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July 16, 1999

30 CFR 250  
Minerals Management Service Proposed Rule  
Training of Lessee and Contractor Employees  
Engaged in Oil and Gas and Sulphur Operations  
In the Outer Continental Shelf (OCS)  
64 Federal Register 19318, April 20, 1999

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

Attention: Rules Processing Team

Dear Sir:

Hall-Houston Oil Company (HHOC) appreciates the opportunity to comment on the subject Notice of Proposed Rulemaking. Hall-Houston is an independent operator in the Gulf of Mexico Outer Continental Shelf with two manned production platforms, and four unmanned well protector platforms. Each of these platforms is contract operated. Hall-Houston contracts with Mobile Offshore Drilling Units and offshore supply vessels as well.

Hall-Houston supports the MMS's effort to simplify, clarify and provide more flexibility in the training regulations essential to safe and environmentally conscious operations. Hall-Houston attended the June 10, 1999 workshop and appreciated the open discussion and exchange of ideas concerning training. Consensus agreement that well trained personnel conducting operations in the OCS is an important goal for a safe and more environmentally sound "workplace" was voiced throughout the proceeding.

Hall-Houston Oil Company is an active member of the Offshore Operator Committee (OOC) and supports most of the comments made in their response, in addition, Hall-Houston has the following comments to the Notice of Proposed Rulemaking.

Like OOC, Hall-Houston does not see the need to make the proposed broad revisions to the training regulations, training is essential to the well being of all offshore workers, but a performance based measurement of training creates a "moving target" for all lessees in the GOM, OCS. Revisions to existing regulations addressing alternative training methods would allow the alternative performance based compliance to be utilized by those lessees requesting alternative compliance approval from existing "prescriptive" regulations, but would also allow lessees desiring a more prescriptive training measurement the opportunity to maintain that measure of compliance. In effect the NPRM requirement for all lessees to develop a detailed written training plan which includes training and job requirements for each position, for all employees, lessee or contractor, is a partial implementation of the "voluntary" SEMP. If an operator has implemented SEMP the NPRM would be a duplication of labor, which is both inefficient and uneconomical in a time of reduced administrative personnel and increased work load. To "incorporate by reference" API RP 75 SEMP to the existing regulations would automatically provide an "alternative training method" for those operators desiring to use their SEMP plan as an "alternative training" method and allowing other operators a more prescriptive method of training requirements and guidelines for the lessees to take in their approach to training of employees, both lessee and contractor. The ultimate measure of either method being overall performance. SEMP may not have been implemented across the board and those lessee without SEMP or who feel a more prescriptive method is recommended would benefit as well from maintenance of the more specific guidelines currently reflected in the regulations. The MMS already requires a performance review every year and ranks operators, based on previous years performance; API requests a "voluntary" response to implementation of SEMP by operators in the OCS and has offered this information in anonymous format to MMS for the past several years.

The additional paperwork and record keeping associated with this NPRM is inefficient and counter productive as most operators have some form of measurement of adequate training requirement established through their contractor's, either through the "voluntary" SEMP or through specific job related requirements. This additional burden on an already diminished workforce would be a duplication of effort and both inefficient and uneconomical. It seems that the MMS in an effort to move away from "accreditation" of training schools, to diminish a burdensome part of the existing regulations, is in effect creating more work in "accrediting" each OCS operator's training plan through performance reviews and audits, at the ultimate expense of the offshore labor force.

The revision of existing specific requirements for training and time frames in which to perform basic and renewal training create a "moving target" for the MMS to review. MMS contends this will allow them to focus on operators with poor performance records on the OCS, however, MMS already has that "right" under current regulations and therefore, the need to revise or change the regulations seems redundant. If on the other hand MMS revises the NPRM to "incorporate by reference" API RP 75 as an "alternative training method" and keep the current defined regulations, then the "target" becomes more defined.

Additional costs associated with full implementation of this NPRM would exceed the cost burden outlined in "Supplementary Information". Many operators have spent large sums on SEMP as an "alternative" to performance measures, and those operators should be allowed to use SEMP as their preferred training, while operators who have been reluctant to "voluntarily" implement SEMP would

be able to remain under current regulations.

Safety, Health, Environment and Training on the OCS are currently regulated by four federal agencies; the MMS, USCG, DOT and EPA. While each agency may focus on a different aspect of E&P operations there is some overlap of jurisdiction. The end result is an adequately if not overly regulated and monitored industry. The financial burden not to mention additional administrative cost of yet another change to regulations that are not in need of major revision is hard to comprehend in a time of diminished returns in the E&P industry, therefore this NPRM cannot be endorsed in its entirety.

The current regulations should be maintained with a section included for "alternative training" to incorporate by reference existing SEMP at API RP 75. This allows companies that have already spent time and money implementing their training program through SEMP to maintain consistency and compliance with regulations while their overall performance measurement (ranking) at MMS indicates the validity of their program. It also allows flexibility for other operators who have not put together an "alternative" program to continue under existing prescriptive regulations.

The bottom line should not be how many books are on the shelf, nor how much money is spent, but how well in reality an operator performs in the offshore environment, MMS will continue to inspect operators and MMS will continue to issue Notice of Non-compliance, but the end result is whether the operator has a significant level of good performance over poor, and how well that performance is reflected in the lessee employees, or contractors operating in that environment.

If you require additional information, please contact me at 713-228-0711 ext. 128.

Sincerely,

Hall-Houston Oil Company



Beth Atwood  
Regulatory Manager