



OFFSHORE OPERATORS COMMITTEE

October 13, 2008

Department of the Interior
Minerals Management Service (MS 4024)
Attn: Regulations and Standards Branch-Technical Changes to L & O
381 Elden Street
Herndon, VA 20170-4817

Re: RIN 1010-AD 50; Technical Changes to Production Measurement and Training Requirements
FR Vol. 73, No. 181 9-17-2008

Ladies and Gentlemen:

The Offshore Operators Committee (OOC) appreciates this opportunity to provide written comments on the subject proposed rule for changes to Sub Part L and Sub Part O as published in the September 17, 2008 Federal Register. OOC is an organization of some 130 producing and service companies who conduct essentially all of the OCS oil and gas exploration and production activities in the Gulf of Mexico. Comments made on behalf of OOC are submitted without prejudice to any member's right to have or express different or opposing views.

OOC appreciates that the proposed rule will eliminate requirements for having to obtain certain waivers associated with production measurement regulations in Subpart L following force majeure events. OOC suggests that MMS consider similar revisions associated with the production safety system testing requirements in Subpart H (30 CFR 250.804). This would further reduce the number of waiver requests immediately following force majeure events. Some specific comments and recommendations regarding these proposed revisions in L are noted below.

Subpart L

- 250.1202 (d) (3) Revise the ending to read –“...within 15 days after being returned to service *and monthly thereafter but do not exceed 42 days between meter factor determinations.* This would make clear that this is not a make up proving and the time interval starts over with the proving after return to service.

- 250.1202(e) (3) Add *Calibrate the master meter monthly, but the time elapsed between calibrations must not exceed 42 days. When a force majeure event precludes the required monthly calibration, the master meter must be calibrated within 15 days after restoration of production and monthly thereafter.* This is added for consistency when master meters are used.

- 250.1202(k) (3) Revise the ending to read – “...within 15 days after being returned to service *and monthly thereafter* or”. Added for clarification.
- 250.1202(k) (4)) Revise the ending to read – “...within 15 days after being returned to service *and quarterly thereafter* or”. Added for clarification.
- 250.1204(b) (1) Revise the ending to read – “...within 15 days after being returned to service *and bimonthly (or other frequency approved by the Regional Supervisor) thereafter* “. Added for clarification.

OOC is of the opinion that the vast majority of the OCS workforce is well trained and capable of performing their **specific jobs**. The fact that MMS interviews, in MMS’s opinion, indicated a poorer understanding of MMS regulations and the training requirements does not directly relate to the offshore workers ability to perform specific jobs on a complex. Likewise, INCs issued during audits have primarily been associated with training requirements for contractors being spelled out, recordkeeping and documentation. OOC is not aware of any INCs or incidents offshore that have been the result of lack of training. MMS testing of a very small sample of 3 employees in well control and 3 in production safety systems two years ago is also not an indicator of a lack of understanding of MMS requirements given the large number of offshore workers(30,000 or more in any given day). It is OOC’s opinion that the preamble discussion associated with this Subpart O revision does not accurately portray the current capability of the offshore workforce. A large portion of MMS complaints are in the area of field personnel not knowing in detail all of the training program requirements and timing that were drafted by office personnel to meet compliance needs. It would seem that it should be more important for the field personnel to know what to do and why they are doing it than to know that they have to be re-trained XX number of months apart.

Subpart O

- 250.1500 Definitions – Recommended Revisions

Contractor means anyone other than an employee performing well control and production safety duties for the lessee.

This definition is consistent with the definition of *Employee*. It also delineates between those contractors performing well control of production safety operations (required to have training by Subpart O – Well Control and Production Safety Training) and those contractors not performing well control or production safety operation, such as domestic services, painters, inspectors, etc. and others the lessee may utilize in conducting day to day operations.

Periodic means occurring or recurring at regular intervals.

This definition as revised is consistent with NTL 2008-N03. The remainder of the proposed definition is not a definition, but is a reminder of requirements found elsewhere in the Subpart O regulations (250.1503 & 1506).

Production Safety means production operations, as well as the installation, repair, testing, maintenance, or operation of surface or subsurface safety devices. Production operations include, but are not limited to, separation, dehydration, compression, sweetening, and metering operations.

In this definition's first sentence the words "*includes safety in*" were deleted and replaced with the word "*means*". Also referring to activities associated with safety devices in that sentence "*and*" was replaced with "*or*" for intent and clarity.

This revised definition is consistent with the definition in **NTL 2008 –N03**.

If you have any questions, I can be contacted at 504-236-7933 or via e-mail at Vrat50@aol.com.

Yours truly,

Allen J. Verret

Allen J. Verret
Executive Director
Offshore Operators Committee