



13

CHAPMAN & ASSOCIATES



1128 Coolidge Blvd
Lafayette, Louisiana 70503
(318) 233-5667 ph / (318) 233-7667 fax

MMS Well Control Safety Training Specialists

Date: July 15, 1999

MEMO: Re. Proposed Rule

Topic: Training of Lessee and Contractor Employees in Oil and Gas and Sulphur Operations in OCS.

Attn: Rules Processing Team

Comments

GENERAL: After review of the published proposed rule of Tuesday April 20, 1999, I am led to believe that the classic phrase of "fixing something that is not broke" is being proposed. The basis for my opinion is the fact that I have been associated with the MMS and USGS programs almost since inception in 1978. I have worked from the administrative side at the University of Sothwestern Louisiana Petroleum Training Service (the first certified school) but also the instructional perspective. I feel my experience of administering or hands-on instruction of thousands of participants qualifies me to make educated comments regarding a program that has a long successful history of already accomplishing the majority of the goals defined in the proposed rule. I trust my 20+ years experience and first hand observance of the current programs evolution into a world standard for pressure control training establish credibility and basis for my comments. Additionally, the MMS statistics on incidents in the OCS waters overwhelmingly support the success of the current program. With todays environment in the oil patch, this is not the time to experiment with proven training that is currently in place and critical to the effective operations offshore, safety of the workers and maintaining environmental stability.

250.1501 No Comment

250.1502 The term "properly trained" will leave both the MMS , Operators and Contractors open for controversy when enforcement becomes an issue.

250.1503 The phrase "enough training to insure competency" is vague and would allow companies wishing to reduce training time and expense a defense of an INC. This defense extends the time that operations, offshore workers, and the environment is at risk .

250.1504 Topics 'o', 'p', 'q', and 'r'

Participation in Well Control exercises using interactive computer systems will compromise what has been historically effective hands-on training. For less trained or new hires, "Right arrow - close BOP, Left arrow - open BOP" will prove to be far less effective in providing a base of information to build on in their pressure control training experience. The result will again be operations, offshore employees and the environment at risk for the sake of rule change.

250.1505 No Comment

250.1506 This list of "other types" of training will need more definition and clarity as to specific topics and depth of training. Outlines similar to those of well control and production safety topics will be needed.

250.1507 The use of alternative training methods such as team, self paced, hands-on, on the job or computer based may be adequate for some participants but will be more difficult for the majority of the participants and will be more difficult to evaluate with less interaction with actual instructors.

250.1508 No Comment

250.1509 Frequency of training has been previously addressed as a middle of the road approach where some participants could use more training and some could use less. The result was everyone met a minimum level of training while others progressed beyond the minimum.

I conducted a non-scientific poll from participants regarding attitudes toward the old and current well control training programs. The majority preferred the old system utilizing refreshers. The majority also agreed the training was positive and necessary even though they questioned whether they would attend if they were not mandated. The majority agreed it would be a mistake in the long run to de-structure the current program.

250.1510 The assessment of a training program will be the most difficult aspect of the new program. Without quantifying results, I submit that an operator or contractor will think twice before paying a fine associated with an INC. that is subjective and can be challenged.

250.1511 No Comment

250.1512 No Comment

250.1513 As stated before, if the MMS intends to continue on the path of the proposed rule, "properly trained" will need to be addressed. Otherwise, additional time, paperwork and expense will be incurred. The results of these changes will be detrimental to the oil industry operations you are trying to help.