

U.S. Office of Personnel Management
Office of Merit Systems Oversight and Effectiveness
Classification Appeals and ELSA Programs



Dallas Oversight Division
1100 Commerce Street, Room 4C22
Dallas, TX 75242

Classification Appeal Decision
Under Section 5112 of Title 5, United States Code

Appellant: [The appellant]

Agency classification: Petroleum Engineering Technician
GS-802-10

Organization: Oil and Gas Inspection Team
Farmington District Office
New Mexico State Office
Bureau of Land Management
Department of the Interior
Farmington, New Mexico

OPM decision: GS-1802-7
title at agency discretion

OPM decision number: C-1802-07-02

/s/

Bonnie J. Brandon
Classification Appeals Officer

5/29/98

Date

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the government. The agency is responsible for reviewing its classification decisions for identical, similar, or related positions to ensure consistency with this decision. There is no right of further appeal. This decision is subject to discretionary review only under conditions and time limits specified in the Introduction to the Position Classification Standards, appendix 4, section G (address provided in appendix 4, section H).

Decision sent to:

[The appellant's
name and address]

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Director of Personnel
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Introduction

On April 7, 1997, the Dallas Oversight Division of the U.S. Office of Personnel Management (OPM) received a classification appeal from [the appellant]. His position is currently classified as Petroleum Engineering Technician, GS-802-10. However, he believes its classification should be to the GS-1801 series at the GS-11 or GS-12 grade level. He works in the Oil and Gas Inspection Team, Farmington District Office, New Mexico State Office, Bureau of Land Management (BLM), Department of the Interior, Farmington, New Mexico. We have accepted and decided his appeal under section 5112 of title 5, United States Code.

To help decide the appeal, Oversight Division representatives conducted both a phone and site audit of the appellant's position. The audits included interviews with the appellant, his team leader, and his immediate supervisor. In reaching our classification decision, we have reviewed the audit findings and all information of record furnished by the appellant and his agency, including his official position description 03861.

General issues

In May 1996, the appellant's position was affected by a BLM classification consistency review of Oil and Gas Inspection and Production Accountability positions within the Bureau. The position was reclassified from Production Accountability Specialist, GS-1801-11, to Petroleum Engineering Technician, GS-802-10. The appellant appealed this classification to the Department of the Interior, which sustained the series and grade of the position.

The appellant contends that his position description is inaccurate. However, except for the fact that the appellant does not spend 25 percent of his time performing the duties described in the addendum to his position description, we determined that the position description is adequate for classification purposes.

Position information

The Federal Oil and Gas Royalty Management Act of 1982 places emphasis on proper accountability of production from Federal and Indian oil and gas lease sites. The primary responsibility of the appellant's position is to review production records to verify the accuracy of oil and gas volumes reported by lease operators. These volumes determine the royalty payments that are due the public and Tribes from Federal and Indian leased land. The appellant performs under the general supervision of the Assistant District Manager for Minerals.

The appellant and his supervisor both estimate that approximately 60 percent of his time is devoted to conducting production accountability reviews. This involves deciding which leases or wells will be the subject of a review based on an identification of those with high production volumes, periods of no production, a history of misreporting, or upon request from other sources such as the Bureau of Indian Affairs or Minerals Management Service who have noted possible reporting problems. In conducting a review, the appellant requests that the operator submit copies of actual production records covering a specific period of time, often for lengthy periods of several months. Records

requested include gas meter charts, chart integration volume and purchasers' gas volume statements, meter calibration reports, gas chromatograph analyses, methods used to estimate volumes of gas flared/vented or to estimate gas used on lease and related information, oil run tickets, pipeline run statements, tank numbers and strapping tables, daily pumpers reports, seal records, etc. From these records, the appellant calculates the actual number of barrels of oil and gas Mcf's produced each month during the review period and compares the calculations with the production data reported by the operator on the Monthly Report of Operations (MRO's), reports submitted by operators to the Minerals Management Service reflecting monthly oil and gas production and sales figures on a lease or well. The appellant notifies the operator of the discrepancies, considers any response, and decides whether to require the operator to amend the reports. The appellant additionally is responsible for the performance of related duties involving recommending approval of applications for off-lease measurement or commingling systems.

The remaining 40 percent of the appellant's time is spent performing on-site inspections of oil and gas production operations and facilities in conjunction with a production accountability review. The inspections involve witnessing gas meter calibrations and Lease Automatic Custody Transfer (LACT) meter provings, and oil sales by tank gauge to ensure proper measurement. The appellant independently gauges oil and water tanks to verify volumes reported, verifies the accuracy of site security diagrams, and ensures valves are properly sealed.

The appellant's position description reflects that at least 25 percent of his time is spent performing on-site inspections of oil and gas drilling and workover and/or plugging and abandonment operations. However, the appellant has spent only a very minimal part of his time (approximately 5 percent) during the past year performing these types of inspections.

Series and title determination

The appellant believes that his position should be classified in the GS-1801 General Inspection, Investigation, and Compliance Series. This series includes positions that primarily administer, coordinate, supervise, or perform inspectional, investigative, analytical, or advisory work to assure understanding of and compliance with Federal laws, regulations, or other mandatory guidelines when such work is not more appropriately classifiable in another series. This is a two-grade interval series.

The GS-1801 standard explains the distinctions between one- and two-grade interval inspection work. A position is properly considered two-grade interval when there is a requirement for analysis and exercise of judgment beyond matching situations found to well-established precedents or clear-cut guidelines. Inspections where the work is of the two-grade interval variety generally combine several phases including, but not necessarily limited to, observation, interview, and examination of records. Judgments made by inspectors engaged in work typical of the two-grade interval pattern are ordinarily based on the interpretation and application of pertinent law and regulations to situations found during the course of an inspection. Situations found in inspections of the two-grade interval pattern are not susceptible to instant determinations of compliance or noncompliance. They require subsequent evaluation of inspection data, and findings are generally recorded in a written narrative.

The appellant's position is not of a two-grade interval nature. In conducting a production accountability review, the appellant is required to carefully examine records to determine if the actual production of oil and gas volumes matches the figures shown on MRO's. The appellant must consider a number of factors that may have affected the amounts of production reported, such as whether an amount of gas used on the lease was reasonable, if amounts of gas reported as flared and vented were within tolerance ranges, or whether the wells are operating under an approved off-lease measurement system. However, the appellant's decision as to whether the operator is complying with the requirement to report accurately ultimately involves a comparison of the production figures the appellant has computed and/or identified from the records with that reported by the operator. These decisions are more clear-cut and readily apparent than those encountered in two-grade interval inspections. Regulations and guidelines used by the appellant in conducting reviews are well established and do not require significant interpretation or adaptation to accomplish the work.

The GS-1802 Compliance Inspection and Support Series includes positions which perform or supervise inspectional or technical support work in assuring compliance with or enforcement of Federal law, regulations, or other mandatory guidelines and which are not classifiable in another, more specific occupational series. The work requires a knowledge of prescribed procedures, established techniques, directly applicable guidelines, and pertinent characteristics of regulated items or activities. The primary purpose of the appellant's position is to conduct the records review portion of inspections of oil and gas operations to ensure operators comply with Federal laws and regulations requiring the accurate reporting of oil and gas volumes produced. As indicated earlier, this work is of a one-grade interval nature in that determinations of compliance or noncompliance are made based on a comparison of the appellant's review of actual production records with volumes reported. The work requires a working knowledge of oil and gas operations, specifically as related to the production of petroleum products and the records and measurements used to determine volumes produced. We determined that the records review portion of the oil and gas inspections is most appropriately classified in the GS-1802 series.

The appellant's performance of on-site inspectional work of oil and gas leases is appropriately classified in the GS-802 Engineering Technician Series. This series includes technical positions that primarily require application of a practical knowledge of (1) the methods and techniques of engineering, and (2) the construction, application, properties, operation, and limitations of engineering systems, processes, structures, machinery, devices, and materials. This series includes positions performing nonprofessional technical work in functions such as research, development, design, evaluation, construction, inspection, production, application, standardization, test, or operation of engineering facilities, structures, systems, processes, equipment, devices, or materials. The functions involve the solution of technical problems that primarily require application of a practical knowledge of the methods and techniques by which materials, natural resources, and power are made useful.

For positions whose duties fall in more than one occupational group, the Introduction to the Position Classification Standards states that the most appropriate series for the position depends on consideration of a number of factors, but for most positions, the grade controlling duties will

determine the series. Since the appellant's duties relating to the records review portion of gas and oil inspections represent the highest grade level of work performed and the primary purpose of the position, we have determined that the GS-1802 Compliance Inspection and Support Series is appropriate for the appellant's position.

Since no titles are specified for positions in the GS-1802 series, the agency may establish a title consistent with the Office of Personnel Management's guidelines on titling practices in the Introduction to the Position Classification Standards.

Standard determination

The standard for the GS-1802 Compliance Inspection and Support Series does not contain grade level criteria. Evaluation for nonsupervisory positions in this series is determined by reference to classification standards involving analogous knowledges and skills. We used two standards to determine the grade level of the records review portion of the oil and gas inspections: the Grade Level Guide for Clerical and Assistance Work and the GS-344, Management and Program Clerical and Assistance Series, standard.

The appellant's duties relating to the conduct of on-site field inspections are properly graded by application of the GS-802, Engineering Technician Series, standard.

Grade determination

Evaluation using the Grade Level Guide for Clerical and Assistance Work

The Grade Level Guide for Clerical and Assistance Work provides general criteria for use in determining the grade level of nonsupervisory clerical and assistance work. Assistance work is defined as technical work performed to support the administration or operation of the programs of an organizational unit. This work requires a working knowledge of the work processes and procedures of an administrative field and the mission and operational requirements of the unit. The appellant's review of production records is consistent with that defined as assistance work in that the work is performed in support of the Inspection and Enforcement Program and a working knowledge of the work processes and procedures involved in reporting production volumes is needed to determine the accuracy of reports. The work requires a knowledge of applicable laws, policies, and regulations relating to the reporting of oil and gas volumes.

The guide provides a general description of the characteristics of each grade level from GS-1 through GS-7 in a three-part format:

- (1) the definition of the grade level as spelled out in the law (5 U.S.C. 5104);
- (2) a description of grade level criteria pertaining to clerical and assistance work written in narrative format as expressed in two evaluation factors: *Nature of assignment* (which

includes the elements of knowledge required and complexity of the work), and *Level of responsibility* (which includes the elements of supervisory controls, guidelines, and contacts); and,

- (3) general work examples to illustrate each grade level.

The appropriate grade level is determined by applying the total criteria (i.e., the law, the evaluation factors, and the work examples) and assigning the highest level that matches the work being evaluated. Weaknesses as well as strengths are considered in matching work to the grade level criteria. The following is our evaluation of the appellant's position in terms of this guide.

Nature of assignment

At the GS-6 level, the work requires considerable evaluative judgment within well-defined, commonly occurring aspects of an administrative program or function. The work involves continuing processes based on direct application of established policies, practices, and criteria. Assignments consist of a relatively narrow range of case situations that remain stable and resemble past problems or situations. The work requires practical knowledge of guidelines and skill to recognize the dimensions of a problem and express ideas in writing.

At the GS-7 level, the work consists of specialized duties with continuing responsibility for projects, questions, or problems that arise within an area of a program. Work assignments involve a wide variety of problems or situations common to the segment of the program of responsibility. Decisions or recommendations are based on the development and evaluation of information that comes from various sources. The work involves identifying and studying factors or conditions and determining their interrelationships as appropriate to the defined area of work. The work requires knowledge and skill to recognize the dimensions of the problems involved, collect the necessary information, establish the facts, and take or recommend action based upon application or interpretation of established guidelines.

The nature of the appellant's assignments exceeds the GS-6 level in that the work involves a broader range of situations and problems than described at this level. As at the GS-7 level, the appellant's work is specialized and involves continuing responsibility for planning and conducting in-depth reviews of production records which substantiate or dispute the oil and gas volumes reported by lease or well operators. In conducting the reviews, the appellant may encounter a variety of differing situations relating to the lease agreements which must be taken into consideration in determining the cause of reporting errors, such as the effects communitization agreements or off-lease sales and measurement systems have on production volumes, reviewing site diagrams to identify machinery in operation which may be using gas on the lease and determining whether the amounts are reasonable, etc. The appellant identifies discrepancies in the production reports and determines the type and amount of records which must be reviewed in order to determine the extent of the inaccuracies and advise the operator of the corrections needed to achieve compliance. A variety of records in varying formats relating to the production of oil and gas are reviewed to determine appropriate volumes, such

as pumpers' gauge records, oil run tickets, valve seal records, gas meter and integration charts, spill reports, hauling tickets, etc. The appellant notifies the operator, either orally or in writing, of the discrepancies, considers any response, and independently decides whether to require the operator to amend production reports. In recommending approval of an operator's application for an off-lease measurement system, the appellant determines that the allocation formula proposed for computing volumes for each well involved is appropriate and that all wells in the gathering system are included in the allocation.

Level of responsibility

At the GS-6 level, the supervisor assists with precedent assignments by providing an interpretation of policy. Completed work is evaluated for appropriateness and effectiveness in meeting goals. Guidelines are available but often are not completely applicable to the assignment or have gaps in specificity. The employee uses judgment in interpreting and adapting guidelines, and bases decisions and recommendations on facts and conventional interpretations of guidelines rather than on theory or opinion. Personal contacts are with employees in the agency or in other agencies, with management, or with those using the services. The contacts are for the purpose of providing, receiving, or developing information in order to identify problems, needs, or issues or coordinate work efforts and resolve problems.

At the GS-7 level, the supervisor makes assignments in terms of objectives, priorities, and deadlines. The employee independently completes assignments in accordance with accepted practices, resolving most conflicts that arise. Completed work is evaluated for appropriateness and conformance to policy. Guidelines for the work are more complex than at the GS-6 level because the employee encounters a variety of problems and situations which require choosing alternative responses. Guides tend to be general and descriptive of intent, but they do not cover all aspects of the assignments. Employees must use significant judgment and interpretation to apply the guides to specific cases. The contacts and purpose of contacts are generally the same as at the GS-6 level. However, to a greater degree, the employee serves as a central point of contact to provide authoritative explanations of requirements, regulations, and procedures and resolve operational problems or disagreements affecting assigned areas.

The appellant's level of responsibility exceeds the GS-6 level in that he operates with more independence and receives less assistance from the supervisor than described at that level. Based on overall program objectives, the appellant selects cases for review based on his identification of irregularities and anomalies in the production history such as extreme variations in reported production volumes when the number of days of production remains constant, or no oil is reported on a producing oil well but gas and/or water are reported, etc. The appellant independently determines if production volumes were reported accurately. Using spreadsheets which make adjustments for gravity, temperature, and percent of basic sediment and water, the appellant calculates the actual volumes of oil produced and sold from information included on oil run tickets and compares his computations with the reported volumes. Similarly, he ensures the accuracy of gas volumes reported by using spreadsheets which make adjustments for fuel used on lease and apply any

allocation factors involved if an off-lease measurement system has been approved. He reviews meter calibration reports to determine if the meter is calibrated within a two percent error tolerance range. Completed work is reviewed in terms of the soundness of conclusions and consistency with established objectives. Guidelines used by the appellant include the Federal Oil and Gas Royalty Management Act; Code of Federal Regulations, including BLM Onshore Orders; and internal instruction memoranda and guidance material. The appellant has been delegated authority to issue Incidents of Noncompliance (INC's) when operators fail to submit paperwork or fail to establish or maintain facility records such as site security plans, seal records, and/or a self-inspection program. Failure by the operator to correct a cited problem may result in the assessment of fines. The appellant serves as a central point of contact concerning the conduct of the production reviews. Contacts are established with representatives from other Federal agencies, Indian Tribe officials, and operators or their representatives, such as accountants and attorneys, to resolve discrepancies and obtain compliance with reporting requirements. The appellant's level of responsibility is consistent with that depicted at the GS-7 level.

Grade summary

Based on application of this guide, GS-7 is determined to be the proper grade of the position since both factors, *Nature of assignments* and *Level of responsibility*, meet that level.

Evaluation using the GS-344, Management and Program Clerical and Assistance Series, standard

The GS-344 series includes positions involved in supervising or performing clerical and technical work in support of management analysis and program analysis, the purposes of which are to evaluate and improve the efficiency, effectiveness, and productivity of organizations and programs. The grading criteria in the GS-344 standard may be used to determine the grade of a position in another series when the nature of the work is equivalent to the intent of the factor level descriptions and work illustrations in this standard. Although the appellant's work is not appropriately classified in this series, the kind of work processes and functions involved in the appellant's duties, as well as the level of difficulty and responsibility of her work, are sufficiently comparable to those outlined in the GS-344 standard to support application of the criteria. This standard is published in the Factor Evaluation System (FES) format. Under the FES, positions are evaluated by comparing the duties, responsibilities, and qualifications required with nine factors common to nonsupervisory General Schedule positions. A point value is assigned to each factor in accordance with the factor-level descriptions. For each factor, the full intent of the level must be met to credit the points for that level. The total points assigned for the nine factors are converted to a grade by reference to the grade conversion table in the standard. A factor-by-factor analysis of the appealed work is provided.

Factor 1, Knowledge required by the position

This factor measures the nature and extent of information or facts a worker must understand in order to do acceptable work and the nature and extent of skills needed to apply these knowledges.

Work at Level 1-3 requires a practical knowledge of a body of established clerical or technical procedures and requirements related to the assigned management and/or program analysis duty or task. It also requires a general knowledge of one or a few similar, established, and relatively stable management or program operations. In addition, some of the work requires one or more of the following: skill in compiling readily available data from prescribed sources and recognizing and correcting obvious discrepancies and data omissions; knowledge of the basic principles of arithmetic to use established formulas to make routine calculations such as standard production rates, staff hours, or funding use; or familiarity with one or more established automated systems to enter, correct, and retrieve factual information, compile reports, produce charts and graphs, or monitor project or program status. Employees use this knowledge to perform a full range of standard duties, tasks, or assignments and to resolve recurring problems.

Level 1-4 requires knowledge of an extensive body of management and/or program analysis technical rules, guidelines, regulations, and precedents. It also requires knowledge of the basic objectives and policies governing various management or program operations. Some work also requires skill in basic data gathering methods, such as standard interviewing, to collect various types of factual information. Some employees also apply knowledge of the standardized processes and procedures for evaluating management or program operations to perform duties such as planning the steps to take to complete assignments, identifying problems from collected data, and selecting solutions from alternatives in guidelines and precedent cases. Some employees also use writing skills to prepare clear, concise reports that describe the data collection techniques and other processes and procedures used, conditions of management or program operations, and recommended improvements. Employees apply this knowledge to individual, nonstandard technical assignments whether the nature of these assignments stems from a changing mix of work or represents diversity within a defined management or program operation. Assignments may involve limited aspects of higher level work.

The knowledge required and nature of skills needed by the appellant to perform his work fully meet but do not exceed Level 1-4. The appellant must apply a working knowledge of oil and gas operations relating to the production measurement of petroleum products and the records used to determine volumes produced, and must have knowledge of the objectives and policies of the Inspection and Enforcement Program in order to determine compliance with reporting requirements by lease operators. The appellant plans the scope of the production accountability reviews and identifies anomalies and discrepancies in the production data reported. To gather and clarify information concerning the data, the appellant must correspond, both orally and in writing, with operators.

Level 1-4 is credited for this factor and 550 points are assigned.

Factor 2, Supervisory controls

This factor considers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work.

At Level 2-2, the supervisor provides general instructions on what is to be done, procedures and methods to follow, data and information required, quality and quantity of work expected, and deadlines. The employee independently carries out recurring tasks or assignments without specific instructions. The supervisor assures that finished work and methods used are technically accurate and in compliance with established instructions, methods, procedures, and deadlines.

At Level 2-3, the supervisor defines the objectives, priorities, and deadlines for projects or assignments and assists the employee with unusual situations, problems, or studies that do not have clear precedents. The employee plans and carries out the successive steps of technical projects and assignments and handles problems in accordance with policies or accepted practices. The supervisor evaluates completed work for technical soundness, appropriateness of conclusions or recommendations, consistency, relevance of support material, and compliance with policies and requirements. The methods used in arriving at the end results are not reviewed in detail.

Supervisory controls over the appealed position fully meet but do not exceed those described in Level 2-3. The supervisor makes the assignments as established in the overall goals. The appellant independently plans and develops the production accountability reviews and resolves problems identified with operators. The appellant is accountable for effective and accurate completion of production accountability reviews. The supervisor does not review the specific methods used by the appellant to determine compliance with reporting requirements, but evaluates completed work in terms of the soundness of conclusions and consistency with established objectives.

Level 2-3 and 275 points are assigned.

Factor 3, Guidelines

This factor covers the nature of the guidelines used and the judgment needed to apply them.

At Level 3-2, a number of established instructions and procedures for doing the work are readily available and clearly applicable to most assignments. The number and similarity of guidelines and work situations require the employee to use judgment in locating, selecting, and applying the most appropriate instructions, references, or procedures to technical assignments. The employee refers situations involving significant deviations from established guidelines to the supervisor for guidance or resolution.

At Level 3-3, guidelines lack specificity or are not completely applicable to the work requirements, circumstances, or problems because of the unique or complicating characteristics of the assignments. The employee uses judgment in interpreting and adapting guidelines to apply to specific situations such as determining the cause or extent of deviations from established production rates or resource use, or determining whether an organization's proposed directives, publications, or functional statements are within the scope of its established delegated authority or assigned function.

Guidelines used by the appellant include the Federal Oil and Gas Royalty Management Act; Code of Federal Regulations, including BLM Onshore Orders; and internal instruction memoranda and guidance material. The appellant is required to use judgment in applying the guidelines to the specifics involved in each unique case in order to identify the appropriate types and amounts of actual production records to review and determine the extent to which production reporting is inaccurate. As previously indicated, the appellant must decide whether operators are in compliance with regulatory requirements, such as timely disposition of oil production, obtaining approval of off-lease measurement, storage, and surface commingling, etc.

The guidelines used and the judgment required to apply them in the appellant's position fully meet but do not exceed Level 3-3. 275 points are assigned.

Factor 4, Complexity

This factor covers the nature, number, variety, and intricacy of tasks, steps, processes, or methods in the work performed; the difficulty in identifying what needs to be done; and the difficulty and originality involved in performing the work.

The work at Level 4-2 consists of duties involving related procedures, processes, or methods to perform individual technical assignments or tasks. The employee decides what needs to be done by identifying easily recognizable differences in the basic characteristics and nature of one or a few similar program operations. The operations involve easily identifiable steps and procedures or clear-cut processes, structures, and workflow. The employee identifies the basic instructions and procedures to follow from among a few established procedural alternatives related to the specific function. The employee considers the nature of the duty, basic purposes and other characteristics of the operations involved, or readily available sources of information to complete routine or standard assignments.

At Level 4-3, the work consists of various duties, projects, or assignments involving different and unrelated technical processes and procedures. Assignments involve various actions or steps that are not completely standardized or prescribed in precedent cases, adaptation or modification of established procedures and methods, various types and sources of information, nonrecurring problems, trends, or issues, etc. The employee decides what needs to be done by considering the characteristics, practices, objectives, and interrelationships of various program operations. The employee studies and analyzes issues such as the nature of the assignments, the various sources of information, the nature and requirements of the operations, and the applicability of precedent cases, rules, and objectives. The employee selects, adapts, and applies the most suitable practices, procedures, methods, and precedents to collect and analyze various types of information, formulate conclusions, define needs, and/or make recommendations for resolving problems to higher level employees.

The complexity of the appellant's work fully meets but does not exceed that described at Level 4-3. The appellant's performance of production accountability reviews involves various actions and steps that are not completely standardized. He must identify anomalies and discrepancies in the operators' production reports and select the appropriate types and sources of data needed to determine the accuracy of the reports. Steps taken to calculate the actual production volumes vary. The appellant is required to identify probable causes of discrepancies, such as determining if the proper pressure bases for sale of gas are used in the calculations, whether the amount of gas used on leases or vented/flared is reasonable, and whether volumes are reported from the proper wellheads and are based on allocation formulas approved in connection with an off-lease measurement system. From his analysis of the production records, the appellant decides whether the oil company has properly reported its oil and gas production volumes, and if not, requires the operator to amend the production reports.

Level 4-3 and 150 points are assigned.

Factor 5, Scope and effect

This factor covers the relationship between the nature of the work and the effect of work products or services within and outside the organization.

At Level 5-2, the purpose of the work is to apply specific rules, regulations, or procedures to perform a full range of clerical and technical tasks, duties, and assignments. These assignments typically comprise a complete segment of a broad project, study, or process. The work affects the accuracy, reliability, quality, and timeliness of products, recommendations, studies, projects, and processes.

At Level 5-3, the purpose of the work is to plan and carry out assignments or projects to improve the efficiency and productivity of program operations. Employees use established methods, practices, and criteria to identify, study, and recommend solutions for resolving conventional problems or questions. The work affects the evaluation and improvement of operating program efficiency and effectiveness and the use and management of staff, funding, equipment, and other resources.

The scope and effect of the appellant's position fully meet but do not exceed that depicted at Level 5-3. The appellant plans and carries out detailed production accountability reviews designed to improve compliance and increase accuracy in production reporting which results in the recovery of lost royalty revenues due the public and Tribes from Federal and Indian leased land.

Factor 6, Personal contacts, and Factor 7, Purpose of contacts

These factors include face-to-face contacts and telephone dialogue with persons not in the supervisory chain, and pertain to the reasons the contacts are made.

The standard describes two levels of persons contacted. At Level 1, contacts are with employees within the immediate organization, office, project, or work unit. Contacts typically include other

support personnel, management analysts, program analysts, administrative officers, or managers. Some positions at this level may involve contacts with members of the general public in very structured situations. At Level 2, contacts are with employees in the same agency, but outside the immediate organization. Persons contacted are managers, employees, and other representatives of the programs involved or organizations served. Some positions at this level may involve contacts with members of the general public, as individuals or groups, in moderately structured settings.

The standard also describes two levels for the purpose of contacts. At Level a, the purpose of the contacts is to obtain, clarify, or provide facts or information. At Level b, the purpose of the contacts is to plan, coordinate, or advise on work efforts; discuss significant findings; or resolve operating problems by influencing or motivating individuals or groups who are working toward mutual goals.

The appellant has contacts with representatives from other Federal agencies, Indian Tribe officials, and operators or their representatives, such as accountants and attorneys. These equate to those described in Level 2 under Personal Contacts. The purpose of the appellant's contacts is to exchange information concerning production reporting figures, resolve discrepancies, and obtain compliance with reporting requirements. This is equivalent to Level b under Purpose of Contacts. Reference to the chart outlined in the standard reflects that 75 points are credited for these factors when Level 2b is assigned.

Factor 8, Physical demands

This factor covers the requirements and physical demands placed on the employee by the work assignments. This includes physical characteristics and abilities and the physical exertion involved in the work.

The physical requirements involved in the appellant's records review duties is a match for Level 8-1. The work requires no special physical demands. It may involve some walking, standing, bending, or carrying of light items. 5 points are assigned.

Factor 9, Work environment

This factor considers the risks and discomforts in the employee's physical surroundings and the safety regulations required.

The work environment of the appellant's position compares to Level 9-1. The records review portion of the inspection work is generally performed in an office requiring normal safety precautions against everyday risks or discomforts. 5 points are assigned.

Summary

In accordance with the criteria published in the standard for the GS-344 series, the appellant's position is evaluated as follows:

Factor	Level	Points
1. Knowledge Required by the Position	1-4	550
2. Supervisory Controls	2-3	275
3. Guidelines	3-3	275
4. Complexity	4-3	150
5. Scope and Effect	5-3	150
6. and 7. Personal Contacts and Purpose of Contacts	2-b	75
8. Physical Demands	8-1	5
9. Work Environment	9-1	5
TOTAL POINTS		1485

The assignment of 1485 points falls within the range of GS-7 (1355-1600 points) in the grade conversion table published in the standard.

Evaluation using the GS-802, Engineering Technician Series, standard

The GS-802 standard defines grade levels under two criteria: *Nature of assignment* and *Level of responsibility*. The following is our evaluation of the appellant's on-site field inspection duties.

Nature of assignment

At the GS-5 level, engineering technicians typically carry out operations in variable sequences that are not completely standardized or prescribed. The GS-5 technician uses a variety of standard references, guides, and precedents to obtain needed information and to select and adapt methods and procedures. GS-5 technicians apply a background of knowledge and understanding of engineering practices based on a background of substantial training and experience in the specialty field. GS-5 technicians perform tests for which procedures have been developed but not completely standardized and that require modifications in test procedures and test equipment. They also perform such related tasks as preparing test specimens, adjusting and operating equipment, recording instrumental readings, and evaluating test data. The test equipment and test procedures require some experimental skill and judgment in order to obtain accurate, reproducible data. GS-5 positions differ from GS-4 in that the GS-5 applies specialized knowledge, skill, and judgment to a significant degree in tasks such as adapting and devising simple auxiliary devices such as supports, adaptors, couplings, and holders; adjusting equipment to ensure optimum operation; determining results of tests that are not susceptible to precise, quantitative measure but require subjective determinations; and determining the causes of deviations in the test data, e.g., equipment malfunctions or observational errors.

The appellant performs production inspections which cover all phases of oil and gas production operations and facilities. This involves witnessing the sale of oil to ensure proper measurement, and independently measuring oil tanks, obtaining and accurately recording temperature readings from the tanks, extracting samples of oil and properly testing the samples for basic sediment and water levels, obtaining gravity readings, etc., in order to calculate the amount of oil to verify volumes reported. The appellant witnesses LACT meter provings which involve processes similar to that described above. In addition, the appellant witnesses the calibration of gas meters to ensure the operator properly adjusts the equipment to ensure temperature and differential and static pressure levels record accurately. The appellant witnesses the inspection of the orifice plate to ensure it is not damaged and conforms to American Gas Association standards and specifications. The appellant ensures seals are placed on valves in accordance with applicable Onshore Orders and ensures facility and well signs are posted. The appellant inspects the water disposal pit to determine if the content includes oil, and inspects the grounds to detect any oil spills. The appellant verifies the accuracy of site security diagrams, including analyzing flow line systems. When the appellant finds violations or noncompliance in the course of inspections, he obtains voluntary compliance when possible, or issues INC's which may result in the assessment of fines.

The appellant's inspection duties performed on site at oil and gas leases are equivalent to the GS-5 level. The appellant applies a background of knowledge and understanding of engineering practices based on substantial training and experience in the oil and gas industry. The appellant has been certified by BLM as an Oil and Gas Inspector. The appellant's work associated with witnessing gas meter calibrations is similar to one of the illustrative assignments depicted at the GS-5 level in which the work differs from GS-4 in that greater judgment and experience are required to overcome difficulties encountered, such as fluctuating indicators, instability, and poor response.

The appellant's inspection duties performed on site at oil and gas leases do not meet the GS-6 level. GS-6 engineering technicians carry out nonroutine assignments of substantial variety and complexity. The work is more complex than that of GS-5 in that GS-6 employees apply a background of knowledge based on intensive training and diversified experience in the particular specialty field and, in addition, knowledge of engineering practice in related fields. The appellant's inspection work is not substantially varied, nor does it require a knowledge of engineering practices in fields other than oil and gas.

Level of responsibility

At the GS-5 level, work assignments which involve concepts and nonstandard methods familiar to the technician are made in terms of the objectives to be achieved and without explicit instructions as to work methods. Nonroutine technical problems of the type previously encountered by the technician in the course of the work are typically resolved independently, but may be referred to others in unusual cases. Assistance in solving technical problems involving unfamiliar methods or concepts is provided by the supervisor. The methods applied and technical adequacy of the completed work are reviewed or checked.

At the GS-6 level, technical problems, including some not previously encountered by the technician, involving concepts and methods for which agency guides and precedents are applicable are resolved independently. Completed work is reviewed for technical adequacy but the methods applied by the technician are not normally reviewed as at grade GS-5.

The appellant's level of responsibility is consistent with that described at the GS-6 level. He has authority to cite operators for noncompliance with requirements and independently resolves any problems that may be encountered during an inspection. His work is reviewed in terms of adherence to established policies and overall program objectives.

Summary

We have determined that the nature of the appellant's assignments relating to on-site production inspections is equivalent to the GS-5 grade level, and the level of the appellant's responsibility with respect to on-site production inspections is equivalent to the GS-6 grade level. However, careful reading of the standard and other OPM guidelines indicates that for a position's level of responsibility to truly meet GS-6 criteria, the responsibilities should be exercised within the context of GS-6 assignments. As discussed under the first classification factor, the appellant's assignments are best graded at GS-5. Accordingly, the appellant's on-site production inspections are appropriately classified at the GS-5 grade level.

Decision

The appellant's duties involving the records review portion of the inspections is properly graded at GS-7 based on application of both the Grade Level Guide for Clerical and Assistance Work and the Management and Program Clerical and Assistance Series, GS-344, standard. Since these duties represent the highest grade level of work performed, the position should be graded at GS-7 overall.

We have decided that the appellant's position is properly classified as GS-1802-7. OPM has prescribed no titles for positions in that series. Therefore, according to section III.H.2. of the Introduction to the Position Classification Standards, the appellant's agency may choose the official title for the position. In doing so, the agency should follow the titling guidance in that section.