



WELL CONTROL SCHOOL

July 8, 1999

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

Rules Processing Team

This letter serves as a response to the proposed changes in the Subpart O Training Regulations by WCS, Well Control School and to formally submit our comments to the U.S Department of Interior, Minerals Management Services. WCS also requests, as the largest well control training entity in the United States, that all consideration be given to the following.

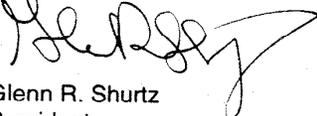
1. The transition period that was stated in the June 10, 1999 meeting in Houston is inadequate. Lessee's, contractors and vendors will simply not be able to initiate a satisfactory program within that timeframe. WCS recommends a grandfather clause with a complete training cycle (as it exists in the present regulations) for a smoother transitory period. This would also minimize the economic burden to companies developing compliancy plans and ensure personnel are receiving training until competency standards and programs are in place.
2. If comment #1 is acceptable, we would also recommend that the MMS requires and acknowledges MMS certificates issued during the transition period and through the expiration of those certificates. Example, if the last certificate issued is 12/15/00, then the holder would not need to prove competency or obtain re-certification in these skills until its expiration. This would greatly assist the lessee or allow another certifying entity (with MMS approved competency standards) to resume the accreditation process while the certificate holder would be able to show/prove current competency and proper documentation of such.
3. WCS recommends that a mandatory timeframe for training/re-training remain embedded in the regulations. Without such requirements personnel will not receive training to remain current on new regulations, technologies and equipment. It is very likely if no timeframe is imposed that personnel, once trained, may receive a "once-in-a-lifetime" certificate or exemption card that relieves him/her of responsibilities to document and prove his/her knowledge and responsibilities once issued. The results of the proposed regulations cannot be predicted at this time. With repeat training still in place this will ensure MMS that some form of additional training will continue until such results can be evaluated. Then, if MMS feels it appropriate to eliminate the repeat training clause in a future revision, it will have proper documentation to do so.
4. WCS recommends that the MMS take the responsibility to gather lessees, contractors, schools and vendors, through public forums, to draw the industry together and to conclusion to define competency standards. Without such effort from MMS, over 160 lessee's will have as many "ideals" and standards and may not be able to quantify program deficiencies. This is exponentially increased by the amount of variations of contractors and vendors programs incorporated within the lessees' program.
5. WCS recommends that MMS make its competency test base questions public knowledge so lessees can tailor skills and programs to meet MMS competency standards.

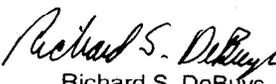
6. WCS recommends that MMS defines how it will conduct onsite competency audits. For example, the MMS stated that the costs of such audits will be the burden of the lessee. As such, this now suggests that all audits must be announced so the lessee can arrange suitable, timely and economical transportation for the MMS inspector. Should the MMS decide to provide suitable transportation and arrangements, how will the lessee be billed, and will the lessee have rights to copies of all receipts thereof?

Points to illustrate that proposed Subpart O is not ready for publication:

- What will inspectors check for at the jobsite when the new regulations state "records and documentation will be kept at the home office?" Without some type of certificate it will not be possible to see records onsite.
- What documentation is necessary? You stipulate what type, when and where training was conducted, but also say that documentation must be kept at home office? Are duplicate records necessary?
- There are hundreds of consultants employed in the OCS. Where are their training records and documentations going to be kept?
- Currently the MMS requires schools to maintain records. Is it correct to state that we no longer are required to do so? What documentation will a school be required to submit to a lessee for their records? Certificate that they have some kind of training? Scores? Worksheets?
- Why does well servicing not include a floorhand level? These are the personnel responsible for supporting the unit and often will run it.
- P&A operations need to be clearly defined. This is not currently defined in the proposed regulations – is training required? Personnel in this discipline kill producing wells, remove trees, close SCSSVs, etc., yet the training they should receive has never been properly defined.
 - Under definitions in the proposed Subpart O, there are no references or definitions for "Drilling"
 - Coiled tubing operations restore production. Should we suggest personnel are trained in workover/completion in lieu of well servicing? Or in addition to?
- Well servicing also includes wireline. This has not been identified by MMS.
- Can a coiled tubing operator remove a Christmas tree?
 - If a company has employees whose assigned skills aren't do not include those found in the Safety, Knowledge and Skill Elements" checklist – are they now responsible to be competent in these as well?
 - WS personnel must know bullhead, l&b to kill well – why not also require to perform simulator exercises?
 - How can universities or commercial entities maintain quality without continued students, repeat training or clientele?
 - If instructors are asked to teach multiple courses (e.g., well control for week one, truck driving for week two, computer training the third week) where did the high quality well control instructor go?
 - Minimum skills checklist has many oversights and inconsistencies. This should be properly defined prior to final Subpart O. WCS would assist MMS with this if requested.
 - Simulation exercises should be mandatory for well service disciplines to show competency and to comply with the proposed Subpart O, Safety knowledge and skills element chart. The well service personnel perform work in pressured environments, yet have no set competency requirements to be able to demonstrate well control skills.

Regards,


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President


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