Engineers required to stamp documents. Even though this rulemaking reduces the amount of information a PE must stamp, we are adding those non-hour cost burdens in this rulemaking.

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.

Subpart H:

BSEE uses the information collected under subpart H (see the burden table under A.12 to see what specific information BSEE collects) to:

- review safety system designs prior to installation to ensure that minimum safety standards will be met;
- evaluate equipment and/or procedures used during production operations;
- review records of erosion control to ensure that erosion control programs are effective;
- review plans to ensure safety of operations when more than one activity is being conducted simultaneously on a production facility;
- review records of safety devices to ensure proper maintenance during the useful life of that equipment; and
- verify proper performance of safety and pollution prevention equipment (SPPE).

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

Currently, 50 percent of all information for this collection is submitted electronically via email, CDs, TIMS Web, and BSEE's facility safety system (FSS) which is an electronic permitting system that is part of BSEE's eInspections system. BSEE is currently expanding the eInspection system's capability to accept more information going forward.

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.

BSEE and other Federal Government agencies have Memoranda of Understanding that define the responsibilities of their agencies with respect to activities on the OCS. These are effective in avoiding

duplication of regulations and most reporting and recordkeeping requirements. The information collected is unique to the site, well, or operation, and is not available from other sources.

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

This collection of information could have a significant economic effect on a substantial number of small entities. Any direct effects primarily impact the OCS lessees and operators. However, many of the OCS lessees and operators have less than 500 employees and are considered small businesses as defined by the Small Business Administration. Regulations require safe work practices and protection of the environmental resources; and because of the factors involved when drilling for oil, gas, or sulfur, the hour burden on any small entity subject to these regulations cannot be reduced to accommodate them.

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 BSEE did not collect the information, we could not carry out the mandate of the OCS Lands Act to ensure safe operations in the OCS. Specifically, we could not evaluate equipment and/or procedures that lessees and operators use during production operations, including evaluation of requests for departures or use of alternate procedures or equipment under 30 CFR 250, subpart A. Information is also needed to verify that production operations are safe and protect the human, marine, and coastal environment. BSEE inspectors review the records required by this subpart to verify compliance with testing and minimum safety requirements.

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

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

Under 250.803(b), industry is required to perform an investigation and a failure analysis within 120 days of having a safety equipment failure to determine the cause of the failure and that the results and any corrective action are documented.

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

Requirements for safety and pollution prevention equipment (SPPE) contain information that must be submitted in fewer than 30 days to ensure that issues that led to SPPE failure are identified and addressed quickly. The notification/contacts under Subsea and Subsurface Safety Systems – Subsea Trees, all of these requirements pertain to SPPE and BSEE needs to be aware of any issues that could interfere with the operator identifying problems with these critical pieces of safety equipment.

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

Not applicable in this collection.

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

Under § 250.876, industry is required to remove and inspect, repair, or replace the fire tube for tube-type heaters every 5 years. Due to the regulatory requirement, we have required industry to retain the documents for at least one complete inspection cycle.

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

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

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

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

Not applicable in this collection.

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

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

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

As required in 5 CFR 1320.11, on December 29, 2017, BSEE provided the initial 60-day review and comment process through the preamble of the proposed rulemaking (82 FR 61703). BSEE received 733 separate sets of comments, including some comments that had a total of over 60,000 signatures attached to the comments. BSEE received comments from a wide range of stakeholders, including industry trade groups and individual companies, State and local governments, Tribal authorities, members of the U.S. Congress, environmental groups, SDOs, and private citizens. No individual respondents were contacted due to the proposed rulemaking nature of the collection. However, BSEE based many of its estimates on the latest data and information available from previous contacts with respondents to the current regulations and its staff expertise. BSEE did not receive any comments pertaining to the information collection.

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

BSEE will not provide payment or gifts to respondents in this collection.

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

BSEE will protect proprietary information according to 30 CFR 250.197, *Data and information to be made available to the public or for limited inspection*, 30 CFR part 252, *OCS Oil and Gas Information Program*, and the Freedom of Information Act (5 U.S.C. 552) and its implementing regulations (43 CFR 2).

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

The collection does not include sensitive or private questions.

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

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

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

Potential respondents include Federal OCS oil, gas, and sulfur lessees and operators. It should be noted that not all of the potential respondents will submit information in any given year, and some may submit multiple times. The burden estimates include the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Submissions are generally on occasion and are mandatory. Current subpart H regulations have 95,997 hours and \$5,582,481 non-hour cost burdens (cost recovery fees) approved by OMB. Due to this rulemaking, the revisions to the collection would result in a total of 93,385 hours and \$10,912,696 non-hour cost burdens. Refer to the following table for a breakdown of the burdens.

Burden Table

Citation 30 CFR 250 Subpart H and NTL(s)	Reporting and Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (rounded)
		Non-Hour Cost Burdens		
804; 805; 826; 828(c); 834; 838; 839; 870; 873; 874; 875; 880	References to Deepwater Operations Plans (DWOPs).	Burdens are covered under 1014-0024.		
804;	Reference to Applications for Permit to Drill	Burdens are covered under 1014-0025.		

837(b)(2)	(APD).			
804; 813; 828(b); 837(b)(2)	Reference to Applications for Permit to Modify (APM).	Burdens are covered under 1014-0026.		
800 – 890	Request approval to use new or alternative procedures or equipment; or departures to the operating requirements along with supporting documentation if applicable.	Burdens are covered under 1014-0022.		
General Requirements				
800(a)	Requirements for your production safety system application.	Burden included with specific requirements below.		0
800(a); 880(a)(1), (2)	Prior to production, request approval and pre-production inspection; notify BSEE 72 hours before commencement; notify upon commencement of production.	1	41 requests	41
801(c)	Request evaluation and approval from OORP that includes all relevant information of other quality assurance programs by appropriate qualified entity; or third-party certification mark covering manufacture of SPPE.	34	1 request	34
801(c); 802(c)(1);	Independent third-party for reviewing and certifying various statements throughout this subpart.	\$30,000 for 3 reviews = \$90,000		
802(c)(1)	Maintain a description of the process used to ensure the device is designed to function as required in 802(a). Make available to BSEE.	1	250 submissions	250
802(c)(5), (e)	Document all manufacturing, traceability, quality control, installation, testing, repair, redress, performance, and inspection requirements, <i>etc.</i> Retain all required documentation of SPEE equipment until 1 year after the date of decommissioning the equipment.	2	30 documents	60
803(a), (d)	Within 30 days of discovery and identification of SPPE failure, provide a written notice of equipment failure to manufacturer and Chief, OORP, or BSEE designee.	2	10 notices	20
803(b), (d)	Document and determine the results of the SPPE failure within 120 days and corrective action taken; if appropriate, per requirements, give copy of report to manufacturer and Chief, OORP, or BSEE designee.	5	10 documents	50
803(c), (d)	Submit to Chief of OORP or BSEE designee modified procedures you made if notified by manufacturer of design changes or you changed operating or repair procedures as result of a failure, within 30 days of changes.	2	1 submittal	2
804(a); 805(b)	Submit detailed info regarding installing SSSVs and related equipment in an HPHT environment with your APD, APM, DWOP, <i>etc.</i>			0
814(a); 815(b); 828(a); 829(b);	BSEE will approve on a case-by-case basis.	1	1 request	1
841(b)	Request District Manager approval of temporary repairs to facility piping not to exceed 30 days.	1	780 requests	780
Subtotal			1,124 responses	1,238 hours
			\$90,000 non-hour cost	

			burdens	
Surface and Subsurface Safety Systems – Dry Trees				
810; 816; 830	Submit request for a determination that a well is incapable of natural flow.	14	11 wells	157
	Verify the no-flow condition of the well annually.	¼		
817(b); 869(a)	Identify well with sign on wellhead that sub-surface safety device is removed; flag safety devices that are out of service; a visual indicator must be used to identify the bypassed safety device.	Not considered IC under 5 CFR 1320.3(b)(2).		0
817(b)	Record removal of subsurface safety device.	Burden included in § 250.890 of this subpart.		0
Subtotal			11 responses	157 hours
Subsea and Subsurface Safety Systems – Subsea Trees				
831; 833(a), (b); 837(c)(5); 838(c); 874(g)(2), (h)(1)	Notify/contact BSEE: (1) if you cannot test all valves and sensors; (2) 48 hours in advance if monitoring ability affected; (3) primary USV designation changes; designating USV2 or another qualified valve; (4) resuming production; (5) 12 hours of detecting loss of communication; immediately if you cannot meet valve closure conditions.	Notifications		7
		(1) ½	6	
		(2) 2	1	
		(3) 1	1	
		(4) ½	1	
		(5) ½	1	
831	Submit a repair/replacement plan to monitor and test.	2	1 submittal	2
837(a)	Request approval to not shut-in a subsea well in an emergency.	½	10 requests	5
837(b)(2)	Develop dropped objects plan	Burden currently covered under 1014-0028.		0
837(b)(2); (c)(2)	Obtain approval to resume production (1) after communication is restored; (2) P/L PSHL sensor.	½	2 approvals	1
838(a)(2); 839(a)(2)	Verify closure time of USV upon request of BSEE.	2	2 verifications	4
838(c)(3)	Request approval to produce after loss of communication - include alternate valve closure table or alternate hydraulic bleed schedule.	2	1 approval	2
Subtotal			26 responses	21 hours
Production Safety Systems				
842;	Submit application, and all required/supporting information, for a production safety system with > 125 components.	26	1 application	26
		\$5,426 per submission x 1 = \$5,426 \$14,280 per offshore visit x 1 = \$14,280 \$7,426 per shipyard visit x 1 = \$7,426 \$30,352 x 1 application = \$30,352 for Professional Engineer Costs		
	25 – 125 components.	19	4 applications	76
		\$1,314 per submission x 4 = \$5,256 \$8,967 per offshore visit x 1 = \$8,967 \$5,141 per shipyard visit x 1 = \$5,141 \$15,176 x 4 applications = \$60,704 for Professional Engineer Costs		
	< 25 components.	12	10 application	120
\$652 per submission x 10 = \$6,520 \$3,794 x 10 applications = \$37,940 for Professional Engineer Costs				
Submit modification to application for production safety system with > 125 components.	13	122 modifications	1,586	
	\$605 per submission x 122 = \$73,810			

		\$15,176 x 122 applications = \$1,851,472 for Professional Engineer Costs		
	25 – 125 components.	10	431 modifications	4,310
		\$217 per submission x 431 = \$93,527 \$7,588 x 431 applications = \$3,270,428 for Professional Engineer Costs		
	< 25 components.	7	323 modifications	2,261
		\$92 per submission x 323 = \$29,716 \$1,897 x 323 applications = \$612,731 for Professional Engineer Costs		
842(b)	Your application must also include all required certification(s) [i.e., hazards analysis, etc.,] that the designs for mechanical and electrical systems were reviewed, approved, and stamped by registered professional engineer. [NOTE: Upon promulgation, these certification production safety systems requirements will be consolidated into the application hour burden for the specific components]	6	32 certifications	192
842(d)	Submit a certification letter within 90-days after production that the as-built diagrams, piping, and instrumentation diagrams are on file, certified correct, and stamped by a registered professional engineer; submit all the as-built diagrams.	6	32 letters	208
		½		
842(e)	Maintain records pertaining to approved design and installation features either the onshore field office, readily available offshore, or location available to BSEE; make available to BSEE upon request and retain for the life of the facility.	½	32 records	16
Subtotal			987 responses	8,795 hours
			\$6,113,696 non-hour cost burdens	
Additional Production System Requirements				
851(a)(2)	Request approval to continue using uncoded pressure and fired vessels.	2	1 request	2
851(b); 852(a)(2), (3); 858(b); 865(b)	Maintain most current pressure-recorder information at location available to BSEE for as long as information is valid.	35	658 records	23,030
851(c)(2)	Request approval for activation limits set less than 5 psi.	1	10 requests	10
852(c)(1)	Request approval to vent to some other location.	1	10 requests	10
852(c)(2)	Request a different sized and upstream location of the PSV.	1	6 request	6
852(e)(1)	Review manufacturer's Design Methodology Verification Report and IVA's certificate to ensure compliance.	1	10 reviews	10
852(e)(4)	Submit required manufacturer's design specifications for unbonded flexible pipe.	Burden is covered by the application requirement in § 250.842.		0
852(e)(4)	Submit statement/certification for: alternate quality management system, exposure functionality; pipe is suitable and manufacturer has complied with IVA; suitable firefighting foam per original manufacturer specifications;	Not considered IC under 5 CFR 1320.3(h)(1).		0

	make documentation accessible to BSEE.			
855(a)	Uniquely identify all EDS stations. [NOTE: while this is considered a usual and customary business practice, not all companies have done this correctly. The burden listed is only for those who have new floating facilities.]	8	4 floating facilities	32
855(b)	Maintain ESD schematic listing control function of all safety devices on the platform, field office closest to facility, or at location conveniently available to BSEE for the life of the facility.	18	650 listings	11,700
858(a)(3)	Request approval to use different procedure for gas-well gas affected.	1	1 request	1
859(a)(3), (4)	Post diagram of firefighting system; furnish evidence firefighting system suitable for operations in subfreezing climates.	8	18 postings	144
859(a)(5)	Obtain approval before installing any firefighting equipment.	Burden is covered by the application requirement in § 250.842.		0
859(c); 860(b), (c); related NTL(s)	Request approval to use a chemical-only fire system in lieu of a water system (including extensions up to 7 days of your approved request) by submitting, including but not limited to, submittal of justification and risk assessment (and all relevant information listed in the table of this section).	39	23 requests	897
860(d)	Change(s) made after approval rec'd re 860(b) - document change; maintain the revised version at facility or closest field office for BSEE review/inspection; submit new request w/updated risk assessment for approval; maintain for life of facility.	½	14 changes	7
861(b)	Annually conduct inspection of foam concentrates and tanks; make documentation of foam available to BSEE.	2	500 submittals	1,000
	Send foam concentrate sample(s) to authorized representative for quality condition testing.	\$418 per sample x 500 samples = \$209,000.		
864	Maintain erosion control program records for 2 years; make available to BSEE upon request.	21	645 records	13,545
867(a)	Request approval of safety system/devices associated with temporary quarters prior to installation.	6	1 request	6
867(b)	Submit supporting information/ documentation if required by BSEE to install a temporary firewater system.	1	1 request	1
867(c)	Request approval to use temporary equipment for well testing/clean-up.	1	300 requests	300
867(d)	Request approval for temporary generators that would require a change to the electrical one-line diagram (submitted in § 250.842(a)).	Burden currently covered under 1014-0003.		0
869(f)	Label all pneumatic control panels and computer based control stations according to API RP 14C nomenclature.	Not considered IC under 5 CFR 1320.3(b)(2).		0
870(a)	Document PSL on your field test records w/delay greater than 45 seconds.	½	6 records	3
874(g)(3)	Submit request with alternative plan ensuring subsea shutdown capability.	2	5 requests	10
874(h)(2)	Request approval to continue to inject w/loss of communication.	1	5 requests	5

876	Document and retain, for at least 5 years, all tube-type heater information / requirements; make available to BSEE upon request. Have qualified 3rd party remove and inspect, repair or replace fire tube.	1	300 documents	300
		\$15,000 x 1,500 inspections / once every 5 years = 300 inspections = \$4,500,000		
Subtotal			3,168 responses	51,019 hours
			\$4,709,000 non-hour cost burdens	
Safety Device Testing				
880(a)(3)	Notify BSEE and receive approval before performing modifications to existing subsea infrastructure.	½	20 requests	10
880(d)(1)	Request approval for a well that is completed and disconnected from monitoring capability to exceed more than 24 months.	1	1 request	1
Subtotal			21 response	11 hour
Records and Training				
890(a), (b)	Maintain records for 2 years on subsurface and surface safety devices to include, but limited to, status and history of each device; installation date and details, inspection, testing, repair, removal, adjustments, reinstallation, etc.; at field office nearest facility AND a secure onshore location; make records available to BSEE.	48	658 records	31,584
890(c)	Submit annually a contact list (w/all required information) for all OCS operated facilities or submit when revised.	½	1,000 annual lists	550
		½	100 revised lists	
Subtotal			1,758 responses	32,134 hours
			7,097 Responses	93,385 Hours
Total Burden Hours			\$10,912,696 Non-Hour Cost Burdens	

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

The average respondent cost is \$126/hour (rounded). This cost is broken out in the following table using the Society of Petroleum Engineers Salary Survey. See SPE.org website:

<http://www.spe.org/industry/docs/2017-Salary-Survey-Highlight-Report.pdf>

Position	Base Pay Hourly Rate (\$/hr)	Hourly Rate including Benefits (1.4* x \$/hr)	Percent of time spent on collection	Weighted Average (\$/hour/ rounded)
Technical	\$76.69	\$107.36	12%	\$12.88
Engineers - Production	\$90.33	\$126.46	63%	\$79.67
Geologist	\$94.80	\$132.72	25%	\$33.18
Weighted Average (\$/hour)				\$126

*A multiplier of 1.4 (as implied by BLS news release USDL-18-0451, MARCH 20, 2018 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

Based on a cost factor of \$126 per hour, we estimate the hour burden as a dollar equivalent to industry is \$11,766,510 ($\$126 \times 93,385 \text{ hours} = \$11,766,510$).

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

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

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

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

This ICR includes 19 non-hour cost burdens totaling \$10,912,696

In § 250.842 there are 10 cost recovery fees totaling \$250,069; as well as 6 non-hour cost burdens totaling \$5,863,627 for Professional Engineering (PE) costs. BSEE is using a loaded 2017 Society of Petroleum Engineer Salary Survey hourly rate of \$126.47 for a Production Engineer to estimate the cost savings for § 250.842 (<http://www.spe.org/industry/docs/2017-Salary-Survey-Highlight-Report.pdf>). Non-hour costs that were previously included in the final rulemaking 1014-AA10 (81 FR 61834) are included first in the bullet points below. Also included in the final rulemaking 1014-AA10, but inadvertently omitted from the Paperwork Reduction Act burden estimate were non-hour cost burdens associated with PE Costs. The PE costs that were inadvertently left out of are shown in bold at the end of each bullet below. The final rulemaking 1014-AA37 did not change paperwork burden requirements for § 250.842. All of the non-hour cost burdens for § 250.842 are as follows:

- Submit application for a production safety system with > 125 components - \$5,426 per submission; \$14,280 per offshore visit; and \$7,426 per shipyard visit (**240 hours x \$126.47/hour = \$30,352 x 1 application = \$30,352 (PE)**).
- Submit application for a production safety system with 25 – 125 components - \$1,314 per submission; \$8,967 per offshore visit; and \$5,141 per shipyard visit (**120 hours x \$126.47/hour = \$15,176 x 4 applications = \$60,704 (PE)**).
- Submit application for a production safety system with < 25 components - \$652 per submission (**30**

hours x \$126.47 = \$3,794 x 10 applications = \$37,940 (PE)).

- Submit modification to application for production safety system with > 125 components - \$605 per submission (**120 hours x \$126.47/hour = \$15,176 x 122 applications = \$1,851,472 (PE))**).
- Submit modification to application for production safety system with 25 – 125 components - \$217 per submission (**60 hours x \$126.47/hour = \$7,588 x 431 applications = \$3,270,428 (PE))**).
- Submit modification to application for production safety system with < 25 components - \$92 per submission (**15 hours x \$126.47 = \$1,897 x 323 applications = \$612,731 (PE))**).

In §§ 250.801(c) and 250.802(c)(1) there is a new non-hour cost for 3rd party review for various statements throughout the subpart totaling \$90,000.

In § 250.861(b) there is a new non-hour cost for 3rd party testing of foam concentrate for quality condition totaling \$209,000.

In § 250.876 there is a new non-hour cost for 3rd party inspections of fire tubes totaling \$4,500,000.

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

The average government cost is \$75/hour (rounded). This cost is broken out in the below table using the Office of Personnel Management salary data for the REST OF THE UNITED STATES (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/>).

Position	Grade	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.6* x \$/hour)	Percent of time spent on collection	Weighted Average (\$/hour rounded)
Clerical	GS-7/5	\$22.46	\$35.94	10%	\$3.60
Petroleum Engineer	GS-13/5	\$47.38	\$75.81	70%	\$53.07
Supv. Petroleum Engineer	GS-14/5	\$55.99	\$89.58	20%	\$17.92
Weighted Average (\$/hour)					\$75

*A multiplier of 1.6 (as implied by BLS news release USDL-18-0451, MARCH 20, 2018 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

To analyze and review the information required by subpart H, we estimate the Government will spend an average of approximately .5 hour for each hour spent by the respondents for a total of 46,693 hours.

Based on a cost factor of \$75 per hour, the cost to the Government is \$3,501,975 (93,385 hours x .5 hour = 46,693 x \$75 = \$3,501,975).

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

We are revising this ICR to include the changes due to rulemaking. However, a large part of the burden is an extension of current regulatory/condition of approval requirements, NTL procedures and, are therefore, not actually new requirements.

Current subpart H regulations have 95,997 hours approved. This ICR requests a total of 93,385 burden hours; resulting in an adjustment decrease of -2,670 and of program increase of 58 burden hours.

The current OMB approved non-hour cost burden for subpart H is \$5,582,481 (cost recovery fees). In this submission, we are requesting a program adjustment of \$5,790,215 due to new non-hour cost burdens associated with PE Costs inadvertently omitted from final rulemaking 1014-AA10 (81 FR 61834). Also, in this submission, we are requesting a program change of -\$460,000. This results in a total of \$10,912,696 non-hour cost burdens.

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.

BSEE will not tabulate or publish the data.

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

BSEE will display the OMB control number and approval expiration date appropriately (§ 250.199).

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

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