

IADC works for onshore drilling industry interests

IADC CHAMPIONS INTERESTS of the onshore contract drilling industry, which are especially impacted by activities of the US Department of Transportation, Bureau of Land Management, Environmental Protection Agency (EPA), OSHA and other state and federal agencies. IADC has represented the drilling contractors' interests in all issues that affect them.



Joe Hurt

NPDES STORM WATER PERMITS

Phase II of EPA's storm water general construction permits could cause delays by the operators to obtain permits to drill wells. Due to this, IADC is participating in and supporting the industry storm water coalition.

IADC signed an industry coalition letter to the EPA regarding two regulatory proposals related to storm water construction permitting and its effect on oil and gas exploration and production facilities.

The letter supported the action proposed by the EPA to delay Phase II requirements of the Storm Water General Construction Permit (GCP) for oil and gas construction activities.

The EPA determined that some construction activities on sites between 1-5 acres need to be permitted even though it was not compelled to require all construction activities be permitted. The letter stated that the EPA should evaluate the environmental risks and regulatory burdens that are created by requiring all sites over one acre to have a GCP.

The EPA postponed the permit authorization deadline until 10 March 2005 for the National Pollutant Discharge Elimination System (NPDES), the storm water permit for oil and gas construction activity that disturbs 1-5 acres of land. During the two-year postponement the EPA plans to work with states, industry, and other entities to gather

and evaluate data on the development and use of appropriate best management practices for the oil and gas industry. The new regulations of Phase II General Construction Permits went into effect for sites five acres or larger. Included in the new rules is a requirement for companies to issue a notice of intent (NOI) at least seven days prior to starting construction. Once the EPA's electronic database goes on line, the NOI will be the date that the NOI is posted on the database. This posting will depend on the EPA accepting the elements of the submitted NOI.

ACCIDENT PREVENTION

Under the direction of the Health, Safety and Environment Committee, the Accident Prevention Reference Guide is in the process of being revised and updated. Committee work has been completed and the task group has met to review the changes. The new title of the reference guide will be Health, Safety and Environment Reference Guide. There will be some new sections and some previous sections will be divided to become separate sections. Two new sections include one on environment and another on health. Some of the material in these two new sections was included in previous editions but was incorporated into other sections. This edition will devote separate sections to those topics, resulting in a guide that is more than just accident prevention but one that is a rig site guide on HSE.

The task group was comprised of members of the Health, Safety & Environment Committee.

SAFETY MEETINGS

The IADC HSE Committee is updating and revising its 52 Topic Safety Meetings book. This update is to incorporate some of the newer technology applied to rigs and drilling operations that were not included in the current version. The revisions will also bring the topics currently in the book up to date and in alignment with the standards for the equipment in the field today. These include topics about power tongs, top drives, automatic slips, air winches, etc.

The revisions will be completed by the end of the year.

API RECOMMENDED PRACTICES

IADC has been working with the American Petroleum Institute (API) on several recommended practice documents. Two are API RP 76, Contractor Safety Management for Oil and Gas Drilling and Production Operations, a new RP; and revisions to existing RP 4G. API RP 76 applies to upstream operations and is similar to a combination of downstream documents, API 2221, Standardized Safety Questionnaire, and API 2221, Contractor and Operator Safety Programs and implementation. The new document is nearly complete with only a couple of minor issues outstanding. Once completed it will be forwarded to API for final approval.

Joe Hurt, Director-Land Operations, participated on that task group for API as a representative of drilling contractors. The primary effort of this new document was to put together a standardized document that all operators could use. It also provides smaller operators with a template that can be used to evaluate the safety programs of drilling contractors and other service contractors.

IADC also was involved with revising API RP 4G, Recommended Practice for Use and Procedures for Inspections, Maintenance, and Repair of Drilling and Well Servicing Structures that was completed in 2002. Due to negative votes in the ballot process, the task group met to address the negative comments. The task group completed the review of the comments and made changes in the document. The document is presently under review by the API prior to final issuance.

Mr Hurt also participated on the task group as representative of IADC.

The recommended practice establishes a schedule for rig structure inspections. Category 1 is a daily inspection by the rig crew. Category 2 is a more thorough inspection of load bearing structures and sheaves during rig up. Category 3 includes the first two plus all load bearing components every two years. The final category, Category 4, would require that every ten years the mast be laid down and the crown section removed and sandblasted for non-destructive testing to determine the integrity of the mast. ■