

IADC tackles issues far and wide to support interests of US land drilling contractors

IADC CONTINUALLY MONITORS issues and proposed regulations that affect the interests of onshore drilling contractors. This effort is headed by **Joe Hurt**, IADC Director Land Operations. Onshore drillers' activities can be impacted by the activities of the US Department of Transportation, Bureau of Land Management, Environmental Protection Agency and OSHA, among other state and federal agencies.



Joe Hurt

NPDES PERMIT

On 13 January, the EPA posted a notice on their stormwater web page to extend until 12 June 2006 the deadline for NPDES permit for oil and gas construction activity. The regulatory deadline requires stormwater permit coverage for oil and gas construction activities that disturb 1-5 acres of land.

This is significant since implementation of the rule (as it was written in March 2005) could have added many issues for operators to overcome in order to obtain permits to drill wells on locations whose size is 1-5 acres. This would have hindered drilling and could have reduced the number of rigs operating in the US.

DRIVER LOG

A supplemental notice of proposed rule-making issued by the Federal Motor Carrier Safety Administration last November required all motor carriers to use supporting documents to verify the accuracy of information recorded by drivers on their records of duty status (driver logs).

The proposal requires all motor carriers to systematically and effectively monitor their drivers' hours of service and the accuracy of the information contained on the drivers' records of duty status by comparing paper records of duty status, automotive on-board recording device or global positioning system records with information contained in supporting documents.

The motor carrier and driver must identify each supporting document. This may include adding the driver's full name, date and vehicle number if those items do not appear on the document. This must be done without defacing or obscuring other information contained in the supporting document.

A motor carrier would be subject to civil penalties while a driver would be subject to civil penalties for falsifying his record of duty status or altering supporting documents which change their accuracy.

OILFIELD LABOR FORUM

The US Department of Labor held an Energy Industry Workforce Solutions Forum in Houston last December. The forum is an initiative of the DOL's Employment and Training Administration to validate the workforce gaps identified by energy industry associations and organization, including IADC, and their members and partners; identify effective solutions; and recommend strategies to address the industry's hiring, training and retention needs.

The event addressed the workforce challenges facing the industry in a number of key areas, ranging from recruitment of entry-level workers to development of consistent training models and skill certifications.

The forum seeks industry suggestions regarding the types of services that the public workforce system can provide to help address the oilfield workforce challenges.

SAFETY STATISTICS

Mr Hurt presented a white paper on the IADC safety statistics last October at the annual meeting of the International Regulators Forum in Santa Barbara, Calif. Each year, IADC publishes its Annual Report of Occupational Injuries from data submitted by drilling contractors worldwide.

The data is organized into various regions of the world, which has led to questions regarding the variances in the incidence rates from various regions. A task group was organized to analyze the

differences and provide input for the white paper.

The task group came up with three basic conclusions. First, although there are regional differences they are not significant.

Second, some differences are due to actual differences in safety performance, but some are due to the maturity of the reporting culture. Finally, global safety performance is improving.

The bottom line is that when comparing the incidence rates within various regions of the world, the trend lines for lost time and recordable incidence rates are improving.

SAFETY MEETINGS

The IADC HSE Committee has completed its Weekly Safety Meeting Topics and Safety Meeting books. The update incorporates some of the new technology applied to rigs and drilling operations that were not included in the previous version. The revisions also bring topics up to date and in alignment with standards for equipment in the field today including topics about power tongs, top drives, automatic slips, air winches, etc.

HSE COMMITTEE MEETINGS

IADC conducts numerous regional HSE Committee meetings in various regions of the US where our members operate. IADC also holds its general HSE Committee meetings in Houston throughout the year to provide a forum for IADC's land-based HSE operations personnel to discuss any problems and to learn from the experiences of others in safety related areas.

RIG MOVING COMMITTEE

IADC's Rig Moving Committee is continuing to develop guidelines for rig-up trucks and rigging equipment. The Committee is reviewing topics such as load securement, commercial drivers license requirements and background checks. The committee is also examining the design of rig-up trucks and the type of rigging such as winches and gin-poles, and is working toward development of a

rig-truck design, inspection and certification guidance document.

The IADC Rig Moving Committee's mission is to protect employees, equipment, and the environment by providing leadership and guidance for industry practices and regulations. The committee also provides a forum to exchange the best practices of members and to disseminate those practices to the IADC membership.

The committee also serves as a channel for members, government agencies, manufacturers and customers to interact to improve the performance of the industry in matters relating to rig moving activities.

SPCC PLANS

IADC continues to monitor the Environmental Protection Agency's (EPA) Spill Prevention Control and Countermeasure (SPCC) rules. Last September, IADC submitted comments questioning whether "mobile equipment" was included in the June 2004 extension of the SPCC rules.

Owners of fixed facilities were given a one-year extension to develop and implement SPCC plans for their sites. Owners of mobile equipment visiting the site should be granted the same extension.

IADC requested that the EPA provide mobile and portable facilities the same extension granted to fixed facilities.

The oil company or operator of the well site (the fixed facility) will have information about the site and will make a determination regarding potential negative impact to navigable waters in developing a site plan.

This information is critical to determine how the mobile equipment plan is applied to the site. Due to these comments and those of other associations within the oil and gas industry, the Environmental Protection Agency issued a "Final Rule" giving an 18 month extension. In this "Final Rule" the EPA included an explanation that included mobile equipment in this extension.

OSHA

IADC continues to look out for members' interests by monitoring OSHA activities and efforts to form alliances. IADC is also reviewing and commenting on the Rig Inspection Sheet that is being developed by OSHA. ■