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November 11, 2011

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

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

On behalf of Stone Energy Corporation, please allow this letter to serve as Stone Energy Corporations comments to the proposed rule “Revisions to Safety and Environmental Management Systems (SEMS), RIN 1010-AD73”. Should you require further explanation or need additional information please contact:

Mr. Gene Cella
 Manager, Corporate HSE & Regulatory
 Stone Energy Corporation
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<u>Proposed Rule Citation</u>	<u>Stone Energy Corporation Comment on Proposed Rule</u>	<u>Stone Energy Corporation Suggested Revision</u>
§250.1911 (b)	Further clarification is needed for the term “OCS activities”. The proposed rule contained within this section is not definitive as to when or for what activities a JSA would be required.	
§250.1911 (b) (2)	Allowing for only the “immediate supervisor of the crew conducting the work” to conduct the JSA limits the ability for other appropriately trained personnel to conduct the JSA and / or to provide additional input into the JSA process.	Revise to: “The immediate supervisor of the crew conducting the work <i>or an appropriately appointed delegate knowledgeable in the task at hand</i> must conduct the JSA. The immediate supervisor of the crew conducting the work will sign the JSA, and ensure that all personnel participating in the job sign as well.”

<p><i>§250.1911 (c)</i></p>	<p>The time frames associated with the training requirements on the methods of recognizing and identifying hazards and the development and implementation of JSA's for ALL employees and contractors are unrealistic.</p>	<p>Revise to: "...You must provide training to these personnel within 30 90 days of employment, and not less than once every 12 months 2 years thereafter."</p>
<p><i>§250.1915 (c), §250.1928 (g) & §250.1932</i></p>	<p>There is no value in creating a new program as defined in §250.1932 to merely illustrate that the SEMS program was created through employee participation. The addition of §250.1932 does not add value to the original intent of the implementation of a SEMS program to ensure safe and environmentally conscious operations on the OCS. The sheer nature of the development and implementation of a SEMS program requires participation and input from various levels of personnel throughout an organization and with contractors.</p>	<p>Strike "employee participation program (§250.1932)" from §250.1915, (c) and (d).</p> <p>Strike in its entirety §250.1928 (g)</p> <p>Strike in its entirety §250.1932.</p>
<p><i>§250.1920</i></p>	<p>Stone Energy Corporation does not agree with the proposed rule to remove the option for the operator to use designated and qualified operator personnel to perform an audit of the SEMS program. Designated and qualified operator personnel have the potential to provide the most relevant audit data due to the inherent knowledge the personnel would have of the program.</p>	<p>It is recommended at a minimum that the operator should have the opportunity to augment the independent third party audit with its own internal audits to demonstrate to the Bureau of Safety and Environmental Enforcement the effectiveness of the operators SEMS program.</p>

<p>§250.1926 (a)</p>	<p>Stone Energy Corporation does not agree with the requirement to nominate an independent third party to audit the SEMS program. The process appears to be cumbersome and burdensome to both operators and the BOEMRE.</p>	<p>It is recommended that selection of independent third party auditors, via the recommended selection criteria contained within §250.1926, be verified through a certification process and implemented by a third party consortium such as the Center for Offshore Safety (COS). Once an independent third party has been approved through the COS and BOEMRE, operators can simply choose from a list of prequalified independent third party auditors.</p>
<p>§250.1926 (b)</p>	<p>Stone Energy Corporation suggests applying a statute of limitations on the utilization of independent third party auditors who have also assisted in the development and / or maintenance of the SEMS program.</p>	<p>Revise to: “If an independent third party developed and / or maintains your SEMS program, then that person and / or its subsidiaries cannot audit your SEMS program <i>for a period of two years after the last date of service.</i>”</p>
<p>§250.1928 (f)</p>	<p>Documentation cannot be expected to be retained on a MODU if the operator releases the said MODU prior to the 30 day required record retention time frame.</p>	<p>Revise to: “For Stop Work Authority (SWA), you must document all training and reviews and must ensure that these records are kept on the facility for 30 days <i>or until the release of the MODU by the operator.</i>”</p>

<p>§250.1931 (a)</p>	<p>Stone Energy Corporation recommends that rather than identify an individual person with ultimate work authority (UWA), identifying the position with UWA would be more appropriate. This will alleviate possible confusion associated with crew changes / rotations for the individual associated with having UWA and with crew changes / rotations for all other personnel. All personnel will know that a particular position retains the UWA rather than a specific individual.</p>	<p>Revise to: “For fixed and floating facilities (e.g., floating production systems; floating production, storage and offloading facilities; tension-leg platforms; and spars) and for MODUs performing activities under BOEMRE’s jurisdiction, your SEMS program must identify the person <i>position</i> with the ultimate work authority (UWA), i.e. the person <i>position</i> located on the facility or MODU with the final responsibility for making decisions relating to activity and operations on the facility. This person <i>position</i> must be designated by the operator taking into account all applicable Coast Guard regulations that deal with designating a “person in charge” (in accordance with USCG definition) of a MODU or OCS facility found in 33 CFR 146.5 and 46 CFR 109.109. Your SEMS program must clearly define who <i>the position that</i> is in charge at all times.</p>
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Sincerely,



Mr. Gene Cella
 Manager, Corporate HSE & Regulatory
 Stone Energy Corporation