

APPENDIX 13

US AND NORWEGIAN SAFETY LEGISLATION AND ENFORCEMENT

Introduction

1. This appendix sets out to describe the system in use in the United States of America and in Norway for the regulation of safety for offshore exploration and production. The Committee are indebted to the Esso Petroleum Company Ltd for the information about the US system and our thanks go to the personnel who took great pains to put together a comprehensive guide. This summary of that information is nevertheless the Committee's responsibility. The Committee went to Norway to gain first hand an explanation of the Norwegian system and our thanks go to those officials who freely gave their time to answer our questions.

US Outer Continental Shelf (OCS)

2. This note concentrates on the system of regulation on the US OCS because by far the greater volume of offshore activity takes place in such areas. The conditions for the small amount of offshore activity in state regulated areas vary from State to State although certain Federal requirements apply such as those of the Occupational Safety and Health Administration.

3. There are nine agencies involved in offshore safety regulation of which four are predominant. These are the US Coast Guard (USCG), US Geological Survey (USGS), the Occupational Safety and Health Administration (OSHA) and the Materials Transportation Bureau (MTB). The others are the Fish and Wildlife Service, US Corps of Engineers, Bureau of Land Management, Environmental Protection Agency and the Federal Aviation Authority. The following paragraphs describe the role and responsibilities of the four principal agencies.

4. *US Geological Survey.* The Outer Continental Shelf Act 1953 designated the Department of the Interior to administer mineral leases on the US Continental Shelf and the USGS is the Bureau in the D:Interior delegated to carry out this responsibility, part of which is described "... prevent damage to, or waste of, any natural resource or injury to life or property".

5. The USGS sets out the operating requirements for the OCS by means of OCS Orders which can have regional variations for particular needs. Enforcement by USGS personnel is by unannounced inspections and the Geological Survey charters its own helicopters. A checklist method of inspection is employed, probably because of the many detailed requirements in the 14 Orders currently in force in eg the Gulf of Mexico. The Orders cover operational and structural aspects; conservation of hydrocarbon reserves, pollution avoidance and safety of navigation and operation are all covered. Some Orders are not detailed and specify codes to be observed and results to be obtained. The trend however appears to be towards more detailed specific requirements.

6. The USGS investigate serious accidents and fires and the resultant report is publicly available. The Survey also disseminates information about practices which have resulted in accidents, by way of its Safety Alert Program.

7. The USGS require, review and approve the following:

- 7.1. Exploration well plan;
- 7.2. Development plan;
- 7.3. Oil spill contingency plan;
- 7.4. Critical operations and curtailment plan;