



# INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

P.O. Box 4287 • Houston, Texas 77210-4287 USA  
10370 Richmond Ave., Suite 760 • Houston, Texas 77042 USA  
Phone: 1/713-292-1945 • Fax: 1/713 292-1946 • www.iadc.org

15 September 2009

Docket ID MMS-2008-OMM-0003

Department of the Interior  
Minerals Management Service  
ATTN: Regulations and Standards Branch (RSB)  
381 Elden Street, MS-4024  
Herndon, Virginia 20170-4817

Re: Safety and Environmental Management Systems for Outer Continental Shelf Oil and Gas Operations, 1010-AD15

To whom it may concern:

The International Association of Drilling Contractors is a trade association representing the interests of drilling contractors, onshore and offshore, operating worldwide. Our membership includes all drilling contractors currently operating mobile offshore drilling units (MODUs) in the areas subject to the jurisdiction of the United States, as well as all MODUs registered in the United States.

The purpose of this letter is to respond to the Minerals Management Service (MMS) 17 June 2009 proposed rule (74 FR 28639), which requires each offshore lessee/operator to develop, implement, maintain and operate under a Safety and Environmental Management System (SEMS) to address the oil and gas operations on the Outer Continental Shelf (OCS).

IADC's concerns regarding the information collection burden requirements of this proposed rulemaking were submitted previously to this docket in our letter dated 17 July 2009. Those comments, which are not repeated here, should also be given consideration by MMS.

In accordance with API RP 75, IADC believes that drilling contractors should be encouraged to develop and maintain robust and effective SEMSs. IADC is concerned that any prescriptive imposition of mandatory SEMS elements upon operators has the potential to adversely impact drilling contractors' SEMS, if a careful balance between the operators' perceived need to impose those SEMS elements against the contractors' need to manage their own SEMS is not achieved. Clearly the goal should be that a drilling contractor could move between operators with little, if any, modification to the contractor's SEMS.

IADC is also concerned by the proposed requirement for a task-level Job Hazards Analysis (JHA). While we understand that this may be more correctly described as a Job Safety Analysis (JSA), we believe that there needs to be a better understanding of both what constitutes a JSA,

## ISEMS for Outer Continental Shelf Oil and Gas Operations

and for what tasks a JSA should be developed. (Does MMS expect a JSA for operation of a copy machine?)

We further believe that the record retention requirements for the JSA and related index are unduly burdensome and contrary to MMS' stated intent that the programs not become a paperwork exercise. The proposal also creates concern regarding "ownership" of the JSAs/index once a MODU is no longer under contract for the operator under whose contract they were developed.

IADC appreciates the opportunity to comment on the proposed rulemaking. Please contact me by phone at (713) 292-1945, ext. 203 if we can provide any additional information.

Sincerely

A handwritten signature in cursive script that reads "John Pertgen".

John Pertgen  
Assistant Director, Offshore Technical  
and Regulatory Affairs