Purpose

This plan is established to fulfill requirements of 30 CFR Part 250, Oil and Gas and Sulphur Operations in the Outer Continental Shelf (OCS), Subpart S–Safety and Environmental Management Systems (SEMS). It is intended to define the methods our company will use to implement the requirements of the regulation and to ensure an ongoing safe operation of our offshore oil and gas facilities.

§ 250.1900 through 250.1902

The goal of this SEMS program is to promote safety and environmental protection by ensuring all personnel aboard our OCS facilities are complying with the policies and procedures identified within the program. To accomplish this goal, our SEMS program identifies, addresses, and manages safety, environmental hazards, and impacts during the design, construction, start-up, operation (including, but not limited to, drilling and decommissioning), inspection, and maintenance of all new and existing facilities. If applicable, this program will apply to mobile offshore drilling units (MODU) when attached to the seabed and Department of the Interior (DOI) regulated pipelines.

This policy has been revised to comply with the SEMS II requirements. This rule became effective on June 4th, 2013. Operators have until June 4th, 2014 to comply with the new provisions of the rule with the exception of the auditing requirements under § 250.1920. Operators have until June 5th, 2015 to be in compliance with the revised auditing requirements of SEMS II.

All personnel involved with our SEMS program must be trained to have the skills and knowledge to perform their assigned duties.

§ 250.1903 Definitions.

Definitions listed in this section apply to Subpart S and supersede definitions in API RP 75, Appendices D and E and COS–2–04; and ISO/IEC 17011 (incorporated by reference as specified in § 250.198).

Accreditation Body (AB) means a BSEE-approved independent third-party organization that assesses and accredits ASPs.

Audit Service Provider (ASP) means an independent third-party organization that demonstrates competence to conduct SEMS audits in accordance with the requirements of the regulation.

Corrective Action Plan (CAP) means a scheduled plan to correct deficiencies identified during an audit and that is developed by an operator following the issuance of an audit report.

Personnel, means direct employee(s) of the operator and contracted workers.
Stop Work Authority (SWA) means the capability to immediately stop work that is creating imminent risk or danger.

Ultimate Work Authority (UWA) means the authority assigned to an individual or position to make final decisions relating to activities and operations on the facility.

§ 250.1904 Documents Incorporated by Reference

30 CFR 250.1904 incorporates by reference all of the requirements in API RP 75. Additionally, within the incorporated document the word “should” means “must” for the purposes of this program.

§§ 250.1905 through 250.1908 [Reserved]

(API RP 75 Element 1) § 250.1909 General

Company management requires that the program elements discussed in API RP 75 (incorporated by reference as specified in § 250.198) and in Subpart S are properly documented and are available at field and office locations, as appropriate for each program element. Management is responsible for the development, support, continued improvement, and overall success of the SEMS program.

Management Responsibilities:

1. Establish goals and performance measures, demand accountability for implementation, and provide necessary resources for carrying out an effective SEMS program.
2. Appoint management representatives who are responsible for establishing, implementing and maintaining an effective SEMS program.
3. Designate specific company representatives who are responsible for reporting to management on the performance of the SEMS program.
4. On an annual basis management must review the SEMS program to determine if it continues to be suitable, adequate and effective (by addressing the possible need for changes to policy, objectives, and other elements of the program in light of program audit results, changing circumstances and the commitment to continual improvement) and document the observations, conclusions and recommendations of that review.
5. Develop and endorse a written description of the company’s safety and environmental policies and organizational structure that define responsibilities, authorities, and lines of communication required to implement the SEMS program.
6. Utilize personnel with expertise in identifying safety hazards, environmental impacts, optimizing operations, developing safe work practices, developing training programs and investigating incidents.
7. Ensure that facilities are designed, constructed, maintained, monitored, and operated in a manner compatible with applicable industry codes, consensus standards, and generally accepted practice as well as in compliance with all applicable governmental regulations.
8. Ensure that management of safety hazards and environmental impacts is an integral part of the design, construction, maintenance, operation, and monitoring of each facility.

9. Ensure that suitably trained and qualified personnel are employed to carry out all aspects of the SEMS program.

10. Ensure that the SEMS program is maintained and kept up to date by means of periodic audits to ensure effective performance.