Standards: Past, Present, and Future

Doug Morris
Chief, Office of Offshore Regulatory Programs
May 5, 2017
Presentation Overview

- Standards as a regulatory tool
  - Historical perspective
  - Current use of standards
- Review of past BSEE Standards Workshops
- 2017 Workshop Evaluation Process
- Goals for the 2017 Workshop
BSEE Regulatory Model

- Hybrid regulatory system
- Program draws from a variety of concepts
- Model contains 3 key elements
  - Prescriptive requirements
  - Performance-based initiatives
  - Industry Standards
Why Use Standards?

- Provides consistency
- Benefits the regulator, industry, and consumer
- Establishes a baseline for minimum safety requirements
- Engages experts in a voluntary consensus process
- Provides efficiencies for the regulators
- Standards are updated on a continuous cycle
- The National Technology Transfer and Advancement Act requires federal agencies to use voluntary consensus standards in regulations, when possible
A study of 12 countries found that 1100 standards are referenced by regulators (Int’l Assoc. of Oil & Gas Producers).

Of the countries in the International Regulators Forum (IRF), the UK has the most standards referenced in its regulations (289), followed by the U.S. (202), and then Norway (183).

More than 40% of all standards referenced by regulators are American Petroleum Institute (API) standards or other U.S.-based standards development organizations.

About 20% of the standards referenced by regulators are International Standards Organization (ISO) documents.

Many of the existing ISO standards and Norwegian standards are based on API standards.

Recent discussions in the IRF, relate to the use of international standards or “equivalent standards”
BSEE selected 4 topics for detailed discussion based on incident reports, third party recommendations, and internal consideration of safety critical issues.

The Workshop provided an opportunity for BSEE to reemphasize the importance of establishing:

1. Safety as a top priority of the offshore Oil & Gas industry and regulators;
2. A framework to allow for collaboration between BSEE and industry in developing new standards, updating existing standards, and determining the best use of standards particularly focused on safety and environmental compliance;
3. An active dialogue on technical and regulatory policy issues with international oil and gas regulators, as well as SDOs.
2017 Workshop Evaluation Process

Evaluation expectations:

- Open an active dialogue among attendees
- Identify select standards issues concerning safety
- Determine the state of the art for the identified issues or concerns
- Identify gaps that need standards development in order to fully address the safety issues
- Provide a group judgment or sentiment concerning the uncovered issues
- Recommend a path forward for addressing each identified issue.
Goals for the 2017 Workshop

- Identify and discuss international regulatory concerns, incidents, and safety issues
- Identify gaps that need standards development in order to fully address the safety concerns
- Recommend a path forward for addressing each identified gap
- Provide a platform for continuing communication among operators, contractors, regulators, and the standards community, generally.
Questions, comments, or concerns?
“To promote safety, protect the environment and conserve resources offshore through vigorous regulatory oversight and enforcement.”