



Safety at All Levels, at All Times

BSEE Regulatory Viewpoint

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BSEE – Regulatory Viewpoint

- The Way Ahead
- Regulatory Update
- SEMS Highlights
- Conclusion



BSEE - The Way Ahead

Beyond Compliance to Offshore Excellence

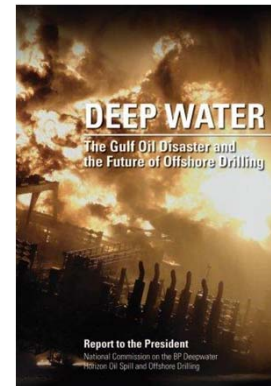
Strategies:

- 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**





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

1990's – 2000's	API RP 75 Published Promoted Voluntary Implementation
2006 & 2009	SEMS I Advanced Notice and Proposed
2010	SEMS I Final Rule Published
2011	SEMS II Proposed Comment Period
In Progress	First Audit Cycle in Progress SEMS II Final Rule
November 15, 2013	Deadline for First Cycle of SEMS Audits



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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