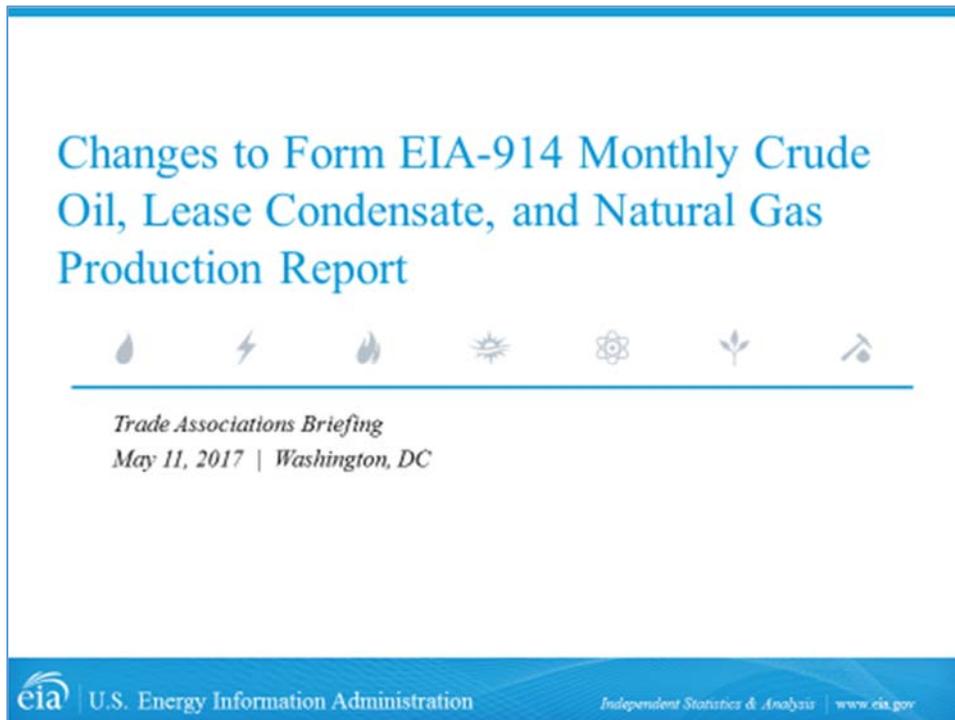


Comments from representatives from petroleum trade industry associations and responses from the U.S. Energy Information Administration (EIA).

May 11, 2017 EIA management and staff met with petroleum trade industry associations' representatives from the American Petroleum Institute (API), Independent Petroleum Association of America (IPAA), and Natural Gas Supply Association (NGSA). EIA staff provided a PowerPoint presentation, shown below, to brief the industry representatives on the proposed changes to Form EIA-914.



Overview

- Current Form Review
- Proposed changes
 - Title
 - Separating Other States
 - Section 5: Stabilizer Data
- Value in Changes
- Next Steps in OMB Process
- Questions



Current Form Review

- 5 Sections: Operational changes, natural gas production, crude oil & lease condensate production, API gravity, overall comments
- Sample size has decreased from 430 operators in 2014 down to 360 today
- 19.22% submit via PDF, 80.77% submit using webform for February 2017 campaign



Proposed Changes

- Title change – from “Monthly Crude Oil, Lease Condensate, and Natural Gas Production Report,” to “Monthly Crude Oil and Lease Condensate, and Natural Gas Production Report”
- Sections 2, 3, 4, and 5 will separate Alabama, Federal Offshore Pacific, Michigan, Mississippi, and Virginia from the “Other States” group
- New Section 5 – collects state-level volumes of crude oil and lease condensate and natural gas going in and out of stabilizer units



Value of Changes for EIA-914

- Title change is more clear – has crude oil and lease condensate together, and natural gas separate, as should be reported
- Separating 5 states/areas from “Other States” group
 - Makes reporting easier for operators in those states
 - Reduces “Other States” oil production by ~75% and gas production by ~80%
 - Separating VA, AL, and FP adds no operators; MI adds 5 and MS adds 4
- Section 5: Stabilizer Data
 - Accounts for natural gas and NGLs coming from oil stream
 - Only account for these products coming from gas stream currently



Next Steps in OMB Process

- 60-Day Comment Period (4/5/17 – 6/5/17) – add public comments and responses to Supporting Statement section
- Conduct cognitive testing with current respondents
- Make any necessary changes to Form EIA-914 and/or the processing of forms, and prepare OMB package for 30-Day Comment Period
- Survey Development Team and General Counsel review package
- 30-Day Comment Period FRN published
- OMB reviews & approves Form EIA-914 – launched by 12/1/17



Questions?



In response to the presentation, the industry representatives at the meeting provided the following oral comment.

“The EIA-914 instructions are not clear on reporting post stabilized volumes. Where in the production process does EIA want respondents to report post-stabilized crude oil and condensate production volumes? Define stabilizer.”

Industry representatives also orally requested an extension to the 60 day comment period allowing them to craft a formal response to the proposed changes on Form EIA-914.

May 16, 2017 EIA emailed representatives from API, IPAA and NGSA notifying them that the 60-day comment period had been extended to June 30, 2017.

Reply Reply All Forward IM

Tue 5/16/2017 10:00 AM

 Biercevicz, Jessica

Form EIA-914 Changes Update

To 'coronadom@api.org'; 'sginsberg@ipaa.org'; 'Peri.Ulrey@NGSA.org'; 'hague@api.org'

Cc  Long, Gary;  Little, Jeffrey;  Murray, Patrick

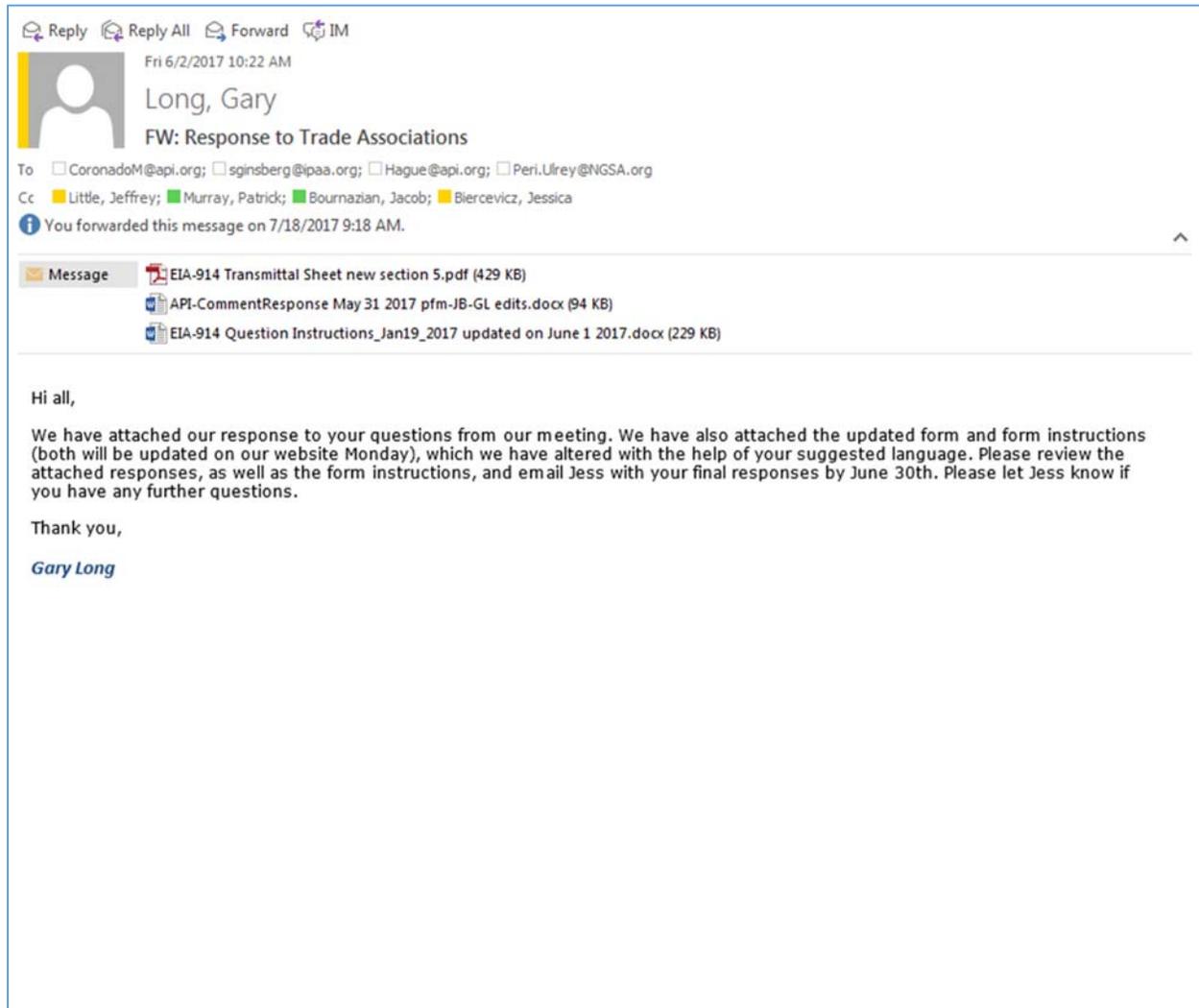
Good morning,

We found out that we cannot publish another Federal Register Notice, but we can sent out a supplemental document, and have the comment period extended to June 30, 2017. We are working on the supplemental document now, and are trying to have it completed this week. We will send this document to all current respondents, subscribers to the relevant EIA publications, and to you. This document will include our extension for the comment period. We will also be updating the form instructions and the PDF version of the proposed form on the EIA website. Please let me know if you have any questions or feedback.

Thank you,

 **Jessica Biercevicz** | Survey Statistician
Office of Oil, Gas, and Coal Supply Statistics
U.S. Energy Information Administration
O: 202-586-4299

June 2, 2017 EIA emailed trade association representatives from API, IPAA, and NGSa the definition of stabilizers.



On June 2, 2017, EIA responded, by email, to the comment it received orally on May 11, 2017 from the trade association representatives in an attached Word file titled “API-CommentResponse May 31 2017 pfm-JB-GL edits.docx” that is shown below:

U.S. Energy Information Administration’s Response to Comments Received from Meeting with Representatives from API, IPAA, and NGSa on May 11, 2017

COMMENT:

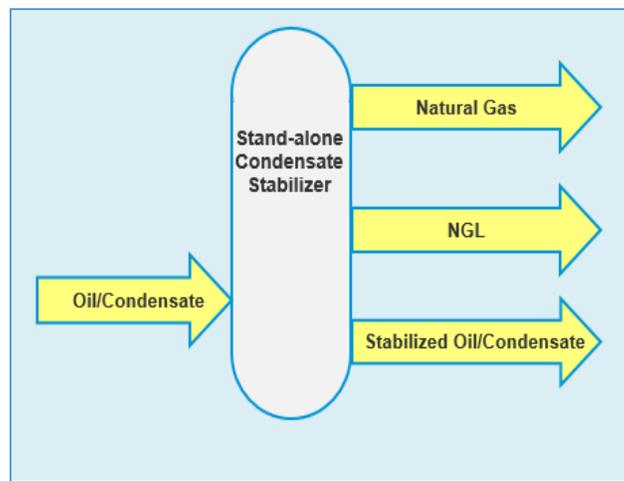
The EIA-914 instructions are not clear on reporting post stabilized volumes. Where in the production process does EIA want respondents to report post-stabilized crude oil and condensate production volumes? Define “stabilizer.”

RESPONSE:

Thank you for your comments in response to EIA’s proposal to collect information on crude oil and condensate stabilizer activity in a new Section 5 on Form EIA-914. EIA seeks to collect production data from only Stand-alone stabilizers. A Stand-alone stabilizer is a facility or oilfield equipment that processes crude oil and lease condensate input streams to remove the lighter hydrocarbons to meet operational, regulatory, and customer specifications. It is not located on-site with, nor operated as part of, a natural gas processing plant.

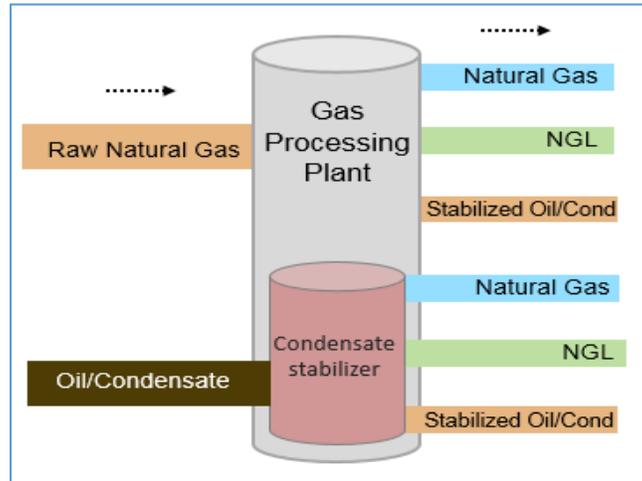
EIA groups stabilizers into two categories; Stand-alone stabilizers and stabilizers associated with a gas plant. **ONLY Stand-alone stabilizer volumes are to be reported on Form EIA-914.** A simple way to differentiate the two types of facilities are by their inlet streams.

The graphic below shows a Stand-alone crude oil and condensate stabilizer. A Stand-alone stabilizer processes an oil/condensate inlet stream and produces 3 possible outlet streams: natural gas, natural gas liquids (NGL), and post-stabilized oil/condensate.”



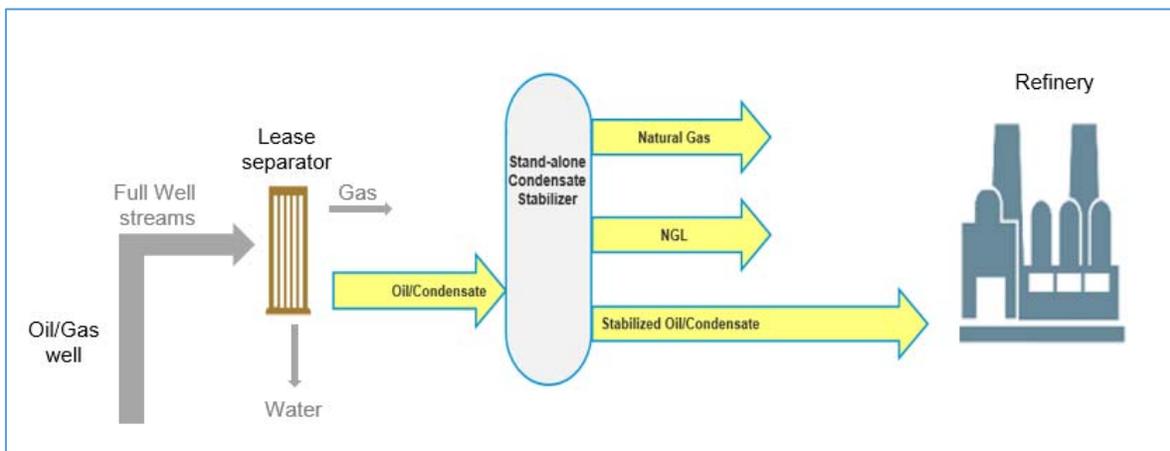
Stabilizer with Gas Processing Plant

A gas processing plant that has a stabilizer on location will have two inlet streams; one for the oil/condensate and another for raw natural gas. See graphic below. This type of stabilizer also produces 3 possible outlet streams: natural gas, NGLs, and post-stabilized oil/condensate.



Stand-alone stabilizer

The graphic below shows where the Stand-alone stabilizer is located in the flow of oil. Oil/condensate is produced from wells where it is separated from water and gas in a simple lease separator or heater treater. If, after lease separation, the light hydrocarbon content of the oil/condensate exceeds the limits of the purchaser, or does not meet operational or regulatory requirements, then stabilization is required. After stabilization, the oil can be sold and shipped to a refinery.



The definition of a Stand-alone stabilizer was added to the form instructions. The definition now reads –

Stand-alone Stabilizer: Oilfield equipment or facility that processes crude oil and lease condensate input streams to remove the lighter hydrocarbons to meet operational, regulatory, and customer specifications. It is not located on-site with, nor operated as part of, a natural gas processing plant.

EIA is proposing to add Part 5 to Form EIA-914 to collect four new data elements from operators of Stand-alone stabilizers: volume of oil and condensate as inputs to a stabilizer, the outlet volume of stabilized oil; outlet volume of natural gas, and the outlet volume of natural gas liquids (NGL).

June 30, 2017 EIA received, by email, written comments from the trade associations as shown below:



June 30, 2017

Ms. Jessica Biercevicz
U.S. Department of Energy
Energy Information Administration
Forrestal Building
1000 Independence Avenue SW
Washington, DC 20585

Dear Ms. Biercevicz:

American Petroleum Institute (API), the American Exploration & Production Council (“AXPC”), Independent Petroleum Association of America (“IPAA”), the Natural Gas Supply Association (“NGSA”), US Oil & Gas Association (“USOGA”), and the Council of Petroleum Accountants Societies (COPAS) (collectively, “Industry Coalition”) respectfully submit comments in response to the Federal Register notice issued on April 4, 2017 [FR Doc. 2017-06501] (“April 4 Notice”). In the April 4 Notice, the Energy Information Administration (EIA) requested industry comments on its proposal to expand its crude oil, lease condensate, and natural gas data collection to include five additional states/areas; collect crude oil and condensate stabilizer data; increase commentary details through multiple default-options as well as to provide a three-year extension of the EIA Form EIA-914 “Monthly Crude Oil, Lease Condensate, and Natural Gas Production Report.” Given that members of our organizations account for a large portion of the companies that are responsible for gathering and reporting production data to EIA, we appreciate the opportunity to comment on EIA’s proposal.

The Department of Energy (DOE) data collection provides tremendous value to the marketplace and the Industry Coalition values DOE’s goal of collecting useful volume data on production. As discussed in greater detail below, however, given the varying types of field operations throughout the United States, we do not believe the additional data collection on

crude oil and lease condensate stabilizer data in “Section 5: Monthly Input and Output to Stand- Alone Stabilizer” of Form EIA-914 can be uniformly collected in a way that would be useful to EIA or other parties. In addition, the Coalition has concerns about the added measurement purchase and installment costs of devices at all the required points, along with added administrative costs that may be incurred to comply with the requirements of Section 5. Also, because the proposed reporting requirements would expand the number of states and geographical areas as well as the requirement for respondents to include detailed comments (Sections 2, 3 and 4), industry will need additional time to implement these changes in addition to more time prior to submitting the monthly data.

Over the past several years, multiple regulatory and non-regulatory state and federal government agencies have made numerous proposals to expand reporting requirements on crude oil and natural gas producers, which has led to countless hours assessing such proposals and continuous efforts to develop ways to expand our data collection processes. For this reason, we ask EIA to be mindful in balancing the burden of additional reporting and the added value this information would bring, especially in light of the DOE’s ongoing effort to evaluate regulations and to reduce burdens on the regulated community.¹ Given DOE’s recent request for comment on this effort, we believe it is counterproductive at this time to continue with a request for additional data collection, yielding data of questionable accuracy and value, when this data collection could run counter to the directives set forth in the Executive Order. For this reason, we are also providing information on the additional resources required to compile this data in addition to the relative value we believe it would provide.

We do not believe the current survey questions in this proposal to separate crude oil and lease condensate stabilizer activities will provide data that can be relied upon by EIA or other entities. As currently written, the instructions in “Section 5: Monthly Input and Output to Stand- Alone Stabilizer” do not align with industry operations or terminology, which will lead to various interpretations by respondents if published and result in inconsistent and unreliable information. For example, the definition of a stand-alone stabilizer, as provided by EIA, does not accurately describe what operators are using in the field. The treatment and processing of crude oil, natural gas and other product streams can occur at many points along the supply chain for various reasons. However, those processes often are not referred to as stabilization, nor are the various processing units commonly referred to as stabilizers. Operators use different types of equipment to distill or process crude oil and natural gas into the products they need for different markets, storage or transportation requirements. An operator may use a distillation unit that may have both oil and gas streams that enter the facility. The natural gas goes through an additional stage of separation, and any condensate recovered is mixed with crude condensate from the lease and then introduced into the unit. The measurement of the condensate entering the facility occurs prior to the mixing of condensate recovered from the gas stream. The inlet volume at the stabilizer/distillation unit itself is different from the measured volume into the facility. However, EIA does not provide a distinction in its proposal given the varying types of operations that occur or consider where measurement may occur.

There appears to be a large disconnect between what EIA is seeking from producers in this new data collection expansion and the way the industry currently operates. EIA's supplementary document to the Trade Associations to clarify the requested reporting instructions of post-stabilized volumes stated that EIA wants operators of stand-alone stabilizers to provide the data. Based on the "Required Respondents" section of the Form EIA-914 Transmittal Instructions, however, the well operators are the only ones that are required to

¹ Initially set forth in Executive Order 13771, issued on January 30, 2017, Federal agencies were tasked with identifying existing regulations, paperwork requirements, and other regulatory obligations that can be modified or repealed to achieve meaningful burden reduction while continuing to achieve an agency's statutory obligations. DOE published its request for information in the Federal Register on May 30, 2017, asking for comments and information to be submitted by July 14.

submit the Form EIA-914 data. For this reason, if the well operator and the operator of the stand-alone stabilizer are not affiliated, there will not be a reporting-entity. It also does not state what is written in the supplementary document that any (implied) operator including unaffiliated Midstream operators must submit this data. Once the oil or natural gas is produced, it is often sold at the wellhead, meaning any changes to the product, including treatment and processing, would not be known by the well operator. These operations are now considered to be in the Midstream segment of the supply chain and cannot be captured in this form. Therefore, we recommend that EIA remove Section 5 from this extension of the Form EIA-914 survey.

Sections 2 through 4 of EIA's proposal will now require more detailed responses and explanation through multiple default-option comments on state-by-state monthly production volumes of natural gas, crude oil and condensate, including by API gravity. Providing more detail will require survey respondents to do extensive research each month since the requested information is not readily available and is susceptible to varying interpretations resulting in potentially inconsistent responses. Respondents have experienced a trend of increased post-report inquiries from EIA staff. Many of these inquiries pertain to only minor changes in monthly data (<10% increase or decrease month-to-month). These increasingly frequent inquiries create additional reporting burden to industry respondents. Industry respondents are concerned that the proposed modification of the comment drop-down menu will further the trend of reporting burden.² It is unclear what benefit is gained by attempting to explain minimal differences in monthly data, and we would request that EIA explain its threshold level for minor monthly data changes. Industry requests that commentary on month-to-month data variations be limited to changes greater than 10 percent. EIA should also acknowledge that commentary is voluntary, not a requirement, and serves to provide context for significant fluctuations as available and appropriate. Respondents should not be requested to provide economic information (e.g., "increase because of improved well economics"). Respondents to Form EIA-914 are providing quantity data, not monetary value data. For these reasons, we

believe the EIA should revise its proposal to eliminate the addition of the comment box drop down menus.

However, if this requirement is not eliminated, respondents need at least 60 days after the end of the month rather than the current 40 days now provided in order to ensure accuracy of the submitted data to minimize the need for resubmissions.

Yet another reason to extend EIA's reporting deadline 60 days after the end of the report month is the additional preparation time needed to separately report the five new states/geographical areas from the "other" category added to the current list of separately reported 17 states' crude oil, lease condensate, and natural gas monthly production volumes. The expanded reporting requirements to new and existing producers will require additional accounting and computer system changes to ensure that producers are able to submit reliable and accurate data. In addition to systems modifications, companies will have to provide training to ensure that personnel and contractors fully understand the new reporting requirements and reporting deadlines. For this reason, we estimate that we will need at least six additional months from the date that EIA obtains Office of Management and Budget (OMB) approval.

We do not agree with the statement made in the April 4 Notice that "Stabilizers lower the Reid [sic] Vapor Pressure (RVP) of the crude oil and make it safe to transport and store."³ We are

² Even without this additional reporting, some producers indicate they already spend more time compiling and responding to questions on the Form EIA-914 report than any other state and federal reports that they submit.

³ The correct term is Reid Vapor Pressure.

simply unaware of any scientific studies that support a conclusion that vapor pressure plays a role in the safety of class 3 flammable materials in transport.

Finally, the EIA proposes to permanently revise the confidentiality pledge to Form EIA-914 respondents as required by provisions of the Federal Cybersecurity Enhancement Act of 2015 (Pub. L. 114-11, Division N, Title II, Subtitle B, Sec. 223). We appreciate that EIA recognizes the importance of maintaining a high level of confidentiality on the reported production information. Maintaining a safe harbor is essential to mitigating regulatory compliance risk for participating in the monthly production survey. Such confidentiality is necessary for participating operators in the monthly production survey due to the sensitive nature of production-related information in a competitive crude oil and natural gas market. For this reason, we strongly support the collection of data under the Confidential Information Protection and Statistical Efficiency Act of 2002 (CIPSEA) and required by the Federal Cybersecurity Enhancement Act of 2015.

Thank you for the opportunity to comment on the proposed changes to the Form EIA-914 survey. The Industry Coalition strongly urges EIA to remove "Section 5: Monthly Input and Output to Stand-Alone Stabilizer" from the survey extension at this time due to its lack of clarity and misalignment with industry operations and terminology, which will result in

generating confusion and unreliable data. Furthermore, we urge EIA to reconsider its proposal to revise Sections 2 through 4 of the survey requesting additional reporting of detailed comments on the state-by-state monthly production volumes of natural gas, crude oil and lease condensate, including by API gravity, as these will require extensive additional research and time by survey respondents to complete prior to the data submission. If the revisions to Sections 2 through 4 and the separation of five states and geographical areas from the "other" category are retained in the survey, we strongly urge EIA to increase the reporting deadline to 60 days after the end of the report month and provide a six-month lead time on implementation of the data collection to allow companies sufficient time to modify their existing accounting and reporting systems in order to provide timely and accurate data collection. Finally, we would like EIA to recognize that, while the proposed changes will impose a burden on larger publicly-traded companies, the increased burden for smaller privately-held companies could be significant given that they typically do not have large accounting and regulatory staff. For this reason, this effort should be closely examined in the context of the broader DOE review effort to reduce regulatory burden.

We look forward to working with EIA in its efforts to improving its data collection processes.

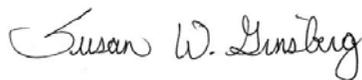
Respectfully submitted,



Erik Milito
Group Director, Upstream & Industry
Operations
American Petroleum Institute (API)
1220 L Street, N.W.
Washington, D.C. 20005
Tel: (202) 682-8000



V. Bruce Thompson
President
American Exploration & Production
Council (AXPC)
1001 Pennsylvania Avenue, N.W., Suite 7205
Washington, D.C. 20004
Tel: (202) 347-7529



Susan Ginsberg
Vice President, Crude Oil &
Natural Gas Regulatory Affairs
(COPAS)
Independent Petroleum Association
207 of America (IPAA)
80228



Trey Thee
Revenue Committee Chair
Council of Petroleum Accountants Society
445 Union Blvd., Suite
Lakewood, CO.

1201 15th Street, N.W., Suite 300
Washington, D.C. 20005
Tel: (202) 857-4722

Tel: (877) 992-6727



Peri Ulrey
Director and Chief Economist
Natural Gas Supply Association (NGSA)
1620 Eye Street N.W., Suite 700
Washington, D.C. 20005
Tel: (202) 326-9300



Alby Modiano
President
U.S. Oil & Gas Association (USOGA)
1101 K Street, N.W., Suite 425
Washington, D.C. 20005
Tel: (202) 638-4400

August 9, 2017 EIA issued a response to the trade association letter that it received on June 30, 2017. The following text is the response in its entirety.

Wed 8/9/2017 4:42 PM

 Biercevicz, Jessica

RE: Industry Coalition Comments to the Proposed Revisions to Form EIA-914-"Monthly Crude Oil, Lease Condensate, and Natural Gas Production Report"

To: Peri Ulrey

Cc: Maria M. Coronado; Susan Ginsberg; Emily Hague; Long, Gary; Little, Jeffrey; Murray, Patrick; Bournazian, Jacob

 You replied to this message on 8/14/2017 11:49 AM.

 Message  EIA Response to Trade Associations 8-8-17.docx (18 KB)

Good afternoon,

Thank you for your comments regarding the changes in the Form EIA-914 Monthly Crude Oil, Lease Condensate, and Natural Gas Production Report. Attached is EIA's response to your comments. Please let us know if you have further questions. The next step in the process will be OMB's publication of the Federal Register Notice, which will provide another 30-day public comment period.

Thank you again,

 **Jessica Biercevicz** | Survey Statistician
Office of Oil, Gas, and Coal Supply Statistics
U.S. Energy Information Administration
O: 202-586-4299

EIA Response to the April 4, 2017 Industry Coalition (6 Trade Associations) FRN Comments

Thank you for providing comments to the Federal Register Notice issued on April 4, 2017. We appreciate your willingness to participate with us to develop an efficient and improved data

collection form, the EIA-914, Monthly Crude Oil and Lease Condensate, and Natural Gas Production Report.

Addition of Section 5, Standalone Stabilizer data

EIA has modified its definition of a standalone stabilizer in the instruction document removing language related to safety. EIA defines a standalone stabilizer as oilfield equipment or a facility that processes crude oil and lease condensate input streams to remove the lighter hydrocarbons to meet operational, regulatory, and customer specifications. It is not located on-site with, nor operated as part of, a natural gas processing plant. The industry coalition comments seem to confuse a standalone stabilizer with stabilizers operated as part of a gas processing plant. Other EIA forms will collect data about stabilizer activity that are part of a gas plant's operations. Oil and gas producers do not file these other EIA forms. Additional equipment will not be required to measure volumes sent to, or output from, a standalone stabilizer. Data available from existing measurement, tracking, and accounting processes/systems are sufficient. EIA will work with any producer concerned about this to determine how best to satisfy the reporting requirement without the need to purchase equipment. Oil that is sold at the well head or lease and later stabilized does not have to be reported on Form EIA-914 by the producer. As noted in the Industry Coalition comments, this is considered to be in the "Midstream segment" and would likely be reported on other EIA forms.

Pulling 5 States Out of the Other States Group

Companies have told EIA that it is easier to report individual states than to report data for aggregated states. Pulling 5 of the larger states out of the Other States Group also makes it easier for the companies to check and validate reported data if there is a need for follow up. Also, most companies will have production in only a few of the remaining states in the Other States group making validation of the Other States group easier as well. EIA, as it has in the past, will work with companies that need extra time to adjust their internal reporting systems.

Additional Dropdown Comments in Sections 2 and 3

EIA encourages producers to include comments on the form to explain significant changes from the previous month. For Sections 2 and 3 a dropdown list is available with the most common comments provided by companies in the past. A company can select as many of these comments as necessary by just clicking on them. Written comments can also be entered along with selected comments or instead of the dropdown comments. While comments in Sections 2 and 3 are not required, including a dropdown list of explanatory comments on the form will greatly reduce reporting burden by reducing the number of follow up phone calls and emails to respondents. This feature was added to reduce burden by making it easier for companies to explain changes in their data. Comments in sections 4 and 5 are also not required, but respondents are encouraged to leave a comment to explain significant changes from the previous month to avoid follow up phone calls and emails. EIA does not request economic data like costs or prices, but does provide a dropdown comment that a respondent may select to indicate that a change in production in a state is the result of improved or declining economics. The vast majority of companies comply with the current reporting deadline of 40 days after the production month. EIA works with the few that have difficulties meeting the deadline to get their reports filed in a reasonable time, so we see no need to extend the deadline.

Burden for Smaller Privately-Held Companies

The Form EIA-914 sample will comprise no more than 500 of the largest producers out of over 13,000 active operators of crude oil and natural gas wells in the Lower 48. EIA conducts the survey using a cut-off sample of operators to help ensure that the impact, if any, on smaller entities is minimized.

August 11, 2017 Susan Ginsberg from the Independent Petroleum Association of America (IPAA) sent an email to Nancy Johnson of Department of Energy (DOE), Office of Fossil Energy asking who else within the DOE, outside of EIA, is looking at the proposed changes to Form EIA-914.

From: Susan Ginsberg [<mailto:sginsberg@ipaa.org>]
Sent: Friday, August 11, 2017 5:11 PM
To: Johnson, Nancy <Nancy.Johnson@hq.doe.gov>
Subject: Question from IPAA regarding EIA Form 914

Hi, Nancy. I work with Lee Fuller, and we've met a few times. Lee suggested contacting you to find out who in your shop might be looking at EIA's proposed expansion of Form 914: Monthly Crude Oil and Lease Condensate, and Natural Gas Production Report. The most significant change proposed would be the addition of Section 5: Monthly Input and Output to Stand-Alone Stabilizer. IPAA, along with API and NGSA, met with EIA staff and noted that the definition of stabilizer was unclear; that few producers own their own stabilizers; and, therefore, EIA was unlikely to obtain sufficient information to make this additional data set useful (given the current lack of data collection from the midstream sector). I have attached a copy of our comments to EIA, along with EIA's response. IPAA also noted our concerns with Section 5 in our comments to DOE on regulatory reform.

EIA replied to our comments on Wednesday, August 9. While some of our concerns were addressed, EIA did not even mention industry's argument that Section 5 was unlikely to yield usable data, given the different ownership profiles of those owning stabilizers. I am asking if you are aware of anyone within DOE, outside of EIA, who is looking at the proposed changes. IPAA intends to provide comments to OMB.

EIA does a great job of providing important data. However, the proposed revisions to Form 914 don't appear to add value to the data currently collected. Please let me know if there's someone within DOE who would be interested in discussing this.

Thank you,
Susan Ginsberg

Susan W. Ginsberg

Vice President
Crude Oil & Natural Gas Regulatory Affairs
Independent Petroleum Association of America
www.ipaa.org / sginsberg@ipaa.org / 202.857.4728
IPAA Access Direct Blog: <http://www.ipaa.org/blog/>

IPAA represents the companies that drill 90 percent of America's onshore and offshore oil and natural gas wells.

RESPONSE: EIA met with representatives from three oil and gas upstream industry trade associations, API, IPAA, NGSA, (Trade Associations) on August 28th to address their concerns on reporting information on stabilizers (the proposed Section 5 on the EIA-914 form). No staff person from DOE's Office of Fossil Energy attended the meeting. EIA and the Trade Associations felt that a more detailed understanding of the stabilizer business/activity was needed to have an effective data collection that was beneficial to EIA and its customers while minimizing industry burden. It was mutually agreed that a joint study of stabilizers was needed to provide this increased understanding.

On September 18th EIA discussed this issue with representatives from the Trade Associations via a telephone conference. EIA informed the Trade Associations that Section 5 of the proposed

form will be withdrawn from this ICR submission to OMB. EIA agreed to work with the Trade Associations and their experts (members) to conduct research into stabilizer operations and stabilizer data quality, and meet periodically over the next year to plan and review the research. The research may involve discussions/meetings with stabilizer operators and experts identified by the Trade Associations or EIA, and possibly a one-time usability testing conducted by one of the Trade Associations or EIA.