

**Center for Regulatory Effectiveness (“CRE”) Comments on
Information Collection Request (“ICR”): Geological and Geophysical
Explorations of the Outer Continental Shelf:
ICR 1010–0048,
<http://www.gpo.gov/fdsys/pkg/FR-2014-12-17/pdf/2014-29564.pdf> .
Comments filed with the Desk Officer for the Department of the
Interior at OMB– OIRA at
submission@omb.eop.gov, and with
BOEM Information Collection Clearance Officer, Bureau of Ocean
Energy Management, boemcmts@gmail.com , on
January 16, 2015.**

This requested ICR applies to offshore oil and gas geophysical activities (“G&G”) including seismic air guns. CRE recently filed comments on BOEM ICR 1010-0151, which also applies to G&G including seismic. The two ICRs raise many of the same issues. Consequently, CRE incorporates by reference its comments on BOEM ICR 1010-0151.¹

CRE also incorporates by reference CRE’s previous comments on ICR 1010-1048.²

In particular,

- The U.S. National Marine Fisheries Service is cooperating with BOEM in developing these new monitoring requirements, which both Agencies refer to as the Long Term Monitoring Plan (“LTMP”). The requested ICR 1010-0048 does not cover and would not authorize any information collections in the LTMP.
- NMFS is developing new marine mammal Take regulations for oil and gas in the Gulf of Mexico. The requested ICR 1010-0048 does not cover and would not authorize any information collections in these not-yet proposed Take regulations
- OMB/OIRA should impose Terms of Clearance on ICR 1010-0048. The terms of Clearance should state that this ICR does not cover and does not authorize any information collections in the LTMP. The Terms of Clearance should also state that this ICR does not cover and does not authorize any information collections in the Gulf of

¹ CRE’s comments on BOEM ICR 1010-0151 are available at <http://www.thecre.com/forum13/?p=1885> . These comments are incorporated by reference into CRE’s comments on BOEM ICR 1010-1048.

² CRE’s previous comments on BOEM ICR 1010-1048 are available at http://www.thecre.com/pdf/20110901_ipdicrcomments250.pdf .

These comments are incorporated by reference into CRE’s current comments on BOEM ICR 1010-1048.

Mexico marine mammal Take regulations that NMFS is developing for oil and gas at BOEM's request. OMB/OIRA imposed similar terms of clearance on a related BSEE ICR.³

We propose the following language in OMB/OIRA's terms of clearance for ICR 1010-0048:

“Terms of Clearance: The public will be given the opportunity to comment on substantive modifications made to any information collections as a result of changes to NTL 2007-G02 and 30 CFR 250, subpart B regulations, including but not limited to any Long term Monitoring Plan (see 79 FR 66402, <http://www.gpo.gov/fdsys/pkg/FR-2014-11-07/html/2014-26520.htm> .”

We thank you for the opportunity to submit these comments. Please communicate with Scott Slaughter, Center for Regulatory Effectiveness, 1601 Connecticut Ave, NW, Suite 500, Washington, D.C. 20009, 202/265-2383 or 301/706-1012 (mobile) regarding these comments.

The Center for Regulatory Effectiveness
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³ http://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=201202-1014-004 .