

November 11, 2011



Attention: Regulations and Standards Branch (RSB)
Bureau of Ocean Energy Management, Regulation and Enforcement
Department of the Interior
381 Elden Street, MS-4024
Herndon, Virginia 20170-4817

Subject: Revisions to Safety and Environmental Management Systems (SEMS), 1010-AD73

Ladies and Gentlemen:

ExxonMobil appreciates the opportunity to submit comments regarding the proposed Revisions to SEMS as requested in Federal Register dated September 14, 2011.

We commend the Department's efforts to improve the safety of operations on the OCS with the revised SEMS rule. In support of this effort, ExxonMobil would like to offer comments in five specific areas which we believe would improve the effectiveness and facilitate implementation of the final rule.

§ 250.1911 - Job Safety Analysis (JSA)

ExxonMobil supports the use of JSAs for pre-job planning. Acknowledging that a wide range of activities occur during the daily course of operations, however, the person in charge of the facility may not always be the appropriate party to review and approve every JSA. As written, this requirement has the potential to undermine the strength of the JSA process by eliminating the individual risk identification and analysis process for minor tasks, and may result in a decrease in the overall safety of operations. We suggest rewording this section to assign the responsibility of JSA approval to the supervisor most knowledgeable and in charge of the task, rather than the person in charge of the entire facility.

§ 250.1915 - Training Requirements

ExxonMobil supports the concept of verifying contractor training. ExxonMobil recommends that the BSEE accept the Knowledge and Skills Documentation Worksheet that is included in the API Center for Offshore Safety's SEMS toolkit as a valid means of evaluating and verifying that contractors have been trained.

§ 250.1926 - Independent Third Party Auditing

ExxonMobil supports the concept of utilizing independent third party auditors to assess SEMS compliance. However, we encourage the BSEE to pre-approve auditors accredited through the API's Center for Offshore Safety's third party accreditation process.

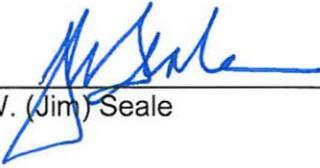
§ 250.1930 - Stop Work Authority

ExxonMobil supports the concept of a Stop Work Authority program. However, as currently written, the regulation has the potential to result in workers not stopping work activities for minor unsafe conditions if it would require the Ultimate Work Authority to authorize work to resume. Additionally, the individual with Ultimate Work Authority may not always be the appropriate party to authorize startup of activities following work stoppage due to minor events such as stopping work due to the use of an incorrect wrench. The immediate task supervisor is more appropriate. The final regulations should consider a scalable approach to addressing unsafe activities (e.g., tripping hazard vs. well control), and take into consideration appropriate levels of supervision.

§ 250.1933 - Reporting Unsafe Work Conditions

ExxonMobil supports continuous observation related to worksite and personnel safety and the encouragement of employees to communicate unsafe work conditions. However, the first action following identification of an unsafe activity should be facilitating making the working environment safer as quickly as possible by eliminating the hazard. In addition to the current proposed criteria, ExxonMobil suggests adding a requirement for personnel to also notify the operator of unsafe conditions so they can be addressed and remedied immediately.

ExxonMobil appreciates the opportunity to provide comments and believes the adoption of these suggestions will help to clarify the proposed regulations. Please do not hesitate to contact me at (713) 656-9704 if you have questions or would like any additional information.



J. W. (Jim) Seale