

Safety Alert

MMS

U.S. Department of the Interior
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Gulf of Mexico OCS Region

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Training

Since the implementation of the Subpart O performance-based training rule, MMS has observed a trend that has raised concerns within the agency. From October 15, 2002, to present, MMS has issued 42 training-related incidents of noncompliance (INCs) to 27 different operators. The majority of these INC's have centered around the operators' evaluations of their contractors, either in their failure to conduct an evaluation of the contractors' training plans or their failure to verify that the contractor personnel were trained.

Studies sponsored by MMS and the American Petroleum Institute have concluded that between 25% and 33% of all remaining undeveloped reservoirs are not drillable by using conventional overbalanced drilling methods, caused in large part by the increased likelihood of well control problems such as differential sticking, lost circulation, kicks, and blowouts. This challenge of efficiently drilling and developing these reservoirs in a manner no less safe than current drilling methods is compounded by an inexperienced workforce.

MMS has observed a large number of experienced and knowledgeable personnel moving from the shelf into the deepwater drilling and production operations. This movement of people, together with the increased level of activity in the Gulf of Mexico, has created voids that are being filled with inexperienced personnel (less than 10 years' total experience), such as toolpushers, drillers, production foremen, and senior production operators, in key positions. This increased level of activity has also forced some companies to use foreign nationals as part of the workforce; resultant language barriers could create additional unsafe conditions in the work environment.

As a result of informal MMS interviews of both operator and contractor personnel, it appears that while personnel on the production facilities appear to be knowledgeable of general production safety systems, those same personnel are sometimes unfamiliar with the specific platform and the associated production safety systems that they are assigned to operate. Personnel indicated that they were assigned to the facilities with little or no site-specific training on the operation of the facility. MMS reminds operators that, as per 30 CFR 250.1500, "production safety" means **production operations** as well as the installation, repair, testing, maintenance, or operation of surface or subsurface safety devices.

Therefore, MMS recommends that operators review and evaluate the adequacy of their training program and policies with specific consideration being given to the following:

- Additional training of those inexperienced personnel to ensure appropriate competency
- Implementation of site specific hands-on training and/or evaluations
- Incorporation of new technology and new issues into training curriculum