

Author: RSmith7389@aol.com at ~smtp  
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**NOTED - RHOME**  
**Operations & Analysis Branch**

TO: Wilbon Rhome at ~MMS-Herndon-OCS2  
CC: GNanceW@aol.com at ~smtp, Schafer100@aol.com at ~smtp, PLYONS7983@aol.com at ~smtp,  
LeBlanc312@aol.com at ~smtp, JayC112@aol.com at ~smtp, Norton100@aol.com at ~smtp,  
GregRSTS@aol.com at ~smtp, THayesRSDS@aol.com at ~smtp, teddy@randysmith.com at ~smtp,  
jennifer@randysmith.com at ~smtp, sherry@randysmith.com at ~smtp  
Subject: Comments on the Final Rule from Randy Smith Training Schools  
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Dear Sir:

**RULES PROCESSING TEAM**

**JUL 20 1999**

We appreciate the MMS working to make things better in well control and blowout prevention in the OCS waters. Without the MMS rules, we would definitely have more industry disasters and problems to worry about.

With this in mind, we would recommend that you keep involved with well control training and monitoring here in the U.S.A. We also recommend that you take this chance to improve the system in place as follows:

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1. Keep the two year 5 day required Basic Well Control Course. We see that the students need this for sure. Some students need more training than this, but this is fair to both weak students and strong students.
2. Let us be creative and use any possible means to teach the classes. CD ROMs, classroom, videos, simulation, hands-on, lecture, homework, etc. have been very good for our classes. We need the new technology and teaching aids to keep class interesting and to help the learning process as much as possible and to also have the best retention. Subjects to cover in the classes, as listed in the rule are fine, but let the trainers plan the time and course delivery methods to cover the subjects adequately.
3. We recommend that testing should be done at the end of a course at a training center. MMS could come to any course and give a standard test to the students. We would welcome this kind of "spot testing" at one of our centers or wherever we are giving a course.
4. We recommend that tests should be designed for the Floorhand, Driller, Toolpusher, Operator's Rep., Coiled Tubing, or Snubbing Supervisors. Before CFR 250, subpart O, we had tests for each job and this worked quite well. Now, everyone takes the same test and this is not fair to everyone. With the ability to give the different tests, we could really test for the competence we expect the different positions to know.
5. We recommend independent testers for the courses we teach. They would come in on the last day of a course and give the tests. We do this with the IWCF and it works just fine. We do not teach the test, we teach the required curriculum with the required simulations. MMS would just give the tests, grade them and keep the results.
6. We recommend that an MMS course evaluation be completed by the students at the end of a course and given to MMS for review in order to get valuable feedback from the students on the courses. If evaluations kept coming in with complaints, then there would be reason to audit or test a center. Our clients now get all evaluations on the students that they send to us. We discuss any evaluation that needs discussing and we have sometimes taken their comments and actually improved the courses. Specific feedback is the key to seeing that we can make a difference.

7. We recommend keeping the combination of classroom and simulation in the 5 day courses for Driller, Toolpusher, and Operator's Rep. We would also recommend that

Floorhand training include at least 2 days of classroom training with some simulation.

They can still have their floorhand "hands-on" training on the rig, but we have seen that they need classroom time to ask questions, get quality instruction, and see a simulation.

8. We recommend that Deepwater Well Control certification needs to be required for any rig drilling in over 2,000 feet of water depth. We recommend a deepwater class of 5 days to satisfy this requirement or add on two more days of training to the Basic course.

9. We recommend that the job category of Subsea engineer be added to required well control training, just as the driller, toolpusher, and operator rep. are in the rules. During Kick operations, the subsea engineer needs to understand as much as the others so he can operate his equipment safely.

10. If MMS does in fact go with the final rule and gets out of the training certification, then we recommend that the drilling industry go to the IADC Well Cap certification Process. Then, we would like to send our comments to them for consideration for future training.

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MMS needs to keep involved with the OCS waters in the prevention of oilwell blowouts and to promote proper well control procedures, processes, and training methods. If you have any questions or comments about our recommendations, please feel free to give us a call.

Randy Smith  
Randy Smith Training Schools