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**Anadarko**

APRIL KANAK  
SENIOR ATTORNEY

June 29, 1999

Department of the Interior  
Minerals Management Service  
Mail Stop 4024  
381 Elden Street  
Herndon, Virginia 20170-4817

Attention: Rules Processing Team

Re: Training of Lessee and Contractor Employees Engaged in Oil and Gas and  
Sulphur Operations in the Outer Continental Shelf (OCS) (Proposed Rule)

Dear Sirs:

Anadarko Petroleum Corporation is one of the country's largest independent exploration and production companies with operations both onshore and offshore. We are pleased to have an opportunity to comment on the Proposed Rule.

### Clarity

The MMS has asked for comments on how to make this Proposed Rule easier to understand. While we believe the intent of the Rule is clear, we still have many questions on implementation. For example, it is unclear as to what positions are covered under the training requirements and who is considered a "contractor." In the workshop, MMS representatives indicated that positions such as cooks were not the type of contractors that would be covered by the training requirement. We believe there are a number of other positions that should not be covered and this needs clarifications.

At the workshop, there were a number of questions that MMS representatives could not answer regarding implementation. These need to be addressed. A clearer baseline needs to be established.

### Testing

There is concern about the implementation of testing. We do not believe a universal test for all operators would be fair or practical. Companies have different equipment and different training needs and requirements according to individual locations and conditions.

### Testing Concerns

We understand that in the Pilot Program for testing, questions were asked about specific regulations and those tested were asked to quote regulations. Very few individuals would be able to remember complex regulations. For this reason, Anadarko keeps pertinent regulations onsite to refer to.

Testers should take into consideration that some offshore platforms have only two people and it could be a safety problem to tie up an individual in such a situation. We do not favor testing on workers' days off as this would increase overtime pay.

### Suggestions for Testing

1. Tests need to be oral.
2. Tests should not require memorization of regulations.
3. Tests need to be performance based and reference the specific training received.
4. Test answers should not be subjective. We favor yes or no answers.

### Time Estimates

Anadarko believes that the time estimates to develop and maintain training plans and document employee training activities are grossly underestimated.

### Enforcement

The preamble indicates that regardless of a company's safety record, if the MMS determines that the company is not training its employees, it will initiate appropriate enforcement action. Perhaps if this situation is found, the MMS should re-evaluate its testing method. A good safety record should be considered a mitigating factor in enforcement decisions.

### Implementation

Anadarko does not believe this program can be implemented in 90 days as suggested. We believe a minimum of one year is needed from the effective date of the rule.

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Endorsements

Anadarko would like to see the MMS endorse the well cap program that is the IADC well control training program. It would also be helpful if MMS could certify training programs that they determine provide adequate training. Since this rule requires contractors be trained, companies now have the added burden of auditing the schools contractor use as well as their own choices.

Conclusion

Anadarko questions why this rule needs to be changed as we believe it was working well as it was written. The regulations at 30 FR 250.1508 allow for operators that want to change the system to get an exception from MMS.

Very truly yours,



April Kanak

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