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COPY TO STEVE KROPLA, IADC HEADQUARTERS

Please find below my comments on your proposed changes to 30 CFR Part 250-Training of Lessee and Contractor Employees

#### MY EXPERIENCE IN THE OIL AND GAS INDUSTRY

I have worked in the Drilling Industry for the past 30 years, and have held positions in Management and Operations with both a Lessee and Drilling Contractor. I gained relevant exploration experience around the world, in the areas of Petroleum Engineering Operations and Drilling Training. I have held positions as a United Nations Advisor on Oil Industry Training, a Government Training Advisor, an Oil Company Training Manager and a Drilling and Well Control Instructor.

#### OBSERVATIONS

As an industry, we are left to ponder, what is driving this dramatic change to the format of Prescribed Training we have used for our operations personnel over the past 20 years?

As I see it the MMS is proposing the introduction of TWO "new" concepts. The first is the introduction of a Performance Based Training Program to replace the present system of Prescribed Training. In training terms, this is a part of the overall evaluation of a training program to see if it has met it's objectives. When an existing training program has failed to be effective in producing the desired results then, a change in methodology is normally considered. This calls for an examination of how the former training program failed. I have not seen or heard of any evaluation being done by the MMS on the effectiveness of the Prescriptive Type training presently being offered. It is therefore difficult to find a reason for change when an evaluation has not been done and there are no results available.

The second new concept is one I have personally experienced. It was described at that time as a Safety Program which required the operator of a lease to take full responsibility for safe operations on that lease and is a strategy which has great merit. I am familiar with one lessee who has been using this program for 10 years and unfortunately there has been no tangible evidence of an improvement to their safety record. Also, it has created more legal difficulties involving contractor personnel suing both their employer and the oil company.

#### **DIFFERENCES IN DRILLING V'S PRODUCTION TRAINING**

The training needs of Drilling and Production Operations people vary significantly and should be considered separately. This was not done in the original rule and appears to be carrying over to the new proposal. The change in emphasis from Prescribed Training to a Performance based system, is a logical move for relatively stable Production Operations positions where Well Control training needs are not so critical. The training needs in Drilling and Workover Operations on Offshore Installations on live wells, are far more critical, particularly in exploration work. The requirement for periodic retraining has to be viewed as a higher priority because of the much higher turnover rates experienced in this profession. The role and responsibilities that Drilling people have to play in supervising the drilling of live exploration wells is similar to that of an airline pilot. The Government (FAA) requires annual pilot retraining and ALSO recognizes the value of Performance Based Training by insisting on both simulator competency and written testing. This would also seem to be a logical requirement for Drilling operations personnel who have similar responsibilities on offshore installations.

#### **MONITORING OF PERSONNEL PERFORMANCE BY THE MMS**

I am sure you are well aware this will be a tremendous challenge for the MMS. With Government staffing levels always a growing concern, and approx. 130 OCS Operating companies to monitor, it will prove to be a very difficult task. For example there are less than 30 approved Drilling Training schools in the country and my company has only been visited by an MMS representative on 3 occasions in 20 years. The reasons given by the MMS have always been the lack of personnel to monitor the schools. The MMS proposes testing of lessee and contractor personnel on location. As testing is an integral part of any performance based training program it is important it is done regularly and efficiently. Accomplishing this at

offshore operations (especially when carrying simulator equipment) is a major challenge.

### **WHY WE NEED TO TRAIN DRILLERS PERIODICALLY**

Our industry is going through a massive reorganization and downsizing. This is resulting in a dramatic loss of qualified field operations people. The experience levels have been drastically reduced, leaving a relatively young inexperienced group to run an ageing oilfield. The timing of the introduction of a training program which calls for self-monitoring by the industry is rather unfortunate. Consideration should be given to moving towards a performance based program with the necessary testing improvement, while still retaining (even temporarily) the requirement for periodic retraining. As the testing proves to be successful then the move to abandoning the need for prescriptive training could confidently be made. Let's crawl before we walk!

There are no prescriptive training requirements in Well Control for personnel working at on-shore locations in the USA and in many overseas countries. Our record in these areas is very poor. The well control incidence rate is dramatically higher (ten times higher) and it is because of the lack of enforcement of good training. Time and again we see examples of poor market conditions controlling the training budgets. "If it is not a requirement, then we won't do it!" is what we in the Drilling training business hear when trying to offer training in areas other than Well Control. A common response from contractors is that if the oil company will not pay for it then we shall not do it!

### **CONCLUSION**

Some elements of job training can, and should be left, in the company's capable hands. Unfortunately, something as critical as Well Control training cannot! In time, I fear the MMS will regret this move away from a prescribed format and unfortunately, I believe we shall eventually return to the high incident rates of the 1960's and 70's. The world praised the lead given by the USA in this important facet of this industry, and will be surprised by the drastic nature of the change in direction. Usually, such steps are taken when a system has failed to produce results. In this case the results speak for themselves. We have at present a safe working