



IADC Operations

OSHA Proposes to Change Workplace Incident Reporting

TO: US Onshore Drilling Contractors and Well Servicing Companies

Action Needed by: 31 January 2014

In the November 8, 2013 Federal Register OSHA issued a Propose Rule to require electronic reporting of incident data that employers are currently required to track on paper. OSHA is asking for comments by 6 February 2014 therefore IADC needs member comments by 31 January 2014. To assist in organizing our response IADC is planning to attend the hearing in Washington, DC on 9 January 2014.

In the Federal Register attached, OSHA has questions, that they are seeking answers from employers and the public. The questions have been recreated in the attached word document. Each company can use this form to forward their responses to IADC. OSHA also lays out a number of alternative options for reporting requirements and are seeking the industries input on them. In general OSHA indicates that they will only require electronic reporting from companies with over 250 employees or business with 20 or more workers who are in the designated as high-risk industries. Upstream oil and gas are not on the list, but they also plan to reserve the right to request information from companies that are not on the list or over 250 employees. Another part of this proposed rule is to post employer's records on their web page for the public to review. Their reasoning for this is so that companies can review employers safety records and chose to hire only the safest contractor, or workers can chose who is the safest employer to seek employment with. Currently MSHA requires mines to provide their injury and illness data electronically and MSHA posts the company information on their web site. Also, under current 1904 requirements OSHA 300 logs are to be kept per establishment (i.e. Rig). Due to this employers who have multiple establishments might be listed on their site per each establishment and not the total company. OSHA is proposing to add a definition of "enterprise" so that they can require companies with multiple establishments to report "establishment wide".

In order for IADC to develop a stance representing the upstream industry we are seeking input from drilling and servicing companies. IADC is also asking for volunteers to participate on a task group in early February in order to develop an industry position. If you or a member of your company wishes to participate or have additional questions, contact Joe.Hurt@iadc.org or at 713-292-1954.

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