

Subpart O

GUIDANCE DOCUMENT



U. S. Department of the Interior
Minerals Management Service

Executive Summary

The purpose of this Guidance Document is to clarify Minerals Management Service (MMS) policy on how the agency implements the requirements of 30 CFR Part 250, Subpart O – Training. MMS views its involvement in overseeing the provisions in this regulation as critical in helping to assure the safety of outer continental shelf (OCS) oil and gas operations.

It is the hope of MMS that the information contained in this document will be used by companies working on the OCS in designing their well control and production safety system training plans. MMS will update this document as needed.

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Table of Contents

I)	Introduction.....	5
II)	Purpose.....	5
III)	Scope.....	5
A)	Audit Triggers.....	5
	1) Poor Performers.....	6
	2) Incidents That Have Training As a Root Cause	6
	3) Random Selection	6
B)	Audit Tools.....	6
	1) Formal Interview.....	6
	2) Training Plan Review.....	7
	3) Records Review.....	7
	4) Informal Employee Interview/Guidelines.....	8
	5) Course Evaluation.....	9
	6) Written Testing.....	10
	7) Hands-on Testing.....	11
C)	Audit Process.....	11
	1) Audit Team Selection.....	12
	2) Planning.....	12
	3) Preparation.....	12
	4) Audit Activities.....	12
IV)	Appendices.....	14
A)	MMS Letter to Schools.....	14
B)	Informal Employee Interview Form.....	15
C)	Final Subpart O Rule.....	16
D)	Well Control Drill Checklist	29
E)	Sample Letter of Compliance.....	25
F)	Subpart O PINC and Guidelines List	26
G)	Letter of Non-Compliance.....	33
H)	Audit Protocols Compliance Questionnaire	36

I. Introduction

Subpart O is MMS' first truly performance-based regulation. Since its effective date on October 15, 2002 it has had significant impact on MMS's regulatory program. The new rule eliminated the need for school certification and placed responsibility to develop and implement training programs with the lessee. It is less prescriptive than the old rule in that it does not set out specific requirements for the operator to follow in regards to the frequency, length, topics or methods of their training. The new rule also addresses contractors through the lessee-training plan.

II. Purpose

The major purpose of this document is to present consistent implementation practices to agency personnel involved in conducting Subpart O interviews, tests, audits and enforcement oversight. MMS guidance on how accredited Subpart O schools were affected by this rule is included in this document as Appendix A.

Regional and Headquarters personnel shall conduct activities under Subpart O using the audit triggers, tools, processes and practices presented in this document, in the federal waters regulated by the MMS. Activities under this rule are limited to personnel involved in well control and production safety system operations. Production safety system operations apply to those employees who oversee production operations as well as the employees who install, repair, test, maintain, or operate surface or subsurface safety devices. Well control related guidance applies to drilling, well completion, well workover and well servicing operations. Well completion/workover means those operations following the drilling of a well that are intended to establish or restore production to a well and includes small tubing operations but does not include well servicing. Well servicing means snubbing, coil tubing and wireline operations.

III. Scope

This section addresses auditing a lessee's training program and enforcement of 30 CFR 250 Subpart O. It covers the three sections of the audit: triggers, tools and process.

A. Audit Triggers

This section covers what triggers an audit. Once the need for an audit has been identified then an analysis of the company must be conducted to determine what tools you must use to implement the audit. Available tools are discussed in section B. Audits will be prioritized on the following criteria: poor performance, incidents with training as a root cause, and random selection.

1. Poor Performers

A list of all lessees conducting operations on the OCS will be compiled yearly by each Regional office by February 15th on a continuing basis and ranked based upon performance. Operator performance will be categorized by statistical analysis techniques. The operators with the poorest performance as characterized by these statistical techniques will be considered for an audit. Instead of choosing a predetermined percentage of operators to fall into the "poor" category, the Regions will locate a natural, distinct break in the distribution for use in determining poor performance.

Performance will be measured using compliance history and incident data. In addition, Informal Employee Interviews will also be used to help determine poor performance. Information on Informal Employee Interviews is included in B-4 of this Section.

Operator performance results will be submitted to the Office of Offshore Regulatory Programs (OORP) by February 15th of each year along with a schedule for conducting these audits.

2. Incidents That Have Training As A Root Cause

A Subpart O audit can be triggered by a single incident if the root-cause of the incident points to training as a major cause of the accident. In this case, the Region can decide to use the Subpart O audit as part of the accident investigation.

3. Random Selection

Lessees conducting operations on the OCS will be randomly selected for an audit by each Regional office by February 15th of each year. These audits are meant to obtain a reading on how the industry is doing as a whole in Federal waters. Random Selection audits will typically not be in-depth. Regional Random Selection audit lists will be submitted to the OORP by February 15th of each year along with a schedule for conducting these audits.

B. Audit Tools

Once the need for an audit has been determined the audit tools must be selected. MMS may decide to use one or any combination of the following tools: Formal Interview, Training Plan Review, Records Review, Informal Employee Interview, Course Evaluation, Written Testing, and Hands-on Testing.

1. Formal Interview

The Formal Interview is a more in-depth interview than the Informal Employee Interview. There is no fixed set of questions in the Formal Interview. The Formal Interview may be conducted either by phone, an

MMS visit to the company's offices, or the company representative may choose to visit the appropriate MMS Regional or District office. The Formal Interview will be used to gain sufficient information on a company's training program to make a determination on how that company is performing in relation to the provisions of Subpart O or to use as a basis for implementing additional audit tools. As part of the Formal Interview MMS may collect information concerning the location of the company's training plan and documentation, and the schedules of company personnel that MMS may want to interview, test, etc.

2. Training Plan Review

This is a review of the company's training plan to verify that it has an acceptable level of content as compared to the requirements in 30 CFR 250.1503(b) (Appendix C). Like other audit tools, this one can also be used to decide if another tool could be useful in determining if a company's training program is acceptable.

When reviewing a company's training plan use should be made of the Potential Incidents of Non-Compliance (PINC) List included in this document as Appendix F. As appropriate, Incidents of Non-Compliance (INC's) should be issued by the MMS representative(s) conducting the Training Plan Review.

INC's should be issued to the lead company representative in attendance during the review. Training Plan Review INC's should be entered into TIMS at the earliest possible time after the completion of the review following standard MMS procedures.

3. Records Review

A Records Review is used to ensure that the lessee's training plan is actually being implemented. As part of the Records Review, MMS representatives should verify that proper documentation is available to show that company personnel have actually completed the training specified in the training plan, and that the records are being maintained in accordance with the requirements in 30 CFR 250.1503(c) (Appendix C).

Examples of possible records a company may use as documentation during a Records Review include: training completion cards or certificates; time and attendance sheets; completed employee tests or worksheets; documentation concerning an employee's participation in hands-on drills, exercises, or on-the-job training activities. Other records that may be reviewed include contractor training program evaluations and contract employee verifications. These records may be in either electronic or paper formats. In accordance with the rule, these records are to be maintained for 5 years.

When conducting a Records Review use should be made of the PINC List included in this document as Appendix F. As appropriate, INC's should be issued by the MMS representative(s) conducting the Records Review. INC's should be issued to the lead company representative in attendance during the review. Records Review INC's should be entered into TIMS at the earliest possible time after the completion of the review following standard MMS procedures.

4. Informal Employee Interview/Guidelines

Informal Employee Interviews are to be conducted by the inspector when visiting an offshore facility. It is a way for the inspector to determine how well that facility is implementing its training program. After completing the Informal Employee Interview, the form attached in Appendix B should be completed. The Informal Employee Interview Form will be attached to the inspection form and then entered into TIMS following standard practices. The data can be used to conduct a basic type of analysis on the company. To ensure greater across the board consistency and accuracy of the data that will be entered into TIMS, the following guidelines are listed below to add clarification for the Inspectors when filling out the Informal Employee Interview Form:

a. IDENTIFICATION

Blocks A1 through A5 should contain the same information that is listed on the inspection form.

b. OPERATION

For Blocks B1 through B5 you should only circle the operation that pertains to the employee(s) you are interviewing (e.g., if the operation is Drilling then circle B1 Drilling only.)

c. EMPLOYEE INFORMATION

Blocks C1 through C3 should be filled in with information pertaining to the employees work history.

An example of the information that would be recorded in each block is given below:

C1 Years with present employer: [5 years] **C2 Years in present position:** [8 months]

C3 Total years of offshore experience: [10 years]

d. POSITION CLASSIFICATION

In this section you must circle the appropriate position of the employee that you are interviewing. For instance, if you were interviewing a Drilling Supervisor, you would circle Block D2 Drilling Supervisor on the form. During your inspection you may encounter a situation where a Drilling Floorhand may be acting for a Drilling Supervisor. In this case, you would circle Block D4 Floorhand Drilling to indicate his/her permanent position classification. Next you would include TA in the (D2) Drilling Supervisor block indicating a "Temporary Assignment." You would interview the employees' qualifications for both positions (Floorhand Drilling and Drilling Supervisor).

e. TRAINING

In this section circle the appropriate answer in the block that best fits the timeframe of when the employee last received relevant training (e.g., **Block E1 When did the employee last relevant training?** (a) Last 6 months).

MMS Inspectors should be aware that all answers given by an employee might not match the prerecorded answers provided on the interview form. An example might be:

Block E2 How often does the company provide training for the duties assigned?

- a. Every year b. Every 2 years c. Every 3 years d. Every 4 or more years

Employee's answer = Every 6 months

In this example the employee answered every 6 months. The MMS Inspector would simply record **"see comment section."** in the box and record the answer **Under Section F.**

f. INSPECTOR COMMENTS:

It is important to note that this section is reserved for Inspector Comments only.

If more room is needed for these comments please record these on the back of the Informal Employee Interview Form and write **"please see back of form for additional comments."**

This is probably the simplest, but at the same time the most important section on this form. At the completion of your Informal Employee Interview you must record an **"X"** on either the favorable or unfavorable line of this section.

This **X** will allow these reports to be queried in TIMS. This item reflects your overall view of the training of the employee you interviewed.

F1. Favorable X **F2. Unfavorable** _____

5. *Course Evaluation*

A Course Evaluation is used by MMS to review the course(s) that a company is using to fulfill its training requirements. MMS may review the materials used in the courses, observe the tests or hands-on exercises, evaluate computer based training software, or discuss items of interest with the instructor(s), training administrator(s) or employees. MMS may also attend the courses directly and witness the training in progress. If MMS attends a course, we can request a copy of the company training plan.

6. *Written Testing*

There are two types of written tests that can be administered during an audit. The RSOFO will decide which of these two options will be implemented. At no time will an individual be given both tests at the same time. Either test can be administered independently for test verification purposes.

The first type of test MMS can give is the company test as per the company-training plan. This test will be what the company administers to their employees for completion of their own training program guidelines. The second type of test MMS can give is the MMS-developed test.

Verbal or alternative tests can be administered by the MMS when these testing techniques are identified in the lessee's training plan as a requirement for certain employees. The decision to administer verbal or alternative testing will be at the discretion of the appropriate RSOFO.

When applicable, an individual will be allowed to use the following during the test: calculator, kill sheet, formula sheet, pipe data book and MMS regulations. Results from MMS-administered tests (either the company test or MMS's test), any verbal or alternative tests, will be shared with the individual and their company. The purpose of sharing test results with the lessees is to help them improve their program.

Prior to administering an MMS Written Test, the MMS representative tasked with giving the test will receive copies of the appropriate test (Well Control (WC) or Production) from the RSOFO designated Regional Test Administrator (RTA). The RTA will be responsible for coordinating the testing program within the region.

After completing a written test, the MMS representative responsible for the testing will grade and provide the employees with their test results. The graded written test will be sent to the OORP for entry into a stand-alone database. After receiving the graded test, the OORP will have 10 working days to enter the test information into a stand alone testing database for use in analyzing test data and sanitizing it prior to releasing the test results along with a cover letter to an individual company. OORP will provide written test data to the regions on a quarterly basis. The regions will also have access to the test database.

At no time will an MMS representative allow an MMS test to be released to the public. After completion of testing, ALL copies of the MMS Written Test should be promptly collected and stored in a suitable location prior to sending them to OORP for analysis. According to 30 CFR 250.1508, MMS has the authority to conduct written testing either onshore or offshore. MMS will do its best to minimize any adverse impacts on lessee's operations as a result of the test. The actual testing location will be determined by the RSOFO on a case-by-case basis.

7. Hands-on Testing

There are three types of hands-on evaluations that MMS may conduct: Simulator (WC or Production), Production Equipment, or Subpart D Well Control Drills. A Well Control Drill Check List is included in this document. The individual responsibilities shown in the table are representative of what must be done and the persons who typically performs the tasks during well control events. MMS and the industry should use this table as a tool to evaluate an employee's performance during well control drills – see Appendix D. According to 30 CFR 250.1507, MMS has the authority to conduct such testing either onshore or offshore. MMS will do its best to minimize any adverse impacts on a lessee's operations as a result of the test.

After completing a hands-on test, the MMS representative responsible for the testing will grade and provide the employees with their test results. The graded hands-on test will be sent to the OORP for entry into a stand-alone database within 10 working days. After receiving the graded test, OORP will have 10-working days to enter the test data into a stand-alone database for use in analyzing the data before releasing the test results along with a cover letter to an individual company. OORP will provide hands-on test data to the regions on a quarterly basis. The regions will also have access to the test database.

Hands-on tests can include the use of either computer based or mechanical equipment. If possible, the test will be conducted at the training or testing location identified in the lessee's training plan. If the lessee does not designate a place in their training plan then MMS will.

In an effort to minimize impacts on lessees as a result of hands-on testing either the RSOFO or the OORP will announce that MMS is going to conduct the test. This notification will include the date, time, and location of the test, the type of test to be conducted (WC or Production), and which type of employees MMS wants to test. This announcement will also explain what costs the lessee is responsible for paying as a result of this test and payment options.

According to 30 CFR 250.1509 (c), the lessee is responsible for all costs associated with Hands-on Testing except for MMS salary and travel. The lessee will also be responsible for paying for an MMS hired independent authorized representative, if required.

C. Audit Process

The audit protocols will be driven by the PINC inspection guidelines included in Appendix F. The Audit Protocols Compliance Questionnaire, which is included in this document in Appendix H, will be used by the MMS Auditor to determine the level of compliance as compared to the requirements in 30 CFR 250.1503(b). There are 4 parts to the process, as described in the following sections.

1. Audit Team Selection

The auditor(s) will be knowledgeable in the process to be reviewed during an audit and other specialties as deemed necessary. Examples of this would be appropriate knowledge in well control activities or production safety systems. The designated MMS lead auditor will be determined by the appropriate RSOFO, or the Chief, Office of Offshore Regulatory Programs (COORP) as needed. Once identified, the lead auditor will work with appropriate MMS personnel in forming the audit team.

2. Planning

Proper planning includes the development of an audit plan by the designated lead auditor. The details identified during the training plan review, course evaluation or records review will define the extent and formality of the audit plan. The planning process may encompass any one or a combination of the audit tools.

3. Preparation

The audit team will determine preparation for the audit. They will determine if information needs to be reviewed onsite versus offsite. The team will work on the logistics of how to address all of the areas that are being reviewed.

4. Audit Activities

First, the lessee will be notified at least 2 weeks in advance of the audit by a letter signed by the RSOFO or COORP.

Second, there will be an opening meeting with the lessee's management. This can be completed with a phone conversation. It will cover general questions such as where records are located, contacts, training facility locations, training material utilized and schedules. As part of this opening meeting, MMS will also layout the purpose and scope of the audit.

The next step is to review the training plan and gather data. MMS will review the plan elements and the content of each element. Then records will be verified to make sure that training is actually being conducted in accordance with the plan. MMS will then interview specific personnel to verify the validity of this data. If needed, MMS can then test the personnel to ensure they have the proper level of knowledge in their work area.

MMS will hold a closing meeting to discuss audit findings and enforcement actions. When no deficiencies are identified during the audit process a Letter of Compliance (Appendix E) will be issued stating that the training program is in accordance with 30 CFR 250 Subpart O. If it is not in compliance then INCs and a Letter of Non-Compliance (Appendix G) will be issued.

Appendix A

MMS Letter to Schools

17 August 2000

Dear Sir or Madam:

On August 15, under separate cover, I sent you a copy of the final regulations on 30 CFR 250, Subpart O, Well Control and Production Safety Training, that were published in the Federal Register (FR) on August 14, 2000 (65 FR 49485). Although the new regulations will take effect on October 13, 2000, they contain a provision (§ 250.1502) that provides lessees 2 years to implement the new regulations. The purpose of this letter is to clarify the Minerals Management Service (MMS) policy on the transition period from the current Subpart O regulations to the new regulations.

After the new regulations take effect on October 13, 2000, MMS will no longer be accrediting training schools or organizations. However, all training schools or organizations with valid MMS-accreditation will continue to be accredited until October 15, 2002, according to your training curriculum and plan as currently approved by MMS.

The new regulations (effective October 13, 2000) do not contain any provisions for MMS-accredited training schools or organizations to continue to retain or submit to MMS the information currently required under § 250.1517.

Thank you for having worked with us to maintain the safety of offshore oil and gas operations. Should you require additional information on this transition policy, please contact me at (703) 787-1033.

Sincerely,

Date: August 17, 2000

/signed/ Joseph R. Levine, Chief
Operations Analysis Branch

Appendix B

Inspector Name: _____

OMB Control Number: 1010-012

Inspector Number: _____

OMB Approval Expires: 8/31/2003

District Name: _____

Lease _____

Informal Employee Interview

The following questions are representative of those that will be asked during the interviews. The responses to some questions may lead to other questions. This form will be completed by the inspector conducting the interview.

A. IDENTIFICATION				
A1. FACILITY	A2. OPERATOR	A3. CONTRACTOR	A4. COMPLEX ID NO.	A5. RIG ID NO.
B. OPERATION				
B1. DRILLING	B2. COMPLETION	B3. WORKOVER	B4. WELL SERVICE	B5. PRODUCTION
C. EMPLOYEE INFORMATION				
C1. YEARS WITH PRESENT EMPLOYER		C2. YEARS IN PRESENT POSITION	C3. TOTAL YEARS OF OFFSHORE EXPERIENCE	
D. POSITION CLASSIFICATION				
D1. OPERATOR REPRESENTATIVE	D2. DRILLING SUPERVISOR	D3. WORKOVER SUPERVISOR		D4. FLOORHAND DRILLING
D5. FLOORHAND WORKOVER		D6. WELL SERVICE REPRESENTATIVE		D7. PRODUCTION SAFETY SYSTEMS TECHNICIAN
E. TRAINING				
E1. When did the employee last receive relevant training?	a. Last 6 months	b. 6-12 months	c. 13-24 months	d. 25-36 months
	e. 37-48 months	f. >48 months	g. No training	
E2. How often does the company provide training for the duties assigned?	a. Every year	b. Every 2 years	c. Every 3 years	d. Every 4 or more years
E3. Has employee received training for all duties assigned?	a. Yes	b. No		
E4. Does the employee perform jobs outside the scope of their training?	a. <25 % of time	b. 25-50% of time	c. 51-75% of time	d. >75% of time
E5. Has the employee received appropriate periodic training as job duties change?	a. Yes	b. No	c. N/A	
E6. Is the employee aware of the method to contact management about training needs?	a. Yes	a. No	c. Don't know	
E7. What is the employee's overall reaction to their companies training program?	a. Excellent	b. Adequate	c. Poor	
F. Inspector Comments:				
F1. Favorable ____ F2. Unfavorable ____				

Paperwork Reduction Act Statement of 1995 Statement: The Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.) requires us to inform you that Section 30 CFR 250.1507(b) authorizes us to conduct oral interviews of OCS employees. We use the information to ensure that workers in the OCS are properly trained with the necessary skills to perform your jobs in a safe and pollution-free manner. We are conducting this interview to evaluate the effectiveness of your company's training program and to verify training compliance with MMS regulations. We are not asking any questions of a proprietary or confidential nature. Your responses are mandatory. An agency may not conduct or sponsor, and you are not required to respond to, a collection of information unless it displays a currently valid Office of Management and Budget (OMB) control number. The OMB has approved this collection under OMB control number 1010-0128. We estimate the reporting burden for this interview to average 10 minutes per respondent. You may direct comments regarding the burden estimate or any other aspect of this interview to the Information Collection Clearance Officer, Mail Stop 4230, Minerals Management Service, Department of the Interior, 1849 C Street, N.W., Washington, DC 20240.

Appendix C

Appendix C

4310-MR-W

DEPARTMENT OF THE INTERIOR

Minerals Management Service

30 CFR Part 250
RIN 1010-AC41

Oil and Gas and Sulphur Operations in the Outer Continental Shelf—Subpart O—Well Control and Production Safety Training

AGENCY: Minerals Management Service (MMS), Interior.

ACTION: Final rule.

SUMMARY: This rule amends MMS regulations governing the training of lessee and contractor personnel engaged in oil and gas and sulphur operations in the OCS. MMS is making this amendment to enhance safety, allow the development of new and innovative training techniques, to impose fewer prescriptive requirements on the oil and gas industry, and provide increased training flexibility.

EFFECTIVE DATE: October 13, 2000

FOR FURTHER INFORMATION

CONTACT: Wilbon Rhome or Joseph Levine, Operations and Analysis Branch, at (703) 787-1032.

SUPPLEMENTARY INFORMATION: On April 20, 1999, we published the proposed rule in the *Federal Register* (64 FR 19318). During the 90-day comment period, which ended on July 19, 1999, MMS held a workshop.

Background

On February 5, 1997, we published a final rule in the *Federal Register* (62 FR 5320) concerning the training of lessee and contractor employees engaged in drilling, well completion, well workover, well servicing, or production safety system operations in the OCS. The final rule streamlined the previous regulations by 80 percent, provided the flexibility to use alternative training methods, and simplified the training options at 30 CFR 250, Subpart O--Training.

The February 5, 1997, final rule did not sufficiently address developing a performance-based training system, so we planned to publish a proposed rule to better address this issue. Before considering any further revisions to the rule, we decided to hold a workshop in Houston, Texas. The purpose of the workshop was to discuss the development of a performance-based training system for OCS oil and gas activities. On

April 4, 1997, we published a *Federal Register* notice (62 FR 18070) announcing the workshop. We stated that the goal of the meeting was to develop a procedure that ensures that lessee and contractor employees are trained in well control or production safety system operations by creating a less prescriptive training program, focusing on results and not on processes.

To improve the regulations at 30 CFR 250, Subpart O--Training, the workshop notice asked attendees to be prepared to present and discuss comments on the following four performance measures and indicators that could be used as part of a performance-based program:

- MMS Written Test;
- MMS Hands-On and Simulator Testing;
- Audits, Interviews, or Cooperative Reviews; and
- Incident of Noncompliance (INC), Civil Penalty, and Event Data.

On June 10, 1997, we conducted a public workshop in Houston, Texas, which received excellent participation from industry and training schools. Approximately 190 people attended the workshop, representing a diverse cross section of the oil and gas industry.

The next step in the development of a performance-based training system was accomplished by publishing a proposed rule on April 20, 1999. The rule focused on the development of a performance-based training program. The proposed rule required lessee and contractor employees to develop their own training programs tied to the job duties of their personnel. This final rule will primarily focus on training results rather than on the process by which employees are trained. By developing appropriate performance measures, MMS can evaluate the effectiveness of a lessee's training programs by:

- written testing;
- hands-on testing;
- training system audits; or
- employee interviews.

This approach requires lessees to be responsible for the quality and the level of training their employees receive.

Differences Between Proposed and Final Rules

In addition to the changes we made to the final rule in response to comments, we also reworded certain complex sections for further clarity. In many

instances, the changes improve MMS's internal work processes to better serve its external customers.

Following are the major changes by section.

- We replaced the tables in proposed § 250.1504. In the proposed rule, the tables listed the minimum "knowledge and job skill elements" employees must have to competently perform their assigned well control and production safety duties. The elements were far too prescriptive for a performance-based rule. The new 30 CFR § 250.1503(a) is more performance-based, stating that: "You" must establish and implement a training program so that all of your employees are trained to competently perform their assigned well control and production safety duties. The knowledge and job skill elements that an employee must possess in order to perform assigned well control or production safety duties are the responsibility of the lessee.
- We added § 250.1502, establishing a 2-year transition period to ensure a smooth transition from the existing rule to the new requirement.
- We deleted proposed § 250.1502(c) that stated that both lessees and contractors are required to develop training plans. We now specify that only lessees are required to develop a training plan.
- We modified proposed § 250.1503(b)(1) through (7) to add clarity and specificity so that lessees understand they are responsible for ensuring that all personnel working on their leases are trained and can competently perform their assigned well control or production safety duties. We also wanted contractors to understand that the lessees will review their training program for contract personnel.
- We replaced proposed § 250.1510 with § 250.1503(c). In proposed § 250.1510, we explained why it may be necessary for lessees to provide a training plan to the MMS. In § 250.1503(c), we describe what documentation the lessee must provide to MMS upon request of the Regional or District Supervisor.
- We deleted proposed § 250.1512 and moved the requirements to § 250.1509 in the final rule. Under the current system, MMS-approved training schools conduct hands-on, simulator,

or other types of testing that must be passed by the employees before they can work on the OCS. Under the final rule, § 250.1509 outlines the requirements involved if MMS

conducts, or requires the lessees to conduct, these tests. We are changing the requirement in the proposed rule that the lessees pay

all costs associated with testing. This final rule specifies

that the lessees are responsible for paying the testing costs, excluding salary and travel costs for MMS personnel.

Response to Comments

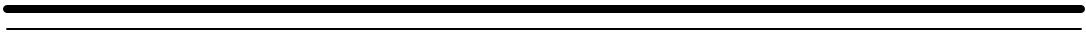
MMS received 25 comments on the proposed rule. The comments were received from six production operators, six drilling contractors, two trade organizations, one standard setting organization, nine training schools, and one congressional office. We reviewed all the comments and, in some instances, we revised the final language based on these comments. MMS grouped the major comments and organized them by the proposed regulation section number or subject, as highlighted in the comment table.

COMMENT TABLE

Requirement/Proposed rule	Comment	MMS response
Preamble.....	The transition period is inadequate. Lessees will not be able to implement a satisfactory program within a 90-day timeframe.	Agree—MMS added a section establishing a 2-year transition period to ensure the smoothest transition from the existing rule to the new requirement. New 30 CFR 150.1502.
Preamble	The stated training plan development time of 2.2 hours is an understatement.	Agree—We noted and corrected. Plan development time averages 40-60 hours.
§ 250.1501.....	MMS should delete the requirement “experienced,” as this would preclude “new hire employees.” The word “experienced” does not necessarily relate to “competent,” which is the primary goal of MMS’ training program.	Agree—We deleted the requirement “experienced.”
§ 250.1502	Several commenters stated that contractors would need to assure each individual lessee they work for that their personnel have been trained according to the specific program requirements that have been developed by that lessee. Contractors may have to modify their program to fit each lessee’s definition of an acceptable program, possibly requiring the contractor to alter its training program every time a rig changes to a different customer.	Agree—Contractors may have to address the lessees’ training plans. These differences may exist regardless of the system that is in place. It is the responsibility of the lessees to ensure that those differences do not impact the safety of operations.
§ 250.1502	Several commenters asked for clarification concerning which personnel are to be trained. The expanded scope of the rule from the prior regulations seems to imply that the catering staff, marine, helicopter, and other nonessential third-party “contract or” personnel must also be trained by the lessee.	Agree—MMS did not mean to imply that catering staff, marine, helicopter and other nonessential third-party “contractor” personnel be trained by the lessee. According to this rule, only personnel engaged in well control or production safety operations must be trained.
§ 250.1502.....	One commenter wanted MMS to remove the requirement that hot tapping practices and procedures be included in the lessee’s training plan.	Agree—The focus of this rule has been limited to well control and production safety training.
§ 250.1502(a)	MMS’ current prescriptive training requirements should be maintained.	Disagree—MMS believes lessees should be responsible for developing procedures that ensure their workers are properly trained prior to working on the OCS rather than having MMS prescribe them.
§ 250.1502(c).....	One commenter stated that MMS should clarify if both lessees and contractors are required to develop training plans.	Agree—We now specify that lessees are required to develop a training plan. Lessees will be responsible for ensuring that all personnel working on their leases are trained and can competently perform their assigned well control or production safety duties. New 30 CFR 250.1503.
§ 250.1502(c).....	A 5-year record retention requirement for documentation for all employees is costly and unwarranted.	Disagree—MMS may need at least 5 years of training records to make an assessment of your training program and look at safety trends. New 30 CFR 250.1503(c)(1).
§ 250.1504.....	Several commenters suggested that the knowledge and job skill elements included in the tables are far too prescriptive for a rule that MMS intends to be “performance-based.”	Agree—MMS believes that the tables are too prescriptive for a performance-based rule. We have elected to delete the tables.
§ 250.1509.....	Clarify that employee needs to be kept current on information related to his or her particular job.	Agree—Wording has been changed to reflect periodic training of employees in relation to their specific job. New 30 CFR 250.1506.

COMMENT TABLE – Continued

Requirement/Proposed rule	Comment	MMS response
§ 250.1510.....	Several commenters pointed out that the proposed rule does not contain requirements regarding course duration, class size, or periodic retraining. Some in industry may take this as a sign to extend the training frequency of their employees from 2 to 6 years, or to reduce well control certification to a one-time course and test.	Disagree--As part of the final rule, lessees will be required to develop a training plan defining their program. Minimum information to be included in the plan is included in the final rule. MMS will monitor company training programs to determine their effectiveness. New 30 CFR 250.1503.
§ 250.1510(b)(3).....	Several commenters urged MMS not to use written tests as an indicator of an employee's competency or the effectiveness of an employee's training, and one commenter stated that tests should be administered orally because many offshore workers have difficulty reading regulations or company operating manuals.	Agree in part--MMS realizes that failing a written test does not mean an employee does not know his or her job. A written test is one of the many tools MMS may use in assessing the performance of a company's training program. MMS may elect to conduct oral tests according to the lessee's training plan. New CFR 250.1508(a).
§ 250.1512.....	Several commenters stated the requirements for hands-on, simulator, or other types of testing will cause a disruption in operations if conducted offshore. This type of testing will not provide a valid indicator of the lessee's performance or the effectiveness of its training program.	Disagree--Whenever possible, MMS will try to accommodate this concern and minimize any potential disruptions. However, to assist in addressing personnel competency, hands-on, simulator, or other types of testing may be conducted in an offshore environment. Therefore, we retained the option for either onshore or offshore testing. New CFR 250.1507(d).
§ 250.1512.....	Several commenters stated that MMS should delete the requirement that lessees and contractors pay for all costs associated with hands-on, simulator, or other types of testing.	Disagree--MMS may use hands-on, simulator, or other types of tests as a method for evaluating the effectiveness of a training program. Whenever possible, MMS will make efforts to minimize costs associated with testing. The final rule clarifies that lessees will not be responsible for paying the salary and travel costs of MMS personnel. New 30 CFR 250.1507(d).
§ 250.1512.....	Several commenters stated that MMS should not use an authorized representative to administer or witness MMS hands-on, simulator, or live well testing. They believe that MMS should bear the burden of guaranteeing impartiality and controlling costs during these tests.	Disagree--MMS does not have the equipment or expertise to conduct hands-on, simulator, or live well testing. For that reason, the final rule includes a provision that either the MMS or its authorized representative would administer or witness the testing if we find it necessary. New CFR 250.1509(a).
Testing-out.....	One commenter urged MMS not to move in the direction of testing-out, especially in positions critical to operational safety, such as well control.	Disagree--MMS and much of industry sees value in training, even for advanced employees who can pass the test. However, under a performance-based system, certain lessees may choose to implement the testing-out options for some of their personnel. MMS will measure these results according to the requirements in § 250.1507 to ensure the competency of these employees.
General.....	One commenter stated that statistics on incidents in OCS waters overwhelmingly support the success of MMS' current training program. With today's environment in the oil and gas industry, this is not the time to experiment with a new type of training regulation.	Disagree--MMS believes that this final rule provides companies the opportunity to develop their own programs tailored to the needs of their employees. The changes in the final rule are expected to decrease incidents and improve company performance by holding lessees accountable for the competency of their employees.
Well CAP.....	Several commenters stated that MMS should consider referencing the International Association of Drilling Contractors (IADC) WellCAP training program, or its associated documents in the final rule. WellCAP is	Agree--MMS commends IADC for the WellCAP program and acknowledges the value WellCAP could bring in providing minimum well control training requirements to lessees and contractors



PROCEDURAL MATTERS:

Regulatory Planning and Review (Executive Order 12866)

This document is a significant rule and is subject to review by the Office of Management and Budget (OMB) under Executive Order 12866.

(1) This rule will not have an effect of \$100 million or more on the economy. It will not adversely affect in a material way the economy, productivity, competition, jobs, the environment, public health or safety, or State, local, or tribal governments or communities. The rule does not add any new cost to the oil and gas industry, and it will not reduce the level of safety to personnel or the environment.

(2) This rule will not create a serious inconsistency or otherwise interfere with an action taken or planned by another agency. The Department of the Interior (DOI) has several Memoranda of Understanding (MOUs) with the U.S. Coast Guard that define the responsibilities of each agency with respect to activities on the OCS. The MOUs are effective in avoiding inconsistency or interfering with any action taken by another agency.

(3) This rule does not alter the budgetary effects or entitlements, grants, user fees, or loan programs or the rights or obligations of their recipients. This rule will not affect programs such as listed here. This is a training rule that applies to the lessees working on the OCS. There are no entitlements, grants, or user fees that apply.

(4) Although moving towards performance-based rules is a fairly new concept, this rulemaking will not raise any legal issues. However, there may be certain novel policy issues to consider, thus, this rule is significant and is subject to review by OMB. We held a public workshop before proposing this change.

Federalism (Executive Order 13132)

According to Executive Order 13132, this rule does not have Federalism implications. This rule does not substantially and directly affect the relationship between the Federal and State governments. This is a training rule that applies to lessees working on the OCS and amends current MMS regulations to provide increased training flexibility. Thus, this rule will not directly affect the relationship between the Federal and State Governments. This rule does not impose costs on State or localities because the rule applies only to the lessees working on the OCS.

Civil Justice Reform (Executive Order 12988)

According to Executive Order 12988, the Office of the Solicitor has determined that this rule does not unduly burden the judicial system and meets the requirements of sections 3(a) and 3(b)(2) of the Order.

Small Business Regulatory Enforcement Fairness Act (SBREFA)

This rule is not a major rule under (5 U.S.C. 804(2)) SBREFA. This rule:

(a) Does not have an annual effect on the economy of \$100 million or more. The estimated yearly gross cost to the oil and gas industry to train its employees is \$5,945,250. Based on a 12-year cycle, well-control students would normally take six basic courses (1/2 course per year), and production safety system students would take four basic courses (1/3 course per year). Therefore, the annual training cost to train 15,000 students in well control would be \$3,975,000 (\$530 x 1/2 course per year x 15,000 students). The annual training cost to train 15,000 students in a production safety system would be \$1,955,250 (\$395 x 1/3 course per year x 15,000 students). The total annual cost is \$5,930,250. There may be additional costs to the lessees or contractors with poor performance records if MMS or its authorized representative conducts, or requires the lessee or contractor to conduct hands-on, simulator, or other types of testing. They will be required to pay for all costs associated with the testing, excluding salary and travel costs for MMS personnel.

We estimate that not more than 50 employees (industry-wide) per year, at a cost of \$300 per employee, will be required to take the MMS hands-on, simulator, or other types of testing. The total cost for those employees should not exceed \$15,000 per year.

We feel that the cost of complying with the final rule would be somewhat less than this amount.

(b) Will not cause a major increase in costs or prices for consumers, individual industries, Federal, State, or local government agencies, or geographic regions. Based on our experience, the training industry should not change significantly under a performance-based system. Because of lower overhead and competitive pricing in the industry, costs should remain stable; and

(c) Does not have significant adverse effects on competition, employment, investment, productivity, innovation, or ability of United States-based enterprises to compete with foreign-based enterprises.

Unfunded Mandates Reform Act (UMRA) of 1995 (Executive Order 12866)

This rule does not impose an unfunded mandate on State, local, or tribal governments or the private sector of more than \$100 million per year. The rule does not have a significant or unique effect on State, local, or tribal governments or the private sector. A statement containing the information required by the UMRA (2 U.S.C. 1531 *et seq.*) is not required.

Paperwork Reduction Act (PRA) of 1995

We examined the proposed rule and these final regulations under section 3507(d) of the PRA. Because of the changes proposed to the current 30 CFR 250, Subpart O regulations, we submitted the information collection requirements to OMB for approval as part of the proposed rulemaking process. As the final rule contains minor changes in the collection of information, before publication, we again submitted the information collection to OMB for approval. In response to comments, we concluded that we significantly underestimated the burden for the primary paperwork aspect of the rule that requires lessees to develop "training plans" (§ 250.1503(b) and (c)). In our resubmission to OMB, the burden for this requirement is 60 hours per plan. The following two new requirements (associated hour burden is shown in parenthesis) are the only differences in the information collected under the final rule from that approved for the proposed rule:

? § 1502--Notify MMS if lessees implement the revised final regulations before the end of the 2-year transition period (1 hour).

? § 1503(c)--Provide copies of the training plan to MMS, if requested (5 hours).

The PRA provides that an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. OMB has approved the collection of information required in the final rule under OMB control number 1010-0128.

The title of this collection of information was changed to "30 CFR 250, Subpart O Well Control and Production Safety Training" to correspond with the revised title of the subpart. Responses are mandatory. The frequency of submission varies according to the requirement but is generally "on occasion." We estimate

there are approximately 130 respondents to this collection of information required by these regulations to ensure that workers in the OCS are properly trained with the necessary skills to perform their jobs in a safe and pollution-free manner. In some instances, MMS will conduct oral interviews of offshore employees to evaluate the effectiveness of a company's training program. This information is necessary to verify training compliance with the requirements.

Reporting and Recordkeeping "Hour" Burden: The approved annual burden of this collection of information is 5,739 hours. Based on \$50 per hour, we estimate the total "hour" burden cost to respondents to be \$286,950.

Reporting and Recordkeeping "Non-Hour Cost" Burden: There are no "non-hour cost" burdens in the final regulations.

It should be noted that this final rule will not take full effect for 2 years from the effective date of the rule, but it allows for early implementation at the discretion of lessees. Therefore, we will continue to maintain approved information collections for the current Subpart O regulations (under OMB control number 1010-0078) as well as for these final regulations during the transition period.

Regulatory Flexibility (RF) Act

DOI certifies that this document will not have a significant economic effect on a substantial number of small entities under the RF Act (5 U.S.C. 601 *et seq.*). The Small Business Administration (SBA) defines a small business as having:

- Annual revenues of \$5 million or less for exploration service and field service companies; and
- Fewer than 500 employees for drilling companies and for companies that extract oil, gas, or natural gas liquids.

Under SBA's Standard Industrial Classification (SIC) code 1381, Drilling Oil and Gas Wells, MMS estimates that there is a total of 1,380 firms that drill oil and gas wells onshore and offshore. Of these, approximately 130 companies are offshore lessees/operators, based on current estimates. According to SBA estimates, 39 companies qualify as large firms, leaving 91 companies qualified as small firms with fewer than 500 employees. As explained in the PRA section, companies will be required to develop training plans. We estimate that the burden for developing these plans is approximately 60 hours each. If 91

lessees are small businesses, the burden would be 5,460 hours. At an average hourly cost of \$50, the impact of this requirement is \$273,000 on small businesses. Once the plan has been developed, there are no new costs for implementation.

The costs for an alternative training program would simply offset the current cost of sending employees to accredited schools. Alternative training provides both added flexibility and cost savings for companies who train their employees either onshore or offshore, at a centralized location, or during their off hours on a platform or drilling rig. It is expected that they would receive the same quality of training that they have been receiving for years. We estimate that the company may spend 5-10 (\$250-\$500) hours annually to update the plans. Thus, the annual cost for updating plans for small businesses is approximately \$22,750 to \$45,500. The cost for this update will be minimal.

A positive effect for the lessees under the new rule is that they will have increased options concerning where to get their training. This will change how a company does business. This should not result in any additional training costs or economic burdens. Under the final rule, the oil and gas industry will have the flexibility to tailor its training program to the specific needs of each company. Lessees will be given the added flexibility to determine the type of training, methodology (classroom, computer, team, on-the-job), length of training, frequency and subject matter content for their training program.

In addition to lessees, MMS currently regulates the training schools. There are 52 MMS-accredited training schools. We have approved 26 schools to teach production safety courses, 22 schools to teach well control courses, and 4 schools to teach both well control and production courses. The training companies best fit under the SIC 8249, and the criterion for small businesses is \$5 million in revenue. Based on this criterion, 25 training companies will fall into the small business category.

Under these final regulations, we will no longer be accrediting training schools or imposing any regulatory burden. However, lessee personnel and the employees of contractors hired by the lessee will have to be trained and found competent in the duties associated with

their particular job. Training schools that teach a broad range of vocational courses, in addition to MMS accreditation courses, and who provide quality training at a competitive price, should experience no significant change in their normal business, except the schools will no longer be burdened with MMS reporting and recordkeeping requirements.

- 18 -

Training schools that were previously MMS-accredited will benefit because their plans are in place and approved by MMS. Additionally, schools that have established a loyal customer-base will not be affected by the implementation of this rule. Therefore, this new provision will not cause prices to increase or decrease. Based on our experience, the failure rate of the schools in the offshore training industry should not change significantly under a performance-based program. Under the current regulations, we maintain a database that tracks training schools approved by the agency. Based on information from this database, less than 2 percent of the schools approved by MMS go out of business each year. Under the new rule, we expect this to remain the same. MMS experience has shown that because of lower overhead and competitive pricing, small training schools are just as capable as the larger schools at adapting to change.

Your comments are important. The Small Business and Agriculture Regulatory Enforcement Ombudsman and 10 Regional Fairness Boards were established to receive comments from small business about Federal agency enforcement actions. The Ombudsman will annually evaluate the enforcement activities and rate each agency's responsiveness to small business. If you wish to comment on the enforcement actions of MMS, call toll-free (888) 734-3247.

Takings Implication Assessment (Executive Order 12630)

According to Executive Order 12630, the rule does not have significant takings implications. MMS determined that this rule does not represent a governmental action capable of interference with constitutionally protected property rights. Thus, a Takings Implication Assessment is not required under Executive Order 12630, Governmental Actions and Interference with Constitutionally Protected Property Rights.

*National Environmental Policy Act
(NEPA) of 1969*

This rule does not constitute a major Federal action significantly affecting the quality of the human environment. A detailed statement under the NEPA is not required.

List of Subjects in 30 CFR Part 250

Continental shelf, Environmental impact statements, Environmental protection, Government contracts, Investigations, Mineral royalties, Oil and gas development and production, Oil and gas exploration, Oil and gas

reserves, Penalties, Pipelines, Public lands--mineral resources, Public lands--rights-of-way, Reporting and record-keeping requirements, Sulphur development and production, Sulphur exploration, Surety bonds.

Dated: July 14, 2000

Sylvia V. Baca,

Assistant Secretary, Land and Minerals Management

For the reasons stated in the preamble, MMS amends 30 CFR part 250 as follows:

PART 250-OIL AND GAS AND SULPHUR OPERATIONS IN THE OUTER CONTINENTAL SHELF

1. The authority citation for part 250 continues to read as follows:

Authority: 43 U.S.C. 1331 *et seq.*

2. Subpart O is revised to read as follows:

Subpart O-Well Control and Production Safety Training

Sec.

250.1500 Definitions.

250.1501 What is the goal of my training program?

250.1502 Is there a transition period for complying with the regulations in this subpart?

250.1503 What are my general responsibilities for training?

250.1504 May I use alternative training methods?

250.1505 Where may I get training for my employees?

250.1506 How often must I train my employees?

250.1507 How will MMS measure training results?

250.1508 What must I do when MMS administers written or oral tests?

250.1509 What must I do when MMS administers or requires hands-on, simulator, or other types of testing?

250.1510 What will MMS do if my training program does not comply with this subpart?

§ 250.1500 Definitions.

Terms used in this subpart have the following meaning:

Employee means direct employees of the lessees who are assigned well control or production safety duties.

I or you means the lessee engaged in oil, gas, or sulphur operations in the Outer Continental Shelf (OCS).

Lessee means a person who has entered into a lease with the United States to explore for, develop, and produce the leased minerals. The term lessee also includes an owner of operating rights for that lease and the MMS-approved assignee of that lease.

Production safety means production operations as well as the installation, repair, testing, maintenance, or operation

of surface or subsurface safety devices.

Well control means drilling, well completion, well workover, and well servicing operations. For purposes of this subpart, well completion/well workover means those operations following the drilling of a well that are intended to establish or restore production to a well. It includes small tubing operations but does not include well servicing. Well servicing means snubbing, coil tubing, and wireline operations.

§ 250.1501 What is the goal of my training program?

The goal of your training program must be safe and clean OCS operations. To accomplish this, you must ensure that your employees and contract personnel engaged in well control or production safety operations understand and can properly perform their duties.

§ 250.1502 Is there a transition period for complying with the regulations in this subpart?

(a) During the period October 13, 2000 until October 15, 2002 you may either:

(1) Comply with the provisions of this subpart. If you elect to do so, you must notify the Regional Supervisor; or

(2) Comply with the training regulations in 30 CFR 250.1501 through 250.1524 that were in effect on June 1, 2000 and are contained in the 30 CFR, parts 200 to 699, edition revised as of July 1, 1999, as amended on December 28, 1999 (64 FR 72794).

(b) After October 15, 2002, you must comply with the provisions of this subpart.

§ 250.1503 What are my general responsibilities for training?

(a) You must establish and implement a training program so that all of your employees are trained to competently perform their assigned well control and production safety duties. You must verify that your employees understand and can perform the assigned well control or production safety duties.

(b) You must have a training plan that specifies the type, method(s), length, frequency, and content of the training for your employees. Your training plan must specify the method(s) of verifying employee understanding and performance. This plan must include at least the following information:

(1) Procedures for training employees in well control or production safety practices;

(2) Procedures for evaluating the training programs of your contractors;

(3) Procedures for verifying that all employees and contractor personnel engaged in well control or production safety operations can perform their assigned duties;

(4) Procedures for assessing the training needs of your employees on a periodic basis;

(5) Recordkeeping and documentation procedures; and

(6) Internal audit procedures.

(c) Upon request of the Regional or District Supervisor, you must provide:

(1) Copies of training documentation for personnel involved in well control or production safety operations during the past 5 years; and

(2) A copy of your training plan.

§ 250.1504 May I use alternative training methods?

You may use alternative training methods. These methods may include computer-based learning, films, or their equivalents. This training should be reinforced by appropriate demonstrations and "hands-on" training. Alternative training methods must be conducted according to, and meet the objectives of, your training plan.

§ 250.1505 Where may I get training for my employees?

You may get training from any source that meets the requirements of your training plan.

§ 250.1506 How often must I train my employees?

You determine the frequency of the training you provide your employees.

You must do all of the following:

(a) Provide periodic training to ensure that employees maintain understanding of, and competency in, well control or production safety practices;

(b) Establish procedures to verify adequate retention of the knowledge and skills that employees need to perform their assigned well control or production safety duties; and

(c) Ensure that your contractors' training programs provide for periodic training and verification of well control or production safety knowledge and skills.

§ 250.1507 How will MMS measure training results?

MMS may periodically assess your training program, using one or more of the methods in this section.

(a) *Training system audit.* MMS or its authorized representative may conduct a training system audit at your office. The training system audit will compare your training program against this subpart. You must be prepared to explain your overall training program and produce evidence to support your explanation.

(b) *Employee or contract personnel interviews.* MMS or its authorized representative may conduct interviews at either onshore or offshore locations to inquire about the types of training that were provided, when and where this training was conducted, and how effective the training was.

(c) *Employee or contract personnel testing.* MMS or its authorized representative may conduct testing at either onshore or offshore locations for the purpose of evaluating an individual's knowledge and skills in perfecting well control and production safety duties.

(d) *Hands-on production safety, simulator, or live well testing.* MMS or its authorized representative may conduct tests at either onshore or offshore locations. Tests will be designed to evaluate the competency of your employees or contract personnel in performing their assigned well control and production safety duties. You are responsible for the costs associated with this testing, excluding salary and travel costs for MMS personnel.

§ 250.1508 What must I do when MMS administers written or oral tests?

MMS or its authorized representative may test your employees or contract personnel at your worksite or at an onshore location. You and your contractors must:

- (a) Allow MMS or its authorized representative to administer written or oral tests; and
- (b) Identify personnel by current position, years of experience in present position, years of total oil field experience, and employer's name (e.g., operator, contractor, or sub-contractor company name).

§ 250.1509 What must I do when MMS administers or requires hands-on, simulator, or other types of testing?

If MMS or its authorized representative conducts, or requires you or your contractor to conduct hands-on, simulator, or other types of testing, you must:

- (a) Allow MMS or its authorized representative to administer or witness the testing;
- (b) Identify personnel by current position, years of experience in present position, years of total oil field experience, and employer's name (e.g., operator, contractor, or sub-contractor company name); and
- (c) Pay for all costs associated with the testing, excluding salary and travel costs for MMS personnel.

§ 250.1510 What will MMS do if my training program does not comply with this subpart?

If MMS determines that your training program is not in compliance, we may initiate one or more of the following enforcement actions:

- (a) Issue an Incident of Noncompliance (INC);
- (b) Require you to revise and submit to MMS your training plan to address identified deficiencies;
- (c) Assess civil/criminal penalties; or
- (d) Initiate disqualification procedures.

[FR Doc. 00—20352 Filed 8-11-00; 8:45 am]

BILLING CODE 4310-MR-P

Appendix D

Well Control Drill Checklist

Employees name: _____

Date of Drill: _____

Employees JobTitle: _____ Employer: _____

Yrs. of Exp. in Curr. Job: _____

Type of Drill: Drilling Surface Well Completion/Workover Total Time for Entire Crew to Complete Drill: : _____
 Drilling Subsea Well Servicing

Operating Company: _____ Contracting Company: _____

Location of Drill: Onshore: _____
 Offshore: Rig: _____ Area: _____ Block: _____ Lease: _____
 Announced: Unannounced:

MMS or MMS Authorized Representative(s) Conducting Drill: _____

Tasks performed during well control drills	Driller	Toolpusher	Co. Rep	Derrickhand/ Asst Driller	Rough neck	Mud Engineer	Motorman	Cementer	Subsea Engineer	Service Personnel
Primary responsibility is kick detection and verification	✓									
Shut in the well	✓									
Notify supervisor	✓									
Organize crew for kill operation	✓									
Remains at drilling console to run rig and rig pump during kill operation	✓									
Responsible for rig and personnel		✓								
Verifies proper on and off tour crew deployment, notifies barge engineer or vessel captain of well control operations		✓								
May be responsible for operating the choke or to designate choke operator		✓								

Tasks performed during well control drills	Driller	Toolpusher	Co. Rep	Derrickhand/ Asst Driller	Rough neck	Mud Engineer	Motorman	Cementer	Subsea Engineer	Service Personnel
Coordinates kill operation with company representative		✓								
Organizes kill operation			✓							
Has overall responsibility unless rig has offshore installation manager (OIM)			✓							
Briefs crew, oversees operations and makes sure crew knows their responsibilities			✓							
Notifies and keeps communications open with office			✓							
May be responsible for operating the choke or designating a choke operator			✓							
Goes to pit area, aligns gas separator, degasser and pits				✓						
Works with mud engineer to supervise mixing crew and to ensure rig and mixing pumps are functioning and aligned properly				✓						
Report to assigned well control station (rig floor, pumproom, choke console, etc.)					✓					
Follow instructions of driller					✓					
Goes to pits						✓				
Supervises weighting operations						✓				
Maintains constant properties and fluid density						✓				
Maintains constant properties and fluid density						✓				

Tasks performed during well control drills	Driller	Toolpusher	Co. Rep	Derrickhand/ Asst Driller	Rough neck	Mud Engineer	Motorman	Cementer	Subsea Engineer	Service Personnel
Shuts off all non-essential equipment							✓			
Ensures rig power throughout operation							✓			
Goes to assigned station for well control operations							✓			
Stands by for orders and to shut down rig							✓			
Reports to cement unit								✓		
Lines up cement pumps								✓		
Stands by for orders								✓		
Reports to rig floor to inspect subsea panel									✓	✓
Checks for possible problems									✓	✓
Stands by for orders from rig manager									✓	✓
Go to assigned stations for well control operations										v
Stand by for orders										v

Inspector comments:

Appendix E

Sample Letter of Compliance

Current Date

Mr. John Brown
Alright Productions
Houston, Tx. 11111

Dear Sir or Madam:

On (date) , the Minerals Management Service conducted an audit of your Subpart O Training Program. This audit was conducted at (location) and included the following individuals:

Company Representatives

Cecile R. Smith
Harry Jones
Bob Smith

MMS Representatives

Mr. Headquarters
Mr. GOMR
Mr. POCS
Mr. AKOCS

This audit identified no deficiencies in your training program, and MMS considers your training program to be in accordance with 30 CFR 250 Subpart O regulations.

Sincerely,

RSOFO's Signature
or
C/EOD Signature

Appendix F

SUBPART O PINC AND GUIDELINES LIST

TRAINING

- G-841** **HAS A WELL-CONTROL AND PRODUCTION SAFETY TRAINING PROGRAM BEEN ESTABLISHED AND IMPLEMENTED?**
Authority: 30 CFR 250.1503(a) **Enforcement Action:** S
INSPECTION PROCEDURE:
Verify that the lessee has established and implemented a training program.
IF NONCOMPLIANCE EXISTS:
Issue one facility shut -in (S) INC for an audit of a lessee's training program if the training program for well-control and production safety duties is not established and implemented.
Note: The one or more affected facilities of the lessee is the facility.
- G-842** **CAN THE LESSEE EXPLAIN ITS OVERALL WELL-CONTROL AND PRODUCTION SAFETY TRAINING PROGRAM AND PRODUCE EVIDENCE TO SUPPORT THE EXPLANATION DURING A TRAINING SYSTEM AUDIT CONDUCTED BY THE MMS OR ITS AUTHORIZED REPRESENTATIVE?**
Authority: 30 CFR 250.1507(a) **Enforcement Action:** W
INSPECTION PROCEDURE:
Verify during audit that the lessee can explain its overall training program and produce evidence to support the explanation.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for a training system audit if the lessee cannot explain its overall training program and produce evidence to support the explanation.
- G-843** **DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR TRAINING EMPLOYEES IN WELL-CONTROL OR PRODUCTION SAFETY PRACTICES?**
Authority: 30 CFR 250.1503(b)(1) **Enforcement Action:** W
INSPECTION PROCEDURE:
Verify that lessee's training plan includes procedures for training employees in well-control and production safety practices.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for training employees in well-control or production safety practices.
- G-844** **DOES THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING PLAN SPECIFY THE TYPE, METHOD(S), LENGTH, FREQUENCY, AND CONTENT OF THE TRAINING FOR EMPLOYEES?**
Authority: 30 CFR 250.1503(b) **Enforcement Action:** W
INSPECTION PROCEDURE:
Verify that lessee's training plan specifies the type, method(s), length, frequency, and content of the training for employees.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to specify the type, method(s), length, frequency, and content of the training for employees.

- G-845** **DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR ASSESSING THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING NEEDS OF EMPLOYEES ON A PERIODIC BASIS?**
Authority: 30 CFR 250.1503(b)(4) **Enforcement Action:** W
INSPECTION PROCEDURE:
Verify that lessee's training plan includes procedures for assessing the training needs of employees on a periodic basis.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for assessing the training needs of employees on a periodic basis.
- G-846** **DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR EVALUATING THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING PROGRAMS OF CONTRACTORS?**
Authority: 30 CFR 250.1503(b)(2) **Enforcement Action:** W
INSPECTION PROCEDURE:
Verify that lessee's training plan includes procedures for evaluating the training programs of contractors.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for evaluating the training programs of contractors.
- G-847** **DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR INTERNAL AUDITS?**
Authority: 30 CFR 250.1503(b)(6) **Enforcement Action:** W
INSPECTION PROCEDURE:
Verify that lessee's training plan includes procedures for internal audits.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for internal audits.
- G-848** **DOES THE LESSEE PROVIDE A COPY OF ITS TRAINING PLAN WHEN REQUESTED BY THE MMS REGIONAL OR DISTRICT SUPERVISOR?**
Authority: 30 CFR 250.1503(c)(2) **Enforcement Action:** S
INSPECTION PROCEDURE:
Verify that a training plan was provided when requested by the MMS Regional or District Supervisor.
IF NONCOMPLIANCE EXISTS:
Issue one facilities shut-in (S) INC for an audit of a lessee's training program if the lessee fails to provide the training plan when requested by the MMS Regional or District Supervisor.
Note: The one or more affected facilities is the facility.
- G-849** **DOES THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING PLAN SPECIFY THE METHOD(S) OF VERIFYING EMPLOYEES' UNDERSTANDING AND PERFORMANCE?**
Authority: 30 CFR 250.1503(b) **Enforcement Action:** W
INSPECTION PROCEDURE:
Verify that lessee's training plan specifies the method(s) of verifying employees' understanding and performance.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to specify the method(s) of verifying employees' understanding and performance.

- G-850** **ARE PROCEDURES ESTABLISHED TO VERIFY ADEQUATE RETENTION OF THE KNOWLEDGE AND SKILLS THAT EMPLOYEES NEED TO PERFORM THEIR ASSIGNED WELL-CONTROL OR PRODUCTION SAFETY DUTIES?**
Authority: 30 CFR 250.1506(b) **Enforcement Action:** W
INSPECTION PROCEDURE:
 Verify that procedures are established to verify adequate retention of the knowledge and skills that employees need to perform their assigned well-control or production safety duties.
IF NONCOMPLIANCE EXISTS:
 Issue one warning (W) INC for an audit of a lessee's training program if procedures are not established to verify adequate retention of the knowledge and skills that employees need to perform their assigned well-control or production safety duties.
- G-851** **DOES CONTRACTOR'S TRAINING PROGRAM PROVIDE FOR PERIODIC TRAINING AND VERIFICATION OF WELL-CONTROL OR PRODUCTION SAFETY KNOWLEDGE AND SKILLS?**
Authority: 30 CFR 250.1506(c) **Enforcement Action:** W
INSPECTION PROCEDURE:
 Verify that the contractor's training program provides for periodic training and verification of well-control or production safety knowledge and skills.
IF NONCOMPLIANCE EXISTS:
 Issue one warning (W) INC for an audit of a contractor's training plan if contractor's training program does not provide for periodic training and verification of well-control or production safety knowledge and skills.
- G-852** **DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR VERIFYING THAT ALL EMPLOYEES AND CONTRACTOR PERSONNEL ENGAGED IN WELL-CONTROL AND PRODUCTION SAFETY OPERATIONS CAN PERFORM THEIR ASSIGNED DUTIES?**
Authority: 30 CFR 250.1503(b)(3) **Enforcement Action:** W
INSPECTION PROCEDURE:
 Verify that the lessee's training plan includes procedures to verify that employees and contractor personnel can perform their assigned well-control and production safety duties.
IF NONCOMPLIANCE EXISTS:
 Issue one warning (W) INC for an audit of a lessee's training program if the training plan does not include procedures to verify that employees and contractor personnel, required to perform well-control and production safety operations, can perform their assigned duties.
- G-853** **ARE ALTERNATIVE WELL-CONTROL AND PRODUCTION SAFETY TRAINING METHODS CONDUCTED IN ACCORDANCE WITH, AND MEET, THE OBJECTIVES OF THE TRAINING PLAN?**
Authority: 30 CFR 250.1503(a) **Enforcement Action:** W
 30 CFR 250.1504
Note: Alternative methods may include computer-based learning, films, or their equivalent. This type of training should be reinforced by appropriate demonstrations and hands-on training.
INSPECTION PROCEDURE:
 Verify that alternative methods conducted are in accordance with, and meet, the objectives of the training plan.
IF NONCOMPLIANCE EXISTS:
 Issue one warning (W) INC for an audit of a lessee's training program if alternative training methods conducted are not in accordance with, and meet, the objectives of the training plan.

- G-854** **IS WELL-CONTROL AND PRODUCTION SAFETY TRAINING FOR EMPLOYEES PROVIDED FROM SOURCES THAT MEET THE REQUIREMENTS OF THE TRAINING PLAN?**
Authority: 30 CFR 250.1503(a) Enforcement Action: W
30 CFR 250.1505
INSPECTION PROCEDURE:
Verify that training for employees is from sources that meet the requirements of the training plan.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a lessee's training program if training for employees is not provided from sources that meet the requirements of the training plan.
- G-855** **IS PERIODIC TRAINING PROVIDED TO ENSURE THAT EMPLOYEES MAINTAIN UNDERSTANDING OF, AND COMPETENCY IN, WELL-CONTROL OR PRODUCTION SAFETY PRACTICES?**
Authority: 30 CFR 250.1506(a) Enforcement Action: W/C
INSPECTION PROCEDURE:
1. Verify that the training plan provides for periodic training to ensure that employees maintain understanding of, and competency in, well-control or production safety practices.
2. Verify that periodic training is provided to ensure that employees maintain understanding of, and competency in, well-control or production safety practices.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a lessee's training program if the training plan does not provide for periodic training to ensure that employees maintain understanding of, and competency in, well-control or production safety practices.
Issue one component shut -in (C) INC for each employee that is not provided periodic training to ensure that the employee maintains understanding of, and competency in, well-control or production safety practices.
Note: The employee is the component.
- G-856** **DOES EACH EMPLOYEE UNDERSTAND AND PERFORM THE ASSIGNED WELL-CONTROL OR PRODUCTION SAFETY DUTIES?**
Authority: 30 CFR 250.1503(a) Enforcement Action: W/C
INSPECTION PROCEDURE:
Verify that lessee's training plan provides a process to ensure that employees understand and can perform their assigned well-control or production safety duties.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of one or more employees if the training plan fails to provide a process to ensure that employees understand and can perform assigned well-control or production safety duties.
Issue one component shut -in (C) INC for one or more employees that do not understand or cannot perform the assigned well-control or production safety duties.
Note: The employee is the component.
- G-857** **DOES THE LESSEE ALLOW MMS OR ITS AUTHORIZED REPRESENTATIVE TO ADMINISTER WRITTEN OR ORAL WELL-CONTROL OR PRODUCTION SAFETY TESTS AT THE WORK SITE OR ONSHORE LOCATION?**
Authority: 30 CFR 250.1507(c) Enforcement Action: W
30 CFR 250.1508(a)
INSPECTION PROCEDURE:
Verify that MMS or its authorized representative is allowed to administer written or oral tests at the lessee's work site or onshore location.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a lessee's training program if MMS or its authorized representative is not allowed to administer written or oral tests at the lessee's work site or onshore location.

- G-858** **DOES THE LESSEE ALLOW MMS OR ITS AUTHORIZED REPRESENTATIVE TO ADMINISTER OR WITNESS HANDS -ON, SIMULATOR, OR OTHER TYPES OF WELL-CONTROL AND PRODUCTION SAFETY TESTING?**
Authority: 30 CFR 250.1507(d) **Enforcement Action:** W
30 CFR 250.1509(a)
INSPECTION PROCEDURE:
Verify that MMS or its authorized representative is allowed to administer or witness testing.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a lessee’s training program if MMS or its authorized representative is not allowed to administer or witness testing.
- G-859** **DOES THE LESSEE PAY FOR ALL COSTS ASSOCIATED WITH WELL-CONTROL OR PRODUCTION SAFETY TESTING, EXCLUDING SALARY AND TRAVEL COSTS FOR MMS PERSONNEL?**
Authority: 30 CFR 250.1507(d) **Enforcement Action:** W
30 CFR 250.1509(c)
INSPECTION PROCEDURE:
Verify that the lessee pays for all costs associated with testing, excluding salary and travel costs for MMS personnel.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a lessee’s training program if the lessee fails to pay for all costs associated with testing, excluding salary and travel costs for MMS personnel.
- G-860** **DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR RECORD KEEPING AND DOCUMENTATION OF WELL-CONTROL AND PRODUCTION SAFETY TRAINING?**
Authority: 30 CFR 250.1503(b)(5) **Enforcement Action:** W
INSPECTION PROCEDURE:
Verify that lessee’s training plan includes procedures for record keeping and documentation.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a lessee’s training program if the training plan being reviewed fails to include procedures for record keeping and documentation.
- G-861** **DOES THE LESSEE IDENTIFY PERSONNEL BY CURRENT POSITION, YEARS OF EXPERIENCE IN PRESENT POSITION, YEARS OF TOTAL OIL FIELD EXPERIENCE, AND EMPLOYER NAME, AT THE WORK SITE OR ONSHORE LOCATION?**
Authority: 30 CFR 250.1508(b) **Enforcement Action:** W
30 CFR 250.1509(b)
INSPECTION PROCEDURE:
Verify that lessee records identify well-control and production safety personnel by current position, years of experience in present position, years of total oil field experience, and employer name (e.g., operator, contractor, or subcontractor name).
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a lessee’s training program if lessee records fail to identify well-control and production safety personnel by current position, years of experience in present position, years of total oil field experience, and employer name.
- G-862** **DOES THE LESSEE PROVIDE COPIES OF TRAINING DOCUMENTATION FOR PERSONNEL INVOLVED IN WELL-CONTROL OR PRODUCTION SAFETY OPERATIONS FOR THE PAST FIVE YEARS WHEN REQUESTED BY THE MMS REGIONAL OR DISTRICT SUPERVISOR?**
Authority: 30 CFR 250.1503(c)(1) **Enforcement Action:** W
INSPECTION PROCEDURE:
Verify that training documentation was provided when requested by the MMS Regional or District Supervisor.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a lessee’s training program for each request if the lessee failed to provide the training documentation when requested by the MMS Regional or District Supervisor.

Appendix G
Letter of Non-Compliance

XYZ Oil Company
Attention: MR. XYZ
XYZ Boulevard
Houston, TX 12345

Current Date

Mr. XYZ:

On (date) , the Minerals Management Service conducted an audit of your Subpart O Training Program. This audit was conducted at (location) and included the following individuals:

Company Representatives

Cecile R. Smith
Harry Jones
Bob Smith

MMS Representatives

Mr. Headquarters
Mr. GOMR
Mr. POCS
Mr. AKOCS

During this audit, MMS personnel (list audit tools used). As a result of the audit, the following deficiencies were identified:

- 1.
- 2.
- 3.

Based on these deficiencies, the following Incidents of Non-Compliance were issued (see attached):

1. G-405
2. G-406
3. G-407

You are required to submit to this office an amended training plan, which includes corrective measures to address the aforementioned deficiencies. This amended plan is to be submitted to this office within 14 days of receipt of this letter.

Sincerely,

RSOFO's Signature
or
Chief EOD Signature

APPENDIX H
SUBPART O COMPLIANCE QUESTIONNAIRE

Date: _____

Organization Name: _____ **Facility Name:** _____

Auditors:

Additional Information about Auditee and Audit Site:

NO.	QUESTIONS	REG PINC	Yes, No, N/A	COMMENTS
1.	<p>Has a well-control/production safety training program been established and implemented?</p> <p>Expectations</p> <ul style="list-style-type: none"> • Company policy regarding training of affected employees. • Written training plan having a process for the administration of training needs. 	1503(a) G-841		
2.	<p>Does the training plan specify the type of training?</p> <p>Expectations</p> <ul style="list-style-type: none"> • Plan should state what type of training will be conducted. 	1503(b) G-844		
3.	<p>Does the training plan specify the method(s) of training?</p> <p>Expectations</p> <ul style="list-style-type: none"> • Plan should identify what methods will be used, i.e., classroom, CBT, OJT, etc. 	1503(b) G-844		
4.	<p>Does the training plan specify the length of training?</p> <p>Expectations</p> <ul style="list-style-type: none"> • Plan should state how long the training will last, i.e., 4 hrs, 8 hrs, 3 days, 5 days, etc. 	1503(b) G-844		

NO.	QUESTIONS	REG PINC	Yes, No, N/A	COMMENTS
5.	<p>Does the training plan specify the frequency of training?</p> <p>Expectations</p> <ul style="list-style-type: none"> Plan should state how often the training is provided? 	1503(b) G-844		
6.	<p>Does the operator provide periodic training to ensure understanding and competency?</p> <p>Expectations</p> <ul style="list-style-type: none"> Training records should reflect that the frequency in the plan is followed 	1506(a) G-855		
7.	<p>Does the training plan include procedures for assessing the employee needs on a periodic basis?</p> <p>Expectations</p> <ul style="list-style-type: none"> Plan should reflect how often personnel are assessed/tested. This should be consistent with the same frequency of training. 	1503(b)(4) G-845		
8.	<p>Does the training plan specify the content of training?</p> <p>Expectations</p> <ul style="list-style-type: none"> Lesson plans showing course content Course outline with time schedule 	1503(b) G-844		

NO.	QUESTIONS	REG PINC	Yes, No, N/A	COMMENTS
9.	<p>Does the training plan specify the method of verifying employee understanding and performance?</p> <p>Expectations</p> <ul style="list-style-type: none"> • Written description of how employees' understanding would be verified. 	1503(b) G-849		
10.	<p>Does the operator verify that employees understand and can they perform their assigned duties?</p> <p>Expectations</p> <ul style="list-style-type: none"> • Records documenting testing (oral or hands-on) to verify that employees understand duties. 	1503(a) G-850		
11.	<p>Are procedures established to verify adequate retention of knowledge and skills?</p> <p>Expectations</p> <ul style="list-style-type: none"> • Written description of how employees' understanding would be verified. • Plan should reflect how often personnel are assessed/tested. This should be consistent with the same frequency of training. 	1506(b) G-850		
12.	<p>Does the training plan include procedures for training employees in well-control/production safety?</p> <p>Expectations</p> <ul style="list-style-type: none"> • Plan should state in order how the employee will advance through the training process. 	1503(b)(1) G-843		

NO.	QUESTIONS	REG PINC	Yes, No, N/A	COMMENTS
13.	<p>Does the training plan include procedures for record keeping and documentation?</p> <p>Expectations</p> <ul style="list-style-type: none"> • Training records kept in accordance with established procedures. • Training records for 5 years. 	1503(b)(5) G-860		
14.	<p>Does the training plan include procedures for internal audits?</p> <p>Expectations</p> <ul style="list-style-type: none"> • Written document describing the audit process of the training program • Records of completed audits. 	1503(b)(6) G-847		
15.	<p>Does the lessee provide 5 years of records?</p> <p>Expectations</p> <ul style="list-style-type: none"> • Training records for 5 years are available upon request. 	1503(c)(1) G-862		
16.	<p>If alternative training methods are used, are they supplemented with appropriate demonstrations and hands-on training?</p> <p>Expectations</p> <ul style="list-style-type: none"> • Description of alternative methods used. • Description of the supplemental hands-on training. • Training records indicating that both have been satisfactorily completed. 	1504 G-853		

NO.	QUESTIONS	REG PINC	Yes, No, N/A	COMMENTS
17.	<p>Does the training plan include procedures for evaluating the well control/production safety training programs of the contractors?</p> <p>Expectations</p> <ul style="list-style-type: none"> • Written description of the evaluation process. • Documentation assessing the contractors' training plan(s). 	1503(b)(2) G-846		
18.	<p>Does the training plan include procedures for verifying that contractor personnel can perform their assigned duties?</p> <p>Expectations</p> <ul style="list-style-type: none"> • Written description of how the operator verifies that contractors have been trained. • Necessary documentation showing that procedures are being followed. 	1503(b)(3) G-852		
19.	<p>Does the operator ensure that the contractors' training programs provide for periodic training?</p> <p>Expectations</p> <ul style="list-style-type: none"> • Documentation indicating that operator has verified that contractor provides periodic training 	1506(c) G-851		
20.	<p>Does the operator ensure that the contractors' training program verifies knowledge and skill?</p> <p>Expectations</p> <ul style="list-style-type: none"> • Documentation indicating that operator has verified that contractors are testing knowledge and skill 	1506(c) G-851		

NO.	QUESTIONS	REG PINC	Yes, No, N/A	COMMENTS
21.	Does the lessee provide a copy of its training plan when requested?	1503(c)(2) G-848		
22.	Is well-control/production safety training provided from sources that meet the requirements of the training plan?	1505 G-854		
23.	Is the lessee prepared to explain its overall well-control/production safety training program? Expectations <ul style="list-style-type: none"> • Lessee should be able to provide a general overview with some detail of how they are training their personnel 	1507(a) G-842		
24.	Does the lessee produce evidence to support its explanation of its training program? Expectations <ul style="list-style-type: none"> • The lessee should be able to produce course outlines, records, audit reports, etc. supporting the plan 	1507(a) G-842		
25.	Does the lessee allow MMS or its authorized representative to administer written or oral tests?	1508(a) G-857		

NO.	QUESTIONS	REG PINC	Yes, No, N/A	COMMENTS
26.	Does the lessee identify personnel by current position, years of experience in present position, years of total oilfield experience, and employer name at the work site or onshore location during an audit?	1508(b) 1509(b) G-861		
27.	Does the lessee allow MMS or its authorized representative to administer or witness hands-on or simulator tests?	1509(a) G-858		
28.	Does the lessee pay for all training costs?	1509(c) G-859		