BSEE Regulatory Viewpoint

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BSEE – Regulatory Viewpoint

- The Way Ahead
- Regulatory Update
- SEMS Highlights
- Conclusion
Beyond Compliance to Offshore Excellence

Strategies:

- Blend Prescriptive and Performance-Based Approaches
- Compel safety, emergency preparedness, environmental responsibility, and appropriate development and conservation
- Build and sustain this capacity within and across BSEE’s key functions
BSEE Regulatory Update

• Regulatory Priorities
  – Final Drilling Safety Rule
  – SEMS II
  – Blowout Preventer Rule
  – Production Safety Systems and Lifecycle Analysis Rule

• Regulatory Policies Update
  – Oil Spill Response Plan NTL
  – Contractor Compliance

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Safety and Environmental Management Systems

SEMS is a comprehensive, performance-based system

- Designed to reduce human error and organizational failure on the OCS
- Based on the framework of API RP 75
- Required under 30 CFR 250.1900 (Subpart S)
- Emphasizes Hazards Analysis, Mechanical Integrity, Operating Procedures, and Management of Change
- Operator – Contractor interface is crucial to this system
### SEMS – Important Dates

<table>
<thead>
<tr>
<th>Date Range</th>
<th>Description</th>
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<tbody>
<tr>
<td>1990’s – 2000’s</td>
<td>API RP 75 Published Promoted Voluntary Implementation</td>
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<td>2006 &amp; 2009</td>
<td>SEMS I Advanced Notice and Proposed</td>
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<td>2010</td>
<td>SEMS I Final Rule Published</td>
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<td>2011</td>
<td>SEMS II Proposed Comment Period</td>
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<tr>
<td>In Progress</td>
<td>First Audit Cycle in Progress SEMS II Final Rule</td>
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<tr>
<td>November 15, 2013</td>
<td>Deadline for First Cycle of SEMS Audits</td>
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SEMS Obligations

• Operators must
  • Document contractor selection criteria – performance evaluations
  • Ensure that contractors have their own written safe work practices.

• Contractors may adopt appropriate sections of Operator’s SEMS program.

• Operators and their contractor(s) must document an agreement on appropriate contractor safety and environmental policies and practices before the contractor begins work at their facilities.
SEMS II - Highlights

- JSA (modifications)
- Auditing Requirements
- Stop Work Authority
- Ultimate Work Authority
- Employee Participation Plan
- Reporting Unsafe Working Conditions
Conclusion

• First round of audits underway
  – BSEE is observing operator conducted audits
  – Anticipating varying degrees of SEMS implementation
  – Actively monitoring corrective actions

• Interface between contractor and operator is key

• Goals - continuous improvement of management systems, empowering employees, and fostering a culture of excellence

Don’t delay, audit deadline is November 15, 2013
THANK YOU

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