UNITED STATES DEPARTMENT OF THE INTERIOR
MINERALS MANAGEMENT SERVICE

NTL No. 2001-N03

Effective Date: November 05, 2001
Rescission Date: October 15, 2002

NOTICE TO LESSEES AND OPERATORS OF FEDERAL OIL, GAS, AND SULPHUR LEASES IN THE OUTER CONTINENTAL SHELF

30 CFR 250, Subpart O - Well Control and Production Safety Training

This Notice to Lessees and Operators (NTL) supersedes NTL No. 2000-N03. It restates Minerals Management Service policy during the transition period of the revised 30 CFR 250, Subpart O, training regulations published in the Federal Register on August 14, 2000 (65 FR 49485). This NTL also addresses questions and concerns that have been raised regarding § 250.1504 on alternative training methods.

The new performance-based Subpart O, Well Control and Production Safety Training, regulations took effect on October 13, 2000. To allow sufficient time for you to develop and implement your training program, § 250.1502 provides a 2-year transition period from October 13, 2000 until October 15, 2002. During the transition period, you may either:

(1) Continue to comply with the previous regulations that were in effect prior to October 13, 2000. If you have employees whose current Subpart O certificates expire during the 2-year transition period, you must retrain those employees in accordance with the previous regulations, or

(2) Notify the MMS Regional Supervisor, in writing, that you have implemented the new Subpart O regulations. You are only required to notify the MMS Regional Supervisor during the 2-year transition period. After October 15, 2002, you are required to comply with the new rule and, therefore, no notification would be necessary.

In addition to the superseded NTL No. 2000-N03, on August 17, 2000, we sent a letter to all MMS-approved training schools and organizations to clarify the new regulations. We explained that after the new regulations became effective, MMS would no longer accredit training schools or organizations. However, we provided that all training schools or organizations with valid MMS-accreditation would continue to be accredited until October 15, 2002, according to their training curriculum and plan as currently approved by MMS. Therefore, if you are operating under option (1) above, you have the same training schools or organizations from which to choose training for your employees during the transition period.

All certificates or cards issued by MMS approved training schools or organizations expire on October 15, 2002. After this date, we will not recognize as valid any cards or certificates issued by training schools or organizations which indicate or imply compliance with the requirements of 30 CFR 250, Subpart O, training regulations. However, training cards or other evidence of

employee competency may still factor into the training plans required under § 250.1503 of the new regulations.

Recently, MMS has received questions concerning hands-on training as it applies to alternative training methods. As stated in § 250.1504 in the new Subpart O regulations, alternative training methods (e.g., computer based, films, or equivalent) should be reinforced by appropriate demonstrations and "hands-on" training. Hands-on training procedures should be identified in your training plan. It is not the intent of the new regulations to allow alternative training to "stand alone" without such reinforcement.

Paperwork Reduction Act of 1995 (PRA) Statement: The collection of information referred to in this NTL provides clarification, description, or interpretation of requirements in the 30 CFR 250, Subpart O, Well Control and Production Safety Training regulations. The Office of Management and Budget (OMB) has approved the information collection requirements and assigned OMB control number 1010-0128. This NTL does not impose additional information collection requirements subject to the PRA.

Contact: If you have any questions about this transition policy, you may contact Joseph Levine at (703) 787-1032.

Date: 11/05/01

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