



UNITED STATES GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548

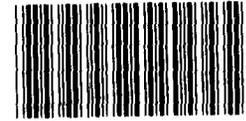
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ENERGY AND MINERALS
DIVISION

March 19, 1982

B-206772

The Honorable Jim Mattox
The Honorable Wes Watkins
The Honorable Frank Annunzio
The Honorable William M. Brodhead
The Honorable Martin Frost
The Honorable Albert Gore, Jr.
House of Representatives



117951

Subject: Effects of Increasing Filing Fees for
Noncompetitive Onshore Oil and Gas Leases
(EMD-82-67)

This report responds to your letter of February 11, 1982, which asked us to examine the Department of the Interior's recent action increasing from \$25 to \$75 the fee charged to applicants filing for noncompetitive onshore oil and gas leases. 1/ Basically, Interior raised the fee to (1) reduce casual speculator (i.e., non-industry) involvement and multiple filings in the leasing program, thereby reducing fraud potential, development delays, and its administrative burden and (2) generate additional revenues.

Due to the limited time available (it was agreed we would report on the matter by March 19), we did not perform an in-depth review of the subject. However, we were able to draw to some extent on our ongoing work dealing with industry and speculator activity on onshore oil and gas leases, on which a final report should be available later this spring. We also examined the Interior Department's analysis supporting the fee increase, spoke with Bureau of Land Management (BLM) and other Interior officials involved with its analysis, and with oil and gas leasing in general, contacted industry trade associations, and examined public comments on the proposed increase. Specifically, we considered

- Interior's basis for establishing the higher filing fee,
- the expected number of lease filings at the higher rate and its effect on revenues, and

1/The final rulemaking was made effective February 19, 1982. The filing fee will increase to \$75 for all noncompetitive leases; and for simultaneous oil and gas (SOG) leases, the rental will increase from \$1 to \$3 per acre for the 6th through the 10th years.

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--the possible impact on leasing participants--particularly speculators--and related implications for reducing fraud, development delays, and administrative burden.

We made our review in accordance with our current "Standards for Audit of Governmental Organizations, Programs, Activities, and Functions."

THE IMPACT OF HIGHER FILING FEES IS UNCERTAIN

The overall impact of the higher filing fee is uncertain. The increase very likely will result in more revenues to the Government than were obtained in the past, but probably not to the extent projected by the Interior Department. We were unable to determine in the time available the degree to which other problems the Department desires to overcome--such as the involvement of casual speculators--really are problems or whether they are best dealt with through a fee increase. In addition, the increase may have certain adverse effects that have not been fully considered, such as reducing the role of independent oil companies.

Last year's filing fee increase from \$10 to \$25 was in effect for only two drawings. Thus, conclusive data is not available on the impact of that increase on revenues and on participation by various concerned parties in noncompetitive oil and gas leasing. With the further increase to \$75, we suggest that both the Congress and the Department of the Interior closely watch the results and be prepared to take remedial action should that become appropriate.

Following is a detailed discussion of Interior's basis for raising the filing fee, and our observations on the possible effects.

INTERIOR'S BASIS FOR INCREASING THE FILING FEE

The filing fee had been \$10 for many years, but the Omnibus Budget Reconciliation Act, effective October 1, 1981, raised it to "not less than \$25." The act also authorized the Secretary of the Interior to increase the fee above \$25. The Act provided that the increase must be by regulation and subject to the provisions of the Federal Land Policy and Management Act (90 Stat. 2765) and the Independent Offices Appropriation Act (65 Stat. 290), but did not limit the fee to a recoupment of actual costs, as had been generally recognized in the past. Thus, Interior concluded that it could now use the filing fee as a means of generating revenue rather than just recovering its costs to process lease applications. 1/

1/We did not have time to consider in more detail whether Interior's interpretation is in accordance with the requirements of 90 Stat. 2765 and 65 Stat. 290.

In reaching its decision on further increasing the filing fee from \$25 to \$75 (and, concurrently, increasing the annual rental for the last 5 years of the lease), Interior cited seven objectives of the noncompetitive onshore oil and gas leasing system. Primarily, they are to

- promote orderly and timely development,
- maintain incentives for exploration, and
- maximize the direct awarding of leases to those entities intent on development.

And also to

- minimize the administrative burden of operation,
- receive revenues commensurate with the cost of operating the program as well as the fair market value of the public's resources,
- maintain low barriers of entry for small firm participation, and
- be compatible with other resource programs for minerals and multiple use.

Interior concluded that a \$75 filing fee (coupled with an increased rental) would

- reduce the total filings to about 2 to 3 million filings per year (versus 4 to 5 million projected under a \$25 fee), but still bring in increased receipts of \$150 to \$225 million a year (versus \$100 to \$125 million projected under a \$25 fee), and
- deter casual speculators and multiple filers, thereby
 - reducing fraud,
 - increasing instances of leases going directly to the developer, and
 - reducing BLM's administrative burden.

ANALYSIS OF INTERIOR'S BASIS
FOR RAISING THE FILING FEE

Interior's projections are based largely on estimates of the value of the leases to the applicants relative to their chances of winning, and a reasonable recovery by the Government

of costs incurred and value tendered. Due to the lack of available empirical data, and the subjectivity of forecasting the applicants' reactions, however, we believe there is no way to confidently predict the impact of the changes, as discussed below.

Costs related to the SOG are uncertain

Interior has not determined the actual cost of administering a SOG application but estimates that it costs about \$10. Rather than attempt to determine the actual cost, Interior considered other factors identified in the Federal Land Policy and Management Act (FLPMA) that, based on the 1981 Omnibus Budget Reconciliation Act, it believed could be considered in setting such a fee. Of the several factors identified in FLPMA, the Department focused on the monetary value of the right or privilege sought by an applicant in obtaining a lease.

There is little data available on which to value a lease

The decision to raise the filing fee to \$75 was based primarily on an October 1981 analysis by the Interior Department. A key factor in Interior's approach was determining the fair market value of all the leases in the SOG system, which Interior defined as the total amount successful applicants could get for them. Interior initially estimated this amount to be between \$90 and \$270 million annually. However, this value was increased to between \$225 and \$400 million in a regulatory impact analysis Interior prepared in January 1982. These revised dollar values were based on contacts with industry representatives, identified by an Interior official to be industry trade associations, indicating that lottery winners are often assigning their leases for about \$75 to \$100 an acre, and that about one-fourth to one-third of the leases are assigned annually. With about 2,000 to 2,667 leases being assigned annually, this suggested to Interior an overall market value of \$225 to \$400 million.

We were unable to substantiate the \$75 to \$100 per-acre price cited by Interior as the value for which leases are being assigned. It is possible that some leases may be assigned at that amount but without supporting factual data it cannot be confirmed. This data would only be available from the parties involved on a voluntary basis.

The reaction of the various SOG participants cannot be confidently predicted

In attempting to forecast the extent of participation by a potential SOG applicant under a \$75 fee, Interior used what it

calls a "general premise in playing lotteries," which presumes that "one enters only if the expected pay-off, i.e., the value of the prize divided by the number of entries, exceeds the certain cost of entering." Using this premise, Interior concluded that if the cost of entering is \$75 per application and the value of the prize is \$225 million, it is expected that 3 million entries would occur in a true lottery. However, since in this case the SOG precludes multiple entries, Interior acknowledged that the number of entries could be considerably less, although it felt that less than 1 million entries was unlikely.

This approach assumes that the typical lottery applicant--including a casual speculator unversed in geology or in the SOG program--follows such a rationale in deciding whether to apply. However, unlike a true lottery, the value of the prize, and the likelihood or "odds" of winning, are essentially unknown. Even in the competitive segment of the onshore system, where there is generally much greater geologic knowledge and the tracts are valued by the U.S. Geological Survey (USGS) as well as industry bidders, the bids tend to cover a wide range and often have little relationship to the USGS valuation. Thus the assumptions used by Interior in deriving the expected number of entries with the \$75 rate may not be entirely appropriate.

REVENUE PROJECTIONS ARE UNCERTAIN

With the projections discussed above also forming the basis for revenue estimates, we believe that the revenue estimates are equally uncertain.

Interior is projecting that annual filings will amount to at least 2 million with a \$75 filing fee and that revenues will therefore be at least \$150 million (in contrast to revenues of about \$47 million at a \$10 fee in 1981). Interior projects the upper range of possible filings at 3 million, with revenues of \$225 million. However we see nothing in Interior's analysis that convinces one that filings cannot fall below 2 million. Still, on balance, it is likely that revenues derived with a \$75 fee will be more than under either a \$10 or \$25 fee.

The \$25 fee may have had a greater impact than initially thought

There had been only one drawing under the \$25 fee when Interior did its study, and it felt the results were inconclusive. Since then, we were able to obtain information on the second \$25 drawing, which would tend to suggest a definite decline in filings.

Although the number of land parcels offered during the November 1981 and January 1982 drawings increased to record

levels after the filing fee was raised from \$10 to \$25, the number of lease filings received decreased substantially. These were the only drawings to use the \$25 filing fee before it was increased to \$75.

Within the short time frame for doing our work, we were not able to do any trend analysis of parcels offered and filings received prior to 1981. Although information is available on the number of filings (see encs. II and III), information is not readily available, and could not be obtained in time for this report, on the number of parcels involved. We were thus limited to 1981 data, developed by Interior, on parcels and filings, except that we were able to obtain data relative to the January 1982 offer that had not been available at the time Interior prepared its regulatory impact analysis.

We found that the number of filings continued to decrease in January 1982, dropping below the level that occurred in November. In September, the last drawing with a \$10 fee, 846 parcels were offered for which over 1 million filings were received. In November, the first offer with a \$25 filing fee, the number of parcels increased by over 100, to 974, but the filings decreased by over 400,000, to 604,000. In the next--and last drawing at the \$25 filing fee--parcels offered increased again by over 200 but filings further decreased to 550,000. Thus, from the last \$10 drawing in September 1981 to the last \$25 drawing in January 1982, filings decreased by 46 percent--from 1 million to 550,000, even though the parcels offered increased by 40 percent, from 846 to 1184.

Although it is possible that other factors, such as seasonal fluctuations, may have contributed somewhat to the decline in filings, it would appear the increase from \$10 to \$25 was a major factor. It should be noted, however, that despite this significant reduction in filings, the revenue produced in November 1981 and January 1982 exceeded that for September--the highest filing in 1981--by about \$5 million and \$3 million, respectively.

Gauging the true effect of the \$25 filing fee is difficult and, of the \$75 fee, even more difficult. Projections could be based on the most recent month under the \$10 fee, or the most recent year, or trends could be forecast. Each calculation could have significantly different results. Interior estimated that there would be a minimum of 4 million filings annually under the \$25 fee (i.e., no substantial decrease in the number of filings despite the increase from \$10), which would have resulted in \$100 million in revenue. Thus, the break-even point at the \$75 fee was considered to be 1-1/3 million filings--netting the same \$100 million--and anything less would result in revenue being lost.

However, if the decline that began in November 1981 is actually attributable to the \$25 fee, then the 4 million filings may have been an optimistic projection--and about 3.5 million may have been more realistic (i.e., an average of about 575,000 filings for November 1981 and January 1982 times six drawings for the year). Assuming the worst case, that filings at the \$10 rate would not have continued to increase, we could thus expect the number of filings at \$10 to remain at 4.7 million, and those at \$25 to remain at about 3.5 million. Given that, the filings would have to stay at an annual level of about 1.17 million to realize the same revenue as that obtained at the \$25 rate, and drop below 630,000 before revenues at the \$10 rate were not achieved, as shown below.

Comparison of Filings Needed to Generate
Comparable Revenue

	<u>\$25</u>	vs.	<u>\$75</u>	<u>\$10</u>	vs.	<u>\$75</u>
Applications (million)	3.5		1.17	4.7		.63
Filing fee charge (\$)	<u>x25</u>		<u>x 75</u>	<u>x10</u>		<u>x75</u>
Gross revenues (million)	<u>\$87.5</u>		<u>\$87.7</u>	<u>\$47</u>		<u>\$47</u>

Source: GAO

The possibility of filings falling below a million should probably not be ruled out--although we believe it is unlikely. Our work suggests about 50 percent of the SOG participants are casual speculators, and only about 4 percent are major oil companies, leaving the independents' participation at about 46 percent. If (1) Interior was successful in totally eliminating all casual speculators, (2) the independent continued to file at the same dollar rate (as a representative of the Independent Petroleum Association of America (IPAA) advised us many would), and (3) major oil companies continued to file the same number of applications, filings could conceivably fall below one million, as shown below:

Approximate percent of participation	<u>\$10 Fee</u>		<u>\$75 Fee</u>	
	<u>Number of filings</u>	<u>Revenues</u>	<u>Number of filings</u>	<u>Revenues</u>
----- (millions) -----				
Speculator 50	2.33	\$23.3	-	-
Independent 46	2.15	21.5	.29	\$21.50
Major <u>4</u>	<u>.19</u>	<u>1.9</u>	<u>.19</u>	<u>14.25</u>
Total <u>100</u>	<u>4.67</u>	<u>\$46.7</u>	<u>.48</u>	<u>\$35.75</u>

Source: GAC

Although this is probably the extreme case--and not likely to happen--since not all speculators would likely be eliminated, and not all independents are that financially constrained, it probably does show the lower limits of any reasonable scenario.

INDIVIDUAL IMPACTS OF THE FILING FEE INCREASE

Interior is anticipating that the increased filing fee will reduce the participation of the casual speculator. Interior officials also recognize that some independents with limited capital may have to be more selective in filing their applications, but they anticipate that, overall, the industry will be the direct winner of more leases than in the past, thus reducing the time before a tract can be developed, and reducing the cost to industry of buying the leases and eventually paying overriding royalties. They also expect that a lower volume of filings will reduce their administrative workload and also reduce multiple filings.

Casual speculators

One of Interior's main objectives in raising the filing fee is to reduce participation by the casual speculator. Interior cited two main reasons for eliminating the casual speculator: (1) reduce the administrative burden caused by the high volume of filings, and (2) place more leases directly into the hands of the developers. Direct and indirect impacts are discussed below.

Reduction of administrative burden

According to a BLM official, the large number of SOG lease filings requires staff time and effort which takes them away from performing leasing functions on the other types of leases, such as over-the-counter leases. We are not certain to what extent this would impact on BLM's staff time. We agree that some of the staff work on more than one leasing system and SOG filings may take them away from performing other leasing functions. However, not all personnel, e.g., adjudicators in the Wyoming State office, normally would shift to work on processing SOG filings. Furthermore, the processing of lease filings may not require as much time after the leasing system is automated.

BLM is moving toward computer processing of SOG applications with the goal of using BLM-wide automation for reducing costs and the administrative burden associated with lease issuance and post-lease monitoring activities. The proposed automated system will screen for multiple filings and acreage limitations and contain information on lease transfers, assignments, unit agreements, relinquishments, etc. It is our understanding that a good deal of the administrative burden is the pre-award adjudication and the processing of the lease issuance. With no reduction in the number of leases issued, this aspect of the workload would not decrease. And, as to the drawing itself, BLM is projecting an 80-percent reduction in the number of applications processed and related key-punching as it converts to the new multiple parcel application forms in 1982. This may reduce the need to seek filing reductions simply to reduce the administrative workload. We will be examining the adequacy of Interior's changes to the lottery leasing system in our future work.

Direct lease awards to industry

Interior also wants to place the leases directly in the hands of industry. Our ongoing work addressing speculator involvement, however, indicates that slightly over half of the SOG leases were initially awarded to casual speculators, but that they were quite quickly assigned to developers, often in a few months. Nevertheless, some time would be saved. For the most part, however, our work indicated that delays in developing leases were attributable more to industry practices and to the fact that there is more land under lease than industry is likely to drill. Furthermore, after a lease is assigned or awarded directly to an oil company, the assignment process will still likely take place, with the initial lessee probably not being the one who actually drills. Thus, our work shows considerable assignment activity within the industry as tracts are consolidated into a drillable-sized parcel, priorities changed, etc.

Moreover, our past work suggests that even the casual speculator makes some positive contributions to exploration and development

by keeping land more readily available, than if it were unleased, and paying the annual rental on the leases until such time as industry is interested in them. A limited GAO sample of nearly 400 simultaneous leases, while not statistically projectable to the universe, suggests that about 13 percent of the leases outstanding are held by speculators and may not be of interest to industry. If so, the increase in filing fee receipts could be somewhat offset by a decline in rental revenues.

Industry

The increased fee could adversely affect industry's ability to participate as well, particularly in conjunction with the rental increase. An IPAA official advised us that many independents would likely file at the same dollar level as before, i.e., one-third as many applications as with a \$25 filing fee, and be more selective in their tract selection.

While \$75 may not on the surface seem significant to an oil company, the cumulative effect becomes larger. For example, one exploration company that wrote to BLM opposing the fee increase stated that it generally files on 100 to 125 parcels per drawing. This would amount to as much as \$18,000 a year at \$25, but \$54,000 at \$75. This firm also stated it holds an average of 35,000 acres, which are largely Federal leases. Assuming half of their acreage is on leases less than 5 years old, and half is on acreage over 5 years old, the increased rental (\$2 an acre more after 5 years) would add yet another \$35,000 a year to their operating costs. If Interior's projection of 2 to 3 million filings is accurate, and assuming these are made largely by industry, the filing fee cost alone represents an additional operating expense to industry of about \$150 to \$225 million. At about \$250,000 per well drilled, this additional expense may be a restraining influence on development, particularly with these being front-end costs with no offsetting revenues until sometime in the future. The accompanying accelerated rental could also eventually have a major impact.

Also, the higher filing fee will probably make it easier for the majors to take a more active role if they desire, which could offset to some extent any advantages the independent gained through speculator reduction. This increase could also place independents, as well as individuals, at a disadvantage and could be viewed as contrary to one of Interior's stated objectives, that of maintaining low barriers of entry for small firm participation.

Many of the individual public comments on the increase in the filing fee indicated that a \$75 fee violates the intent of the 1960 amendment to the Mineral Leasing Act, which permits all U.S. citizens to participate in the simultaneous leasing program.

Although the Omnibus Budget Reconciliation Act does not specifically keep individuals from participating, the increased fee may have the effect of denying participation to those individuals with limited capital. Nonetheless, the Reconciliation Act states that the fee is "not limited to actual costs" and Interior interprets this to permit the fee to be used for producing revenue even if it deters applications.

Filing services

The filing services will presumably be severely affected by the increase, since they apparently rely heavily on the casual speculator for their clientele. It has been alleged by some critics of the SOG that many of these filing services serve no useful purpose anyway, misleading prospective applicants with exaggerated promises of instant wealth, and generally providing little service for the additional fee they charge. We do not know the extent of this; however, there are filing services that do seem to provide a useful service as investment advisors, by evaluating such things as successful or unsuccessful drilling on nearby leases, industry interest, etc. We were told by an IPAA official that even some industry lessees use the services of these firms.

Reduction of fraud

One of Interior's major considerations in raising the filing fee was to ensure the integrity of the SOG system, thereby regaining the public confidence lost through multiple filing disclosures. Interior believes that this increase, together with the ongoing Inspector General's investigations, and tighter administrative controls, will serve as effective means to deter and detect lottery fraud in the future.

The extent of fraud and multiple filings within the SOG is still under investigation. However, Interior believes that early Departmental estimates showing fraudulent lottery filings as high as 80 percent were overestimated. Officials in BLM and the Office of the Inspector General told us the Department's recent investigative efforts have shown that the incidence of lottery fraud is not as extensive as first thought. Such efforts have resulted in 16 convictions and the relinquishment of 266 illegally obtained leases as of mid-March 1982.

The Department is now taking steps to modify some of the rules and regulations 1/ put in place by the previous administration to prevent abuse of the SOG leasing system.

1/"Interim Final Rulemaking--Amendments to the Regulations Covering Oil and Gas Leasing on Federal Lands," Federal Register, February 19, 1982.

CONCLUSIONS

Interior believes the increased filing fee will (1) reduce casual speculation and multiple filings, thereby reducing fraud potential, development delays caused by assignments, and administrative burden, and (2) generate significant additional revenue.

Interior's analysis is, of necessity, based largely on conjecture, but we cannot rule out the possibility that the positive results foreseen may not materialize to the degree projected. For example, while it is likely that the \$75 fee will generate additional revenue over what was obtainable under either the \$10 or \$25 rate, Interior's projections of at least a million filings annually and \$150 million in revenues are far from certain.

We were also unable in the time available to determine the degree to which the problems the Department desires to overcome exist, or that they will be resolved through a fee increase. Our work suggests that

- reducing the number of filings is not necessarily the total or only solution to reducing the administrative burden;
- the casual speculator is not having that great an adverse effect on development, and in fact has certain positive aspects; and
- the true extent of fraud in the SOG may not be as great as initially supposed.

In addition, there are possible adverse effects that may not have been fully considered. For example, the increased filing fee, when coupled with the increased rental, could adversely affect industry's exploration activities, particularly that of the smaller independent.

We are not suggesting that Interior's analysis was totally off-base; in fact, there is very little empirical data on which to base projections. We only wish to emphasize that the results at this time cannot be predicted, and will not necessarily be positive.

We do suggest, now that the increase is in effect, that the Interior Department and the Congress closely watch the results, and be prepared to take remedial action if deemed necessary.

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Because of the need to have a report at the earliest possible date, as stated in your request letter, and as requested by

your offices, we have not obtained agency comments. Copies of this report are being sent to the Secretary of the Interior; the Director, Office of Management and Budget; and interested Senate and House energy committees; and will be made available to other interested parties upon request.


J. Dexter Peach
Director

Enclosures - 3

Congress of the United States
House of Representatives
Washington, D.C. 20515

February 11, 1982

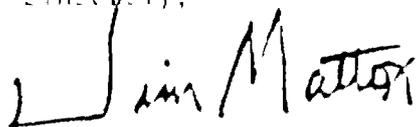
Mr. Charles Bowsher
Comptroller General
General Accounting Office
441 G Street N.W.
Washington, D.C. 20548

Dear Mr. Bowsher:

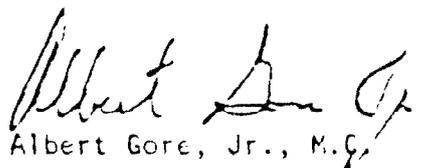
It is our understanding that the General Accounting Office has been conducting a study of the likely effects of the recent increase in filing fees for the Bureau of Land Management's noncompetitive oil and gas lease filing program.

Because the recently adopted increase to \$75 is due to go into effect next month, we request that this study be expedited and made available at the earliest possible date.

Sincerely,



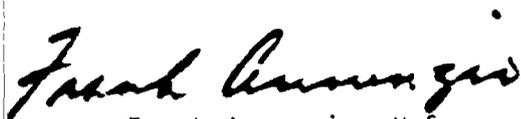
Jim Mattox, M.C.



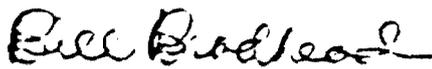
Albert Gore, Jr., M.C.



Wes Watkins, M.C.



Frank Annunzio, M.C.



William M. Brodhead, M.C.



Martin Frost, M.C.

NUMBER OF FILINGS IN THE
SIMULTANEOUS OIL AND GAS LEASING PROGRAM

<u>Fiscal</u> <u>Year</u>	<u>Number</u> <u>of Filings</u>
1970	345,838
1971	314,697
1972	449,535
1973	586,564
1974	1,170,453
1975	1,745,900
1976 + TQ	2,464,993
1977	2,585,733
1978	3,161,697
1979	3,634,566
1980 (note a)	2,228,902
1981 (Calendar Year)	4,665,449

a/The noncompetitive oil and gas leasing program was suspended February 29 through June 16, 1980.

Source: Department of the Interior

SIMULTANEOUS OR LOTTERY FILINGS AND (PARCELS)

OFFERED IN 1981 AND FIRST DRAWING IN 1982

<u>State</u>	<u>1981</u>						<u>1982</u>
	<u>JAN</u>	<u>MAR</u>	<u>MAY</u>	<u>JUL</u>	<u>SEP</u>	<u>NOV 1/</u>	<u>JAN 1/</u>
Arizona	0 (0)	1,506 (10)	1,174 (28)	390 (11)	162 (9)	311 (12)	128 (8)
California	6,387 (39)	9,224 (24)	4,756 (15)	6,007 (15)	5,249 (19)	2,485 (19)	2,650 (16)
Colorado	38,068 (68)	38,824 (24)	68,451 (76)	101,838 (110)	99,600 (112)	85,000 (126)	60,033 (131)
Eastern States Office	27,141 (74)	10,091 (44)	24,191 (27)	19,974 (47)	18,421 (27)	13,789 (34)	10,604 (45)
Montana	107,553 (190)	93,296 (150)	180,515 (199)	153,761 (220)	220,084 (179)	108,057 (154)	155,337 (200)
Nevada	3,438 (44)	2,765 (21)	10,759 (95)	7,593 (39)	6,527 (14)	2,095 (25)	2,779 (30)
New Mexico	144,459 (116)	113,211 (100)	52,088 (106)	49,160 (79)	178,400 (134)	7,877 (65)	15,770 (99)
Oregon	0 (0)	0 (0)	3,188 (19)	0 (0)	0 (0)	1,332 (26)	0 (0)
Utah	73,655 (98)	75,321 (75)	115,690 (85)	121,252 (97)	142,230 (103)	123,671 (169)	55,858 (168)
Wyoming	314,811 (180)	342,515 (223)	342,577 (112)	368,769 (195)	356,138 (249)	259,623 (344)	246,893 (487)
Total	715,512 (809)	686,753 (671)	803,389 (762)	828,744 (813)	1,026,811 (846)	604,240 (974)	550,052 (1,184)

1/ \$25 filing fee, other drawings had a \$10 fee

Source: Department of the Interior with the General Accounting Office obtaining January data from BLM State offices.