



INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

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29 July 2010

Richard E. Fairfax, Director
Department of Labor
Occupational Safety and Health Administration
Directorate of Enforcement programs
200 Constitution Ave. NW
Room N-3119
Washington, D.C. 20210

Dear Mr. Fairfax:

IADC is a trade association representing the interests of onshore and offshore drilling contractors operating worldwide. Founded in 1940, IADC's mission is to improve industry health, safety and environmental practices; advance drilling and completion technology; and champion responsible standards, practices, legislation and regulations that provide for safe, efficient and environmentally sound drilling operations worldwide. IADC drilling contractor membership represents approximately eighty percent of the land drilling rigs operating in the United States.

IADC holds Health Safety and Environmental workshops at various locations around the United States and always appreciates OSHA's participation at the workshops.

At one such workshop an OSHA Compliance Officer discussed changes in regulations and issues OSHA has related to the upstream oil and gas industry. During his presentation he commented that at a recent OSHA Compliance officer training school in Chicago the Compliance Officers were directed to use Construction Standards 1926 when inspecting drilling sites while the drilling rig is being rigged up or down. This is leading to confusion on well sites as to when the operation falls under 1910 and when it falls under 1926.

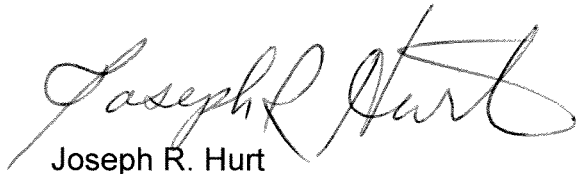
In the past OSHA personnel have indicated that 1926 only applies to the construction of the well site location and once the site is built 1926 does not apply. They also indicated that 1910 applies to all aspects of drilling operations.

In a court ruling it was determined that 1926 does not apply to drilling well sites, see: "H 30, Inc. v. Marshall C.A. 10, 1979. United States Court of Appeals, Tenth Circuit. H-30, INC., Petitioner, v. Ray MARSHALL, Secretary of Labor, and Occupational Safety and Health Review Commission, Respondents. **No. 77-1759.**"

In a letter received from Jeff Lewis of OSHA Region VI dated December 9, 2008 it stated that the only part of oil and gas well operations covered under 1926 was site preparation and that 1910 applies to all aspects of oil and gas well drilling operations.

IADC is seeking a letter of interpretation so that our members can fully understand which standards apply.

Sincerely

A handwritten signature in black ink, appearing to read "Joseph R. Hurt". The signature is fluid and cursive, with a large initial "J" and "H".

Joseph R. Hurt
IADC – Senior Director Land Operations

CC: Tom Galassi,
Patrick Kapust,
Art Buchanan,
Mike Marshall